

**M O P A C**MAYOR OF LONDON  
OFFICE FOR POLICING AND CRIME

## MPS-MOPAC JOINT AUDIT PANEL

### 5 July 2021

### 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.

Since last quarter's report, the Met has received 47 new DARA actions that meet this monitoring threshold. During the same period, 39 actions were implemented and are now proposed as closed. Of these, 20 are from original audits and 19 from follow-ups.

HMICFRS has conducted two inspections since the last report and they have given notification for two further inspections (in July and October). PEEL inspection activity is beginning to increase with evidence collection expected to intensify over the forthcoming quarter. HMICFRS is undertaking focused work to review the number of recommendations and areas for improvement still open on their Monitoring Portal that the Met has submitted for closure.

##### Key Considerations for the Panel

The Panel is asked to consider the breadth of audit activity taking place by DARA. The concerted efforts by colleagues to address their outstanding audit actions in all business groups continues to have a positive impact, particularly in Met Operations.

The panel should also note that the revised corporate performance framework 2021/21 now contains metrics for audits and follow ups 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 the report from now on. Finally note some of the key activity taking place to address the wider risk themes highlighted within audit reports.

##### 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 1 June 2021 where they considered the significant progress against outstanding actions and notably the improvements being made before follow-up audits which is resulting in an increase in adequate ratings.

**2 Internal Audit update**

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

Since last quarter’s report, the Met has received **47 new actions** that meet this monitoring threshold (40 High priority, 7 Medium priority). During the same period, **39 actions were implemented** (21 High, 18 Medium) and are now proposed as closed.

It is worth noting that 26 of the 39 actions recommended for closure were from Met Operations, with 17 from Limited audits, demonstrating particular commitment from this Business Group to address areas that have been identified as high risk.

The total number of outstanding actions is now 106 (73 High priority, 33 Medium priority)

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.

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.

**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 the report from now on. The current position is as follows:

- 1) Implement 90% of our high risk audit recommendations within the deadline. – Current Performance = 100%

According to our recorded data since the last panel we have implemented 67% of the actions due on or before the deadline. However due to reporting deadlines and the timings of the formal quarterly update request to the business, the calculation is based on 2 months of data. Further analysis of the information shows that this quarter we have actually achieved 100% (three reports were reported on as delivered, after the submission cut-off for the previous board – but delivery occurred during the respective quarter).

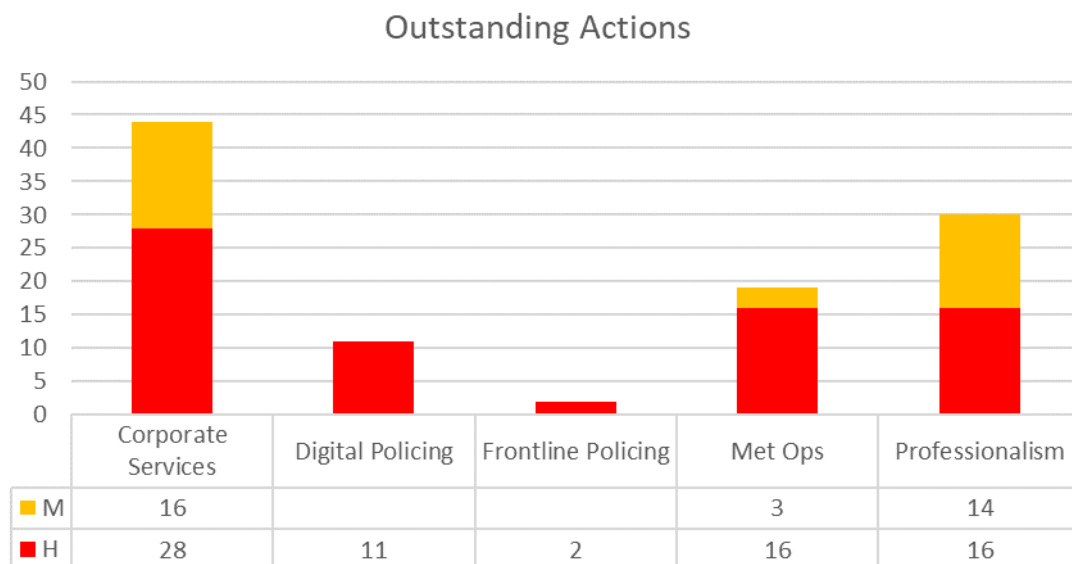
- 2) Increase the percentage of audits rated adequate or above. – Improve from the baseline, 2021/22 data available next quarter

