

MOPAC

MAYOR OF LONDON
OFFICE FOR POLICING AND CRIME

MPS-MOPAC JOINT AUDIT PANEL

28 March 2022

MPS Audit and 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.

In relation to DARA audits, since last quarter's report to Audit Panel, the Met has received 15 new actions that meet this monitoring threshold. During the same period, 15 actions were implemented and are now proposed as closed.

The HMICFRS PEEL assessment '*final evidence collection phase*' began on 21 February and concludes on 18 March. Running concurrently to this fieldwork is an investigation into a super-complaint related to stop and search - the Met is one of a small number forces participating in the investigation. The evidence gathered will inform the super-complaint and question 2 of PEEL (which relates to treatment of the public). HMICFRS has moved the publication date for the PEEL assessment to August 2022 (from July) to ensure that the evidence gathered across the entire continuous assessment period has been thoroughly assessed before reporting.

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 102 (59 High priority, 43 Medium priority) compared to 95 at last reporting quarter.

For wider context, the Panel will wish to note that in the quarter Baroness Casey of Blackstock has begun her independent review of Met Culture and standards.

Interdependencies/Cross Cutting Issues

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

Recommendation

To note the progress being made to track and monitor audit actions centrally that meets the agreed threshold.

1 Supporting Information

Risk and Assurance Board update

- 1.1 Risk and Assurance Board met on 1 March 2022 where they considered progress against outstanding audit actions and discussed the most recent limited audits (*Domestic Abuse Investigations Framework* audit and the *Met Detention – Capability & Capacity*); they also discussed the current HMICFRS PEEL inspection and the forthcoming publication of the counter corruption / Operation Drayfurn inspection report.

Internal Audit update

Performance progress on Internal Audit metrics

- 1.2 The corporate performance framework 2021/22 contains the below audit metrics under pillar 7 of the Met Direction: 'Responsible, Exemplary and Ethical'. These metrics were introduced at the start of the financial year. The progress we are making to achieve these ambitions is 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%
- 1.3 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% - (1 limited audit received in reporting period, the remainder were follow up audits)
Q3 21/22 – 50%

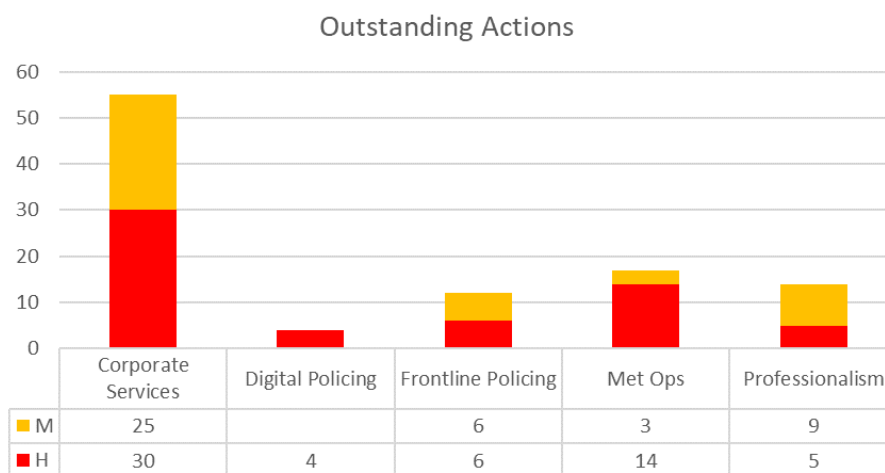
- 1.4 To assist business areas with completing their actions on time, Strategy and Governance review all outstanding audit actions with Chief Officers at their formal risk meetings. Business area leads are emailed one month before actions are due to ensure they are aware of approaching deadlines and are asked to inform us when any actions have been addressed. All areas of the business are actively encouraged, where appropriate, to ensure the risks highlighted are managed as part of their local risk management practices.

Internal Audit Progress update

- 1.5 Since last quarter’s report, the Met has received 15 **new actions** that meet this monitoring threshold (7 High priority, 8 Medium priority). During the same period, 15 **actions were implemented** (12 High, 3 Medium) and are now proposed as closed.
- 1.6 The total number of outstanding actions is now 102 (59 High priority, 43 Medium priority) compared to 95 at last reporting quarter. As previously reported, 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.