FY	Adequate reports received
20/21	79%
19/20	69%
18/19	75%

### Agreed actions by business area

The 106 outstanding actions pertain to 21 audits. 33 actions are in response to medium-risk in “limited assurance” reports and 73 to address high-risk actions from all reports.

Distribution by business group is as follows:

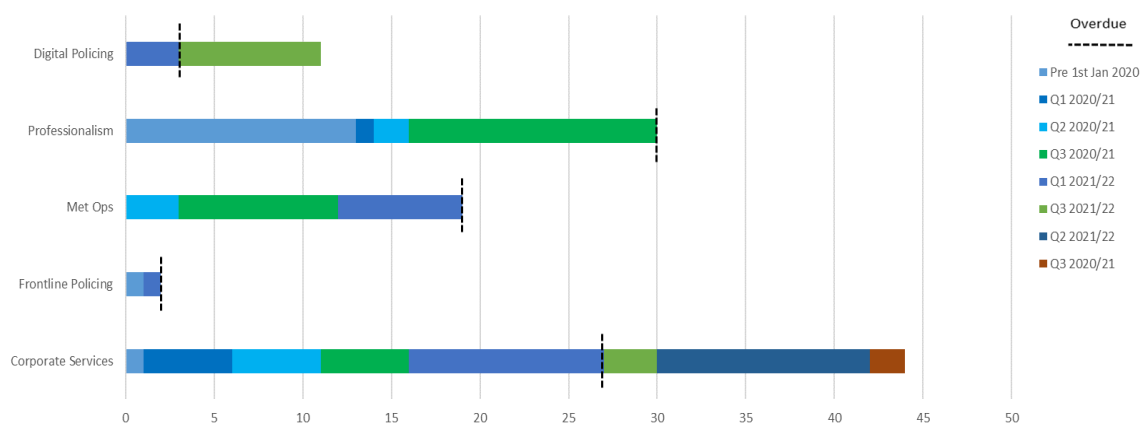


Corporate Services have the most outstanding actions. This business area encompasses some of the most focused audit risk areas in the Met (Finance, Commercial, and Safety & Health) so we should expect the number of actions to be greater than other parts of the Met. The rise this quarter can be explained by an increase in audit activity in this area with 4 audits received since the last reporting period. Whilst this is an increase in outstanding actions (from 25 to 44), the

governance and visibility of actions that remain outstanding has vastly improved in this area and progress is being made to deliver the most the actions within the required agreed timescales.

Over the last quarter Met Operations committed to reviewing and addressing outstanding actions and undertook a targeted exercise to review all recommendations and close those that have met the required activity. The exercise has led to a reduction in outstanding actions as well as ensuring the risks identified by the audit are captured on local risk registers which is a commendable step to improving their risk management processes.

*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.

Corporate Services have 25 actions overdue. 9 of these are from the Framework Supporting Data Protection Compliance follow up audit. Significant progress has been made with these actions with activities clearly defined and revised due dates of October 2021. A number of these actions will be fully addressed once the appointed Information assets owners are in place to drive forward a culture of Data Protection Act compliance for the assets under central control.

There are also 9 actions outstanding from the MPS Counter Fraud Arrangements follow up, however the action plan was approved at Risk and Assurance Board in March and since then, 6 actions have been delivered and progress is on track to address the remaining actions.

All of the outstanding actions for Professionalism are now past their original due date, however 13 of the 30 (43%) of these relate to training and form part of the Learning and Development Transformation programme. Following discussions with DARA and Professionalism, we have agreed that these will be addressed as part of the wider programme and monitored through the programme governance processes. 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 actions.

2021/22 Q1 current position – June 2021

Business Group	Actions past due date (Q4)	
	Total actions outstanding	% overdue (due date)
Corporate Services	44	57%
Digital Policing	11	27%

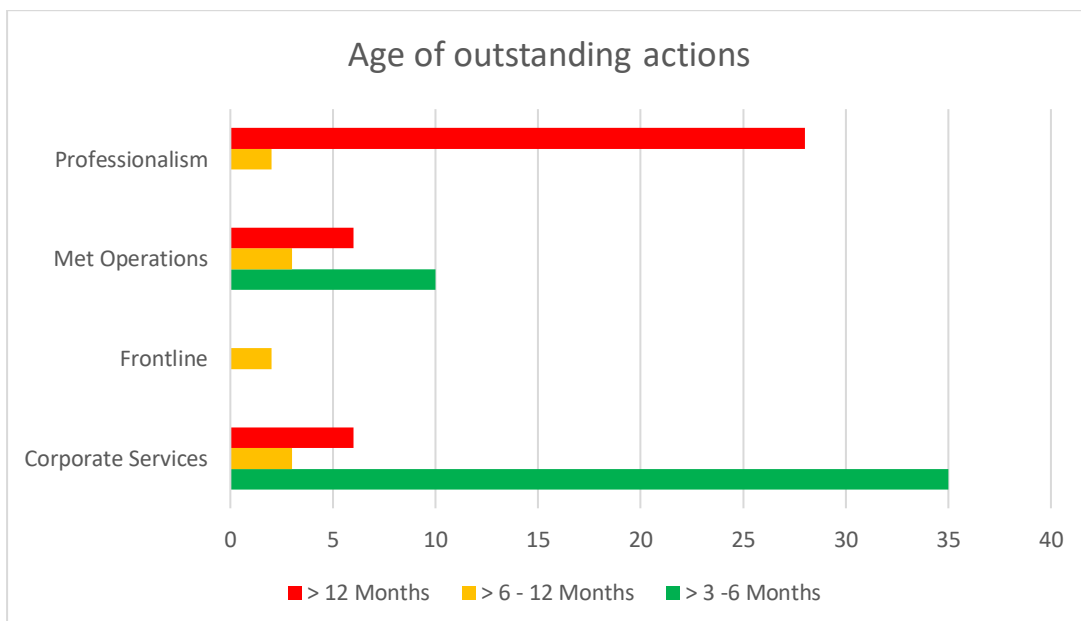
Frontline Policing	2	100%
Met operations	19	68%
Professionalism	30	100%

Last quarter 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 (Q4)			
	Number Overdue Actions	Number overdue actions with expected completion date	% overdue (based on expected completion date)	% overdue without expected completion dates
Corporate Services	25	17	29% (5)	32% (8)
Digital Policing	3	3	0% (0)	0% (0)
Frontline Policing	2	1	0% (0)	50% (1)
Met operations	13	7	29% (2)	46% (6)
Professionalism	30	30	7% (2)	0% (0)

We now have 73 (47 High priority, 26 Medium) outstanding actions (past their original due dates), down from 86 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 (58 of the 73). 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.

When we look at the age of the outstanding actions we can see that there continues to be a reduction in the number of significantly older actions (excluding Professionalism and those that form part of the Learning transformation programme).



## Delays in meeting due dates including the impact of COVID-19

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 still COVID-19 related (22). However when looking at the current picture for outstanding actions (54 responses), COVID-19 related delays reduce to 5 which suggest the initial impact on deadlines has now been addressed.