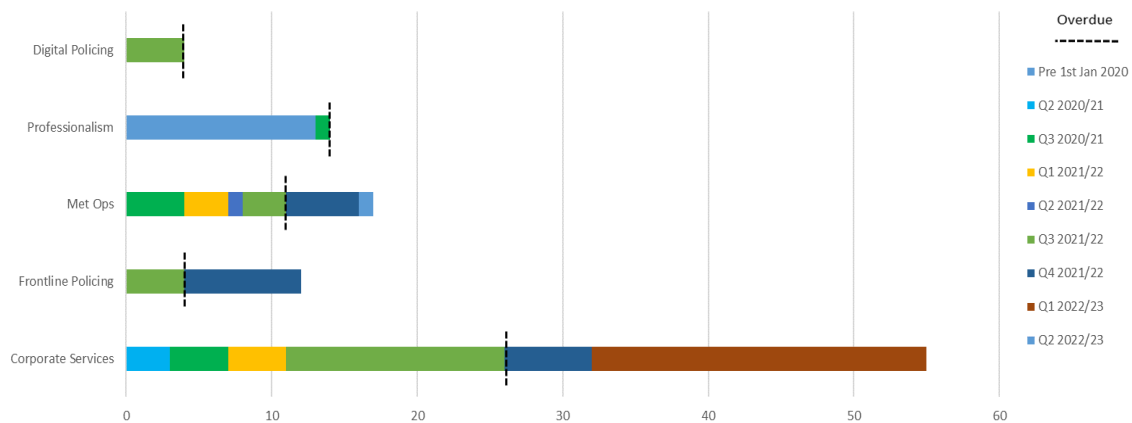
Agreed actions by business area

- 1.7 The 102 outstanding actions pertain to 19 audits. Distribution by business group is as follows:



- 1.8 Corporate Services own over half of the outstanding actions (56). 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.

Open actions by business group and Quarter due delivery date:



- 1.9 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.
- 1.10 Corporate Services have 27 actions overdue. 11 of these (due range between September 2020 and December 2021) relate to actions from the *Framework Supporting Data Protection Compliance* Follow up audit. There are also 6 actions now overdue (due date December 2021) from the Data Quality Framework Audit rated Limited.
- 1.11 In response to the concerns raised in these Data audits, the “Year of Data Quality” launched in January 2022. This programme of work is supported by the Deputy Commissioner and takes a strategic and tactical approach to embedding of core data quality principles within the Met. A forward plan for the next six months has been agreed which will address the outstanding risks and actions within all data related audits, significantly reducing the number of outstanding actions for Corporate Services by June 2022.
- 1.12 Commercial services are actively closing down all their actions from the Limited Development & Implementation of the Commercial Framework audit in advance of the April deadlines and have already met DARA to present the progress together with the evidence for DARA to review.
- 1.13 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.
- 1.14 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 – February 2022

Business Group	Actions past due date – February 22	
	Total actions outstanding	% overdue (due date)
Corporate Services	55	49%

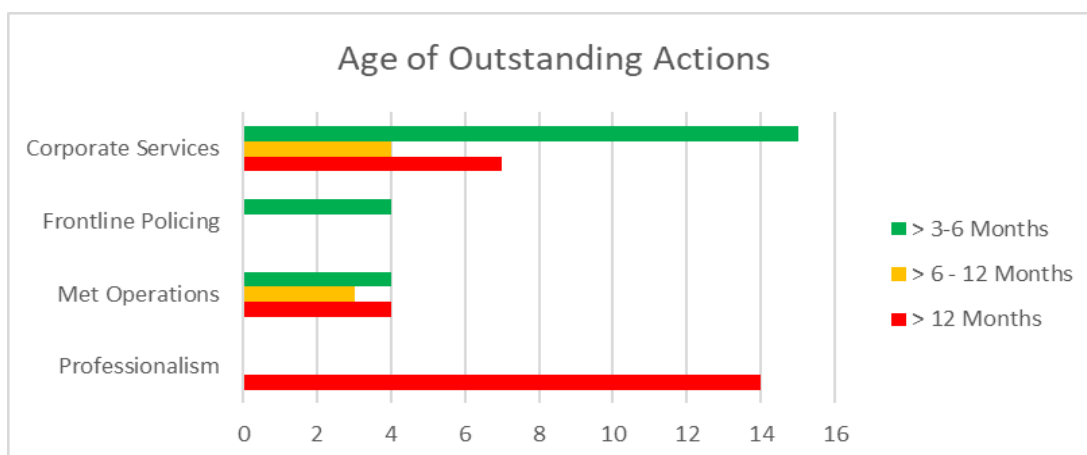
Digital Policing	4	100%
Frontline Policing	12	33%
Met operations	17	65%
Professionalism	14	100%