The largest number (15) is that the action requires Policy or Guidance to be updated. All of these relate to the Framework Supporting Inclusion & Diversity Strategy audit and is closely linked with the MPS STRIDE strategy which is currently being reviewed and due to be published in Autumn 2021.

### *Delay reasons for current actions*

Delay Themes	Total
Ambitious completion date	1
Awaiting Chief Officer decision/Sign off	1
Recruitment	1
Change in corporate approach	2
Project delay	3
COVID-19 related delay	5
Included as part of a wider transformation programme	5
Dependent on another review (internal/External)	6
Resource challenges	6
Embedding new process, policy or governance	9
Updating Policy and guidance	15
<b>Grand Total</b>	<b>54</b>

## 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 and have agreed that going forward they will:

- Endeavour to write the risks in a way that they are clear and specific, so that these can be easily lifted to appear on business area risk registers where appropriate (and managed as part of risk management processes).
- Clearly identify which risk theme each risk sits within so we can start to understand what areas we incur the most risk so we can look to put more internal controls in these areas.

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. There is activity happening across the business to address these themes, highlights include:

#### **Policy and Process:**

- New RUI policies have been launched to keep victims updated every 28 days for RUI and those subject to voluntary attendance. There will be a review on compliance in July 2020 by Met Detention to ensure the new policies are being embedded. The new policies are now live and link across to Operation Larimar.
- Inclusion and Diversity strategy will include a clear communication and engagement plan.
- Payroll Overpayments framework - Managing Public Money, Annex 4.11 is used to inform recovery action and any subsequent writes-off. This will be formally referenced in the SOP and decisions, including identification of key responsibilities.

#### **Management and oversight and reporting:**

- The MPS STRIDE strategy is being reviewed, and next strategy will be published in autumn 2021. It will continue to report into AC Professionalism, and will be underpinned by a clear action plan which will be administered through CPIE.
- Finance working with SSCL to define and deliver appropriate Management information and reporting. They continue to work with SSCL to improve data quality and record keeping procedures; SSCL are reporting regularly on progress to address the issues raised as part of their internal audit. Consideration is being given to suitable SLAs to focus oversight.

**Capacity and Capability:**

- The backlog of initial interviews for MPS Specials constabulary has been significantly reduced and SSCL have developed a recovery plan to increase recruitment.
- The vetting unit have increased the numbers of MSC vetted at an earlier stage in recruitment.
- The new Task Force performance framework includes data capture to evidence abstractions, overtime, and information on demand and shift changes. It also highlights when TF cannot service other BCU or specialist command demand requests. Overall demand requests continues to be monitored via monthly performance review which shows a high level of meeting demand (100% for requests for TSG, 100% for Mounted and 94% for DSU).

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.

- **Data Protection, data handling and retention within legal guidelines** - In recent years Data Protection and data handling have come to the forefront of the MPS' responsibilities. Consequently, several business groups are examining the best means of protecting data, data retention on police systems and adhering to the data protection guidelines whilst ensuring effective use of data in the legal arena and fight against crime. This is particularly pertinent with the increase in cybercrime and police data being a highly sought commodity.
- **Training and training capabilities for police personnel** - Several actions across business groups highlight training requirements to improve efficiency, using new IT systems, better use of police systems and adherence to national standards as stipulated by the college of Policing. Furthermore, improved training capability will maintain standards with a roll out of a uniformed approach and assist in minimising data breaches (where the training relates to use of IT systems).
- **Technology** – New IT systems for better and increased data retention, efficiency and monitoring capability have been stipulated as required across several business groups (as above). This also feeds into data handling and training actions and requirements. A number of these are in the process of being acquired so this should see an improvement in this area.
- **Strategic approaches** – A small number of actions relate to the creation of strategies for specific areas within business groups. Whilst this is not a high risk action, strategies or clearly articulated plans provide clarity to address identified issues.