1.15 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 – February 22			
	Number Overdue Actions	Number overdue actions with revised completion date	% overdue (based on revised completion date)	% overdue without revised completion dates
Corporate Services	27	10	26% (7)	63% (17)
Digital Policing	4	4	0% (0)	0% (0)
Frontline Policing	4	3	25% (1)	25% (1)
Met operations	11	8	73% (8)	9% (1)
Professionalism	14	14	7% (1)	0% (0)

1.16 We now have 59 (45 High priority, 14 Medium) outstanding actions past their original due dates, (up from 51 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 (39 of the 59). 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.

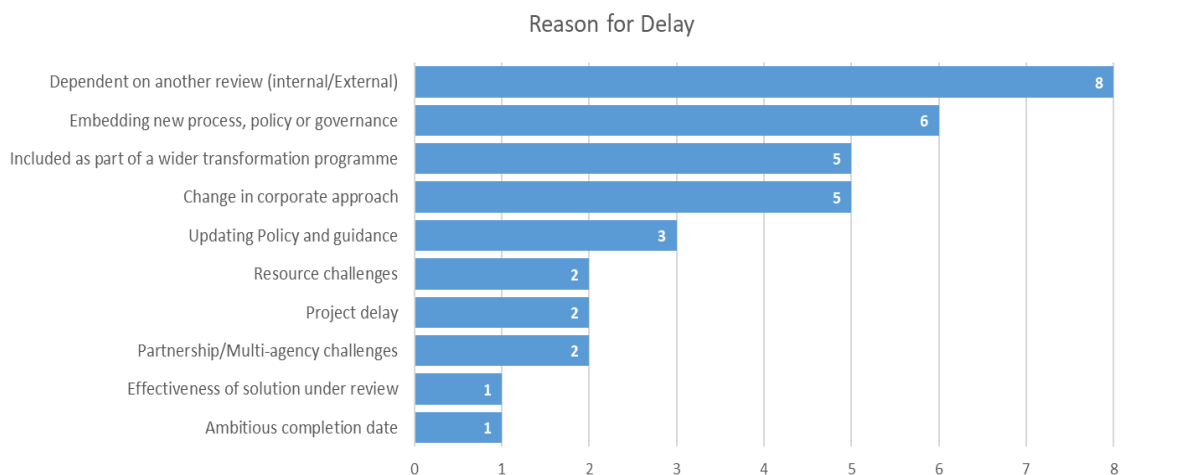
1.17 There continues to be a reduction in the number of significantly older actions (based on due date). The chart below includes those actions within Professionalism that form part of the Learning transformation programme.



Delays in meeting due dates

- 1.18 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. One of the frequently cited reasons for delay is that policy and guidance to be updated takes longer than the initial DARA timetable allows for.
- 1.19 The largest number (8) is that the action is dependent on another review, either internal or external. The majority of these relate to training, with an additional 2 relating to the London wide MASH review which involves 32 local authorities and a timeline of 12-18 months to complete. 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



Key Audit Themes

- 1.20 We have aligned the key themes arising from the audits with the DARA auditor descriptors. We continue to meet regularly with DARA to ensure our reporting reflects current audit practice.
- 1.21 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.



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

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

Assurance	29	28%
Management Oversight and Reporting	20	20%
Accountability	16	16%
Capability and Capacity	14	14%
Policy and Process	14	14%
Strategy Definition	5	5%
Risk Management	4	4%
Grand Total	102	

1.24 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.

1.25 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 by Strategy & Governance since last meeting

1.26 Since the last Audit Panel meeting, we have received the findings from the audits listed below.

- **Audit** – Digital Engagement – Online Crime Reporting (graded – Adequate)
 - **Audit** - Domestic Abuse Investigations Framework (graded – Limited)
 - **Follow Up** – Met Detention – Capability & Capacity (graded – Limited)
 - **Advisory** – Financial Assurance Framework
 - **Follow Up** – Payroll Overpayments Framework (graded – Adequate)
- 1.27 The *Domestic Abuse Investigations Framework* audit and the *Met Detention – Capability & Capacity* Follow up audit were graded limited. The leads for these audits provided Risk and Assurance Board with a brief of current and planned activity to address the risks and recommendations. Board members were content the plans provided assurance on the way ahead for these areas.

HMICFRS update

Overview

- 1.28 Since HMICFRS resumed appreciable inspection activity in September 2020, the Met has received 15 inspections. A number of these inspections have the similar theme in relation to trust and confidence i.e. counter-corruption, vetting and dealing with misogynistic and predatory behaviour.
- 1.29 Over the last quarter, demand significantly increased as final preparations for the PEEL inspection were identified (including a ‘mini’ inspection on one question within PEEL over a 2-week period) as well as 3 other inspections running consecutively.
- 1.30 We are also collating our assessments for the annual Force Management Statement, which broadly focuses on demand versus resource and capability.

PEEL assessment

- 1.31 The final evidence collection phase (fieldwork) for the PEEL assessment began on 21 February and will formally conclude on 18 March.
- 1.32 In excess of 30 strategic interviews are timetabled and four BCUs (North Area, South Area, West Area and Central South), the Territorial Support Group (TSG), the Violent Crime Taskforce (VCTF) and MetCC are the subject of focused reality testing which includes almost 40 focus groups in total.
- 1.33 As reported in January 2022, Q8 –“How good is the force at disrupting serious and organised crime?” has been removed from PEEL as Serious and Organised Crime (SOC) will become a regional inspection, incorporating Regional Organised Crime Units. We await further details on how London (Met, City of London Police and British Transport Police), which is not a ROCU, will be inspected. The results of our Victim Service Assessment and Crime Data Integrity audit will be included in the final PEEL report).

Super-complaint from Criminal Justice Alliance

- 1.34 The Met is one of a small number of forces engaged in an investigation into the super-complaint from the Criminal Justice Alliance regarding the alleged harms caused by the police use of “suspicionless” (section 60 Criminal Justice and

Public Order Act 1994) stop and searches, and inadequate scrutiny of stop and search powers. As there is significant crossover, with PEEL Q2 “How good is the force at engaging with the people it serves and treating them fairly, appropriately and respectfully?” the super-complaint investigation is running concurrently to the PEEL fieldwork and evidence gathered will be cross-referenced.

Thematic Inspections

Previous inspections

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

- 1.35 This is a Home Secretary commissioned inspection. The draft report was received on 8 February; it was reviewed for factual accuracy by interviewees and interested parties and returned to HMICFS to consider, along with a formal response. The final report is anticipated to be published around 22 March 2022 and is expected to be quite critical.

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

- 1.36 This national thematic inspection considered 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. There are four core questions in the terms of reference and due to considerable crossover with the Home Secretary’s first commission (specific to the Met) on three of them, HMICFRS focused on answering:
- i. How effectively do forces identify, prevent, detect and deal with prejudicial and improper behaviour based on gender by their police officers and staff?*
- 1.37 The Met was the first of seven forces inspected, with fieldwork taking place w/c 29 November. The inspection will continue through to the end of April 2022 and as their methodology has matured, HMICFRS has made a further request to the Met to support their evidence gathering. This has been limited to counter-corruption and vetting data and files for review, however the request has been substantial. The report is expected to be published in June / July 2022.