Work will be done 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 panel**

Since the last Audit Panel we have received the findings from the following audits:

- Cyber Security Framework – Audit - Adequate
- B/OCU Budgetary Control Framework – Follow up - Adequate
- Payroll Overpayments Framework – Audit - Limited
- Framework Supporting Data Protection Compliance – Follow up - Adequate
- Business Continuity and Return to Normality Arrangements – Follow up - Adequate
- Review of Framework Supporting released Under Investigation – Follow up - Adequate
- Environment and Sustainability Management - Impact of Investment Decisions on the Environment - Adequate

The Payroll Overpayments Framework audit was graded limited. The leads for this 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. Risk and Assurance Board discussed and approved this when they met in June.

## **3 HMICFRS update**

### **Covid-19 – HMICFRS position**

HMICFRS continue to operate remotely due to coronavirus restrictions. There remains a number of challenges to facilitate inspections in this way, but in the main, we are managing them well. Since the last report to Audit Panel where we reported five inspections have been conducted since appreciable inspection activity resumed in October 2020 until the end of March 2021, the Met has had two further inspections conducted remotely:

- The Sarah Everard vigil - An inspection of the Metropolitan Police Service's policing of a vigil held in commemoration of Sarah Everard on Clapham Common on Saturday 13 March 2021
- Inspection of suspects with mental health conditions within the Criminal Justice System.

HMICFRS has conducted an evaluation of their remote inspection methods and the findings have suggested that most people in their organisation and across forces support a blended approach going forward. We can expect that in the future, interviews, case file reviews, staff surveys and meeting observations will be conducted remotely. Their evaluation has shown that focus groups are harder to conduct remotely and the lack of reality testing whilst inspecting remotely has affected confidence in triangulation and raised concerns about their ability to make judgments in the future. It is anticipated that by the time our PEEL reality testing activity will commence in earnest, coronavirus restrictions will have eased and therefore our reality testing will be conducted in the usual way.

## PEEL Inspection

The evidence gathering process for the PEEL assessment has begun with our Force Liaison Lead (FLL) collating evidence from all the inspections which have taken place since January 2021; over the coming quarter she will increase her presence at key strategic meetings to gather information.

We expect to receive notification in August / September of the next phase of the PEEL process which will include a significant document request, the counter corruption and vetting onsite activity (as detailed in the last report) and our Victim Service Assessment (VSA); it is possible we will also receive notification of the crime data integrity assessment at this time too.

The interviews of strategic leads and key individuals is also likely to begin at this time.

## Judgments

HMICFRS has further clarified the changes to the PEEL process, specifically in relation to judgments. Previously, they used a four-tier structure for judgments: outstanding, good, requires improvement and inadequate. They also gave judgments at the pillar level (effectiveness, efficiency and legitimacy) and at the level of the core inspection questions. After consultation they are making changes to the PEEL judgments and moving to a five-tier structure, and will give judgments at a core question level only.

It is their aim to make it clearer where they consider improvements are needed, and better reflect force performance, by adding more nuance to judgments. The new structure will separate the “very good from the barely good”. It will encourage those forces who are currently stable in ‘good’ to continue to improve in line with their principal aim for PEEL.

The five tiers of judgments will be:

<b>Tier</b>	<b>Descriptor</b>
Outstanding	The force has substantially exceeded the characteristics of good performance
Good	The force has demonstrated substantially all the characteristics of good performance
Adequate	The force has demonstrated some of the characteristics of good performance, but we have identified areas where the force should make improvements
Requires improvement	The force has demonstrated few, if any, of the characteristics of good performance and we have identified a substantial number of areas where the force needs to make improvements
Inadequate	We have causes for concern and have made recommendations to the force to address them

HMICFRS will test and evaluate the five-tier approach as part of their pilot activity in three forces to test the methodology across a range of geographic, social and operational contexts.