Serious Youth Violence (lead Cmdr Alex Murray)

- 1.38 A joint thematic inspection led by HMICFRS (involving HMI Probation) concluded on 4 February. Audit Panel queried at the last meeting when they would see the findings from this inspection; HMICFRS has stated their intention to publish the final report in May / June 2022. As this inspection is a national thematic, and therefore not Met specific, any recommendations emanating from this inspection will be for all forces to address.

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

- 1.39 A joint thematic inspection led by HMI Probation (involving HMICFRS and HMI Prisons) into the effectiveness of Multi-Agency Public Protection Arrangements (MAPPA) in Harrow and Barnet took place w/c 7 February 2022. The publication date is not yet known.

HMICFRS Monitoring Portal

Current position

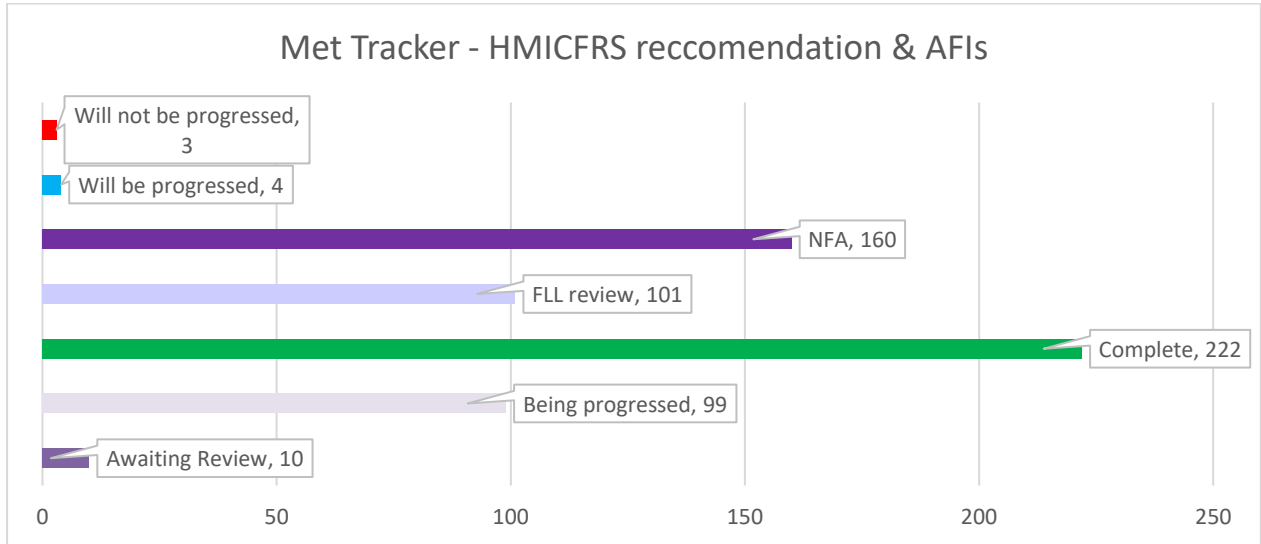
- 1.40 The Monitoring Portal holds all force and national thematic recommendations and areas for improvement (AFI) identified from inspections from 2018 onwards.
- 1.41 With new reports added over the quarter, the Monitoring Portal currently shows 134 open recommendations and 30 open AFIs.
- 1.42 This quarter 4 AFIs and 6 recommendations have been submitted to HMICFRS for review for closure.

Inspection theme	Total Recs	Total AFIs
Vulnerability (including 13 specifically related to the NCPI programme)	68	
PEEL	10	19
Stop & Search (includes A spotlight on stop and search and the use of force report of which there 6 recommendations)	7	
Fraud	2	4
Integrated Offender Management	4	
Roads Policing	6	3
Super complaint	3	
Police Collaboration	1	
ROCU	2	
Police Integrity & Corruption	3	
Online	6	
Bail	2	
Cyber		1
VAWG	12	
Policing in a Pandemic	6	
Policing Protests	2	3
Total	134	30