It should also be noted that they will no longer provide forces with a full ‘judgment criteria’, they will only provide ‘characteristics of good’

## Thematic inspections

### Forthcoming inspections

#### ***Criminal Justice Joint Inspection of how well the Criminal Justice System serves survivors of rape (AC Louisa Rolfe)***

This inspection is being conducted in two phases; Phase one focused on “*what are the barriers to the progression of rape reports up to the decision to charge?*” This phase is now been completed and the report is being prepared for publication.

The Met is one of five forces to be inspected on Phase 2, which will seek to answer, “*What are the barriers to the progression of rape reports in the criminal justice system following charge?*”

Specifically, the inspection will aim to assess:

- a) How well do the police and CPS work together to prosecute reports of rape after charge?
- b) How well are victims supported through the criminal justice system?

The inspection will take place remotely 28 June - 9 July 2021.

#### ***Counter Terrorism 6 (CT6) (AC Neil Basu)***

This inspection will consider “*How well prepared is the police service to respond to a terrorist CBRNE incident.*”

It will examine the following:

- a) how well prepared are police forces to deal with the initial report of a CBRNE incident? and
- b) how well prepared is the CT network to respond to a terrorist CBRNE attack?

This will include plans, command, control and communication arrangements, access to specialist advice, the first response (including JESIP arrangements), roles and responsibilities of police, exercising and lessons learnt.

The inspection will take place 11 - 15 October 2021.

## Previous inspections

#### ***Policing of the Sarah Everard vigil inspection (lead AC Louisa Rolfe)***

The Home Secretary and Mayor of London commissioned HMICFRS to conduct an urgent short-notice inspection, and expected them to report their findings in quick time. As well has a considerable number of interviews, there was a substantial document request which resulted in around 800 documents shared with HMICFRS including

policy documents, use of force forms; body worn video and officer statements. HMICFRS concluded that the Met acted appropriately at the vigil.

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

The 'hot-debrief' for the inspection took place on 2 March where high level early findings were shared. The broad report was that progress has been made, however there are still some areas that remain challenging. The draft report was received on 25 May for the pre-publication checks to be conducted. Publication of the final report is expected by the end of June.

***Covid-19 Policing Inspection (Lead T/DAC Jane Connors)***

The full national report was published on 20 April 2021. It said that in general police forces took immediate and decisive action to respond to the extreme circumstances of the pandemic, although there were some inconsistencies. Six recommendations have been made to all forces to address; to address these, an action plan via Covid Gold has been established.

***Protest Policing (Lead AC Louisa Rolfe)***

The national thematic report was published on 11 March 2021. HMICFRS made five recommendations for forces and to address these an action plan, via AC Louisa Rolfe, has been established.

***Sensitive intelligence (Lead AC Louisa Rolfe)***

The Met is one of 12 organisations (six forces, five regional organised crime units (ROCU) and the NCA) who were inspected, which concluded on 12 March 2021. The draft report was received on 14 May for critical review but at the time of writing, there has been no formal indication as to when the report will be published.

***Inspection of suspects with mental health conditions within the Criminal Justice System (Lead AC Louisa Rolfe)***

The Met was one of a number of forces selected for a joint HMICFRS inspection led by HMI Probation (also involves HMI Prisons, the Care Quality Commission and HMCPSI) assessing the effectiveness of dealing with suspects with mental health conditions within the Criminal Justice System. This inspection was held 10-14 May 2021. At the time of writing we do not know when the draft report will be released.

***Stop and search review***

HMICFRS published a thematic report "*Disproportionate Use of Police Powers: A report on stop and search and the use of force*" on 26 February 2021. HMICFRS made six recommendations for all forces; to address these, an action plan has been established and feeds in to the wider scope of the Deputy Commissioner's Delivery Group.

**HMICFRS Monitoring Portal**

***Current position***

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

With new reports added, the Monitoring Portal currently shows 131 open recommendations and 31 areas for improvement.

The table below details the number of recommendations and areas for improvement that are reported to be 'open' on the MP broken down by inspection theme. We have also included whether the inspection was Met specific or a nationwide thematic report.

Inspection theme	Met / Nationwide	Total Recs	Total AFIs	Comment
Vulnerability (including 13 specifically related to the NCPI programme)	Met	43	0	Recently inspected
PEEL	Met	10	19	Inspection due
Stop & Search (includes A spotlight on stop and search and the use of force report of which there 6 recommendations)	Nationwide	7	0	Will be covered in PEEL
Information management	Nationwide	1	0	
Undercover Policing	Nationwide	17	0	Paused pending Public Inquiry
Fraud	Nationwide	2	5	Recently inspected
Integrated Offender Management	Nationwide	4	0	Recently inspected within NCPI
Roads Policing	Nationwide	6	3	
CT	Nationwide	1	0	
Review of investigations into allegations of non-recent sexual abuse by prominent people	Met	11	0	Re-inspection / reality testing will be done
Police Collaboration	Nationwide	1	0	
ROCU	Nationwide	2	0	
CPS	Nationwide	4	0	
Police Integrity & Corruption	Nationwide	3	0	Will be covered in PEEL – but all have been submitted for closure
Online	Nationwide	6	0	
Bail	Nationwide	2	0	
Cyber	Nationwide	0	1	
Super Complaints	Nationwide	4	0	New report
Policing in a Pandemic	Nationwide	5	0	New report
Policing Protests	Nationwide	2	3	New report
<b>TOTAL</b>		<b>131</b>	<b>31</b>	

This however is not a true reflection of where we assess progress to be. In previous reports we have informed Panel, that our HMICFRS Force Liaison Lead (FLL) has not reviewed a considerable number submitted for consideration to close. In part, this has been a time and resource issue for our FLL but also HMICFRS will not formally close any entries on the MP 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. This is however, an improving position as recently a new HMICFRS Inspection Officer (IO) has been appointed to assist our FLL.

As HMICFRS continue to operate remotely our FLL and IO have begun some focused work to actively review each entry submitted for closure. If they are satisfied with the evidence presented, the recommendation / AFI will be closed or, they may ask for further supporting evidence i.e. meeting minutes, policy documents etc. This activity should expedite the closure of recommendations or AFIs, however if they are not content to accept the remote evidence, the entry will remain open until such time they can conduct reality testing in person. Making progress on this with HMICFRS will be important for us.

Since the March report, a further four areas for improvement and five recommendations have been submitted to our Force Liaison Lead for consideration for closure.

As part of the 12-month continuous improvement approach for the PEEL inspection, those recommendations that are covered by PEEL will be prioritised by our FLL. These are recommendations / AFIs which are related to:

- Public treatment
- Investigations
- Ethical, lawful & inclusive workforce

These have been highlighted within the table above.

As requested by Panel last meeting, we have reviewed our own tracker to provide a more comprehensive and up to date position of recommendations and AFIs. The table below details the status of all entries on our tracker (which totals 551) according to the approved HMICFRS status description

<b>HMICFRS OFFICIAL STATUS</b>	<b>Total Recs</b>	<b>Total AFIs</b>
Complete <i>(implemented)</i>	203	8
Being progressed	45	46
Will be progressed <i>(these are dependent on implementation of others)</i>	4	0
Will not be progressed	0	1
Awaits Force Liaison Lead review	45	37
Holding position <i>(restricted to Uncover Policing)</i>	17	0
NFA <i>(national reports – not for forces to address)</i>	136	3
Awaiting review <i>(new reports received)</i>	4	2
<b>TOTAL</b>	<b>454</b>	<b>97</b>

In particular, Panel wanted to know the status of the three recommendations shown as 'open' related to the Police Integrity and Corruption inspection; these are all considered to be complete, but await verification by HMICFRS therefore fall into the

category Awaits Force Liaison review. The topics covered by these recommendations will be further tested through the forthcoming PEEL inspection.

#### **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