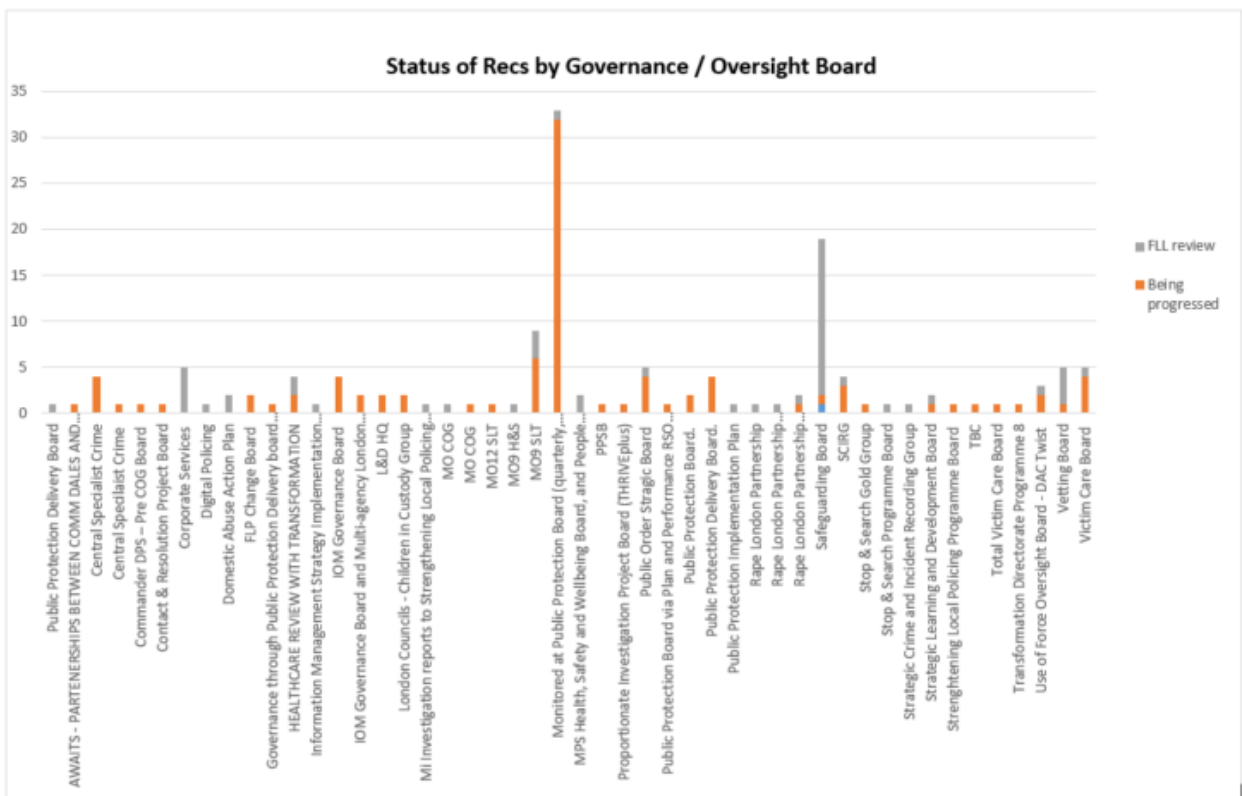
- 1.43 As we are in the tail end of the 12-month continuous assessment period and the PEEL inspection, our Force Liaison Lead will consider the evidence collated to determine which recommendations and AFIs can be closed. This is unlikely to be before our PEEL report is published in August 2022.

Met Tracker – HMICFRS recommendations & AFIs

1.44 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 134 open on the Monitoring Portal we assess that 101 are closed – these have been sent to HMICFRS for review and closure and we await their confirmation to move them to ‘complete’ status.



1.45 We have engaged with leads to determine which governance boards oversees and drives activity to implement recommendations and AFIs; 48 different governance boards were identified.



1.46 It is hoped that once PEEL activity has concluded the intensity of inspection activity seen over the last 17-months will reduce, releasing time to consider the wider development of the tracking process to increase effectiveness and insight to support the work across the Met to rebuild trust and confidence.

2 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.

3 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.

4 Legal Implications

There are no direct legal implications arising from this report.

5 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.

6 Contact Details

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

7 Background papers:

None
