



Annual Governance Statement 2023/24

Commissioner of Police of the Metropolis

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Introduction

To meet the demands of policing London effectively, the Metropolitan Police Service (the MPS) must have strong governance, with clear mechanisms and relationships through which the organisation is directed and controlled. This means robust decision-making processes and internal controls that support and strengthen our operational activity.

The MPS conducts an annual review of the effectiveness of its systems of internal control and publishes this statutory Annual Governance Statement (AGS) with the Statement of Accounts. The AGS has been completed using input from the relevant senior officers and staff and in consideration of the opinion of the Directorate of Audit, Risk and Assurance (DARA). It also outlines the findings of the MPS's Statement of Internal Control Survey, which seeks the views of senior leaders across the organisation. The survey is aligned to the seven Chartered Institute of Public Finance and Accountancy (CIPFA) Governance Principles (see Appendix).

In summary, the MPS' Statement of Internal Control is that, while there has been progress in some areas, there remains a need for further improvement. Similarly, in their Annual Audit opinion, DARA identified that the MPS internal control environment is limited in its effectiveness in supporting the achievement of strategic objectives. However, they note that some progress has been made and a definitive plan to improve effectiveness is now in place.

Improvements identified in this report will be tracked as part of an overall assurance process that also measures progress against key recommendations by His Majesty's Inspectorate of Constabulary, Fire & Rescue Services (HMICFRS) and others, and against A New Met for London and the MPS' 2024/25 Business Plan.

Assessment of current position

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

According to the latest available ONS data measuring perceptions of policing, the falling confidence we have seen is stabilising and confidence in the MPS is in line with the England and Wales average and above our most similar forces in some areas. 51.7% of people surveyed say we are 'doing an excellent or good job', which is above the 49.1% average for England and Wales. 54.7% agree the MPS is reliable, against an average of 50.6% across other forces.

Internally, the MPS has continued to improve the integrity of the organisation:

- A dedicated Assistant Commissioner for Trust and Legitimacy was appointed.
- To meet the Commissioner's commitment to deal with wrongdoing, the MPS introduced new policies to remove those who corrupt its integrity and increased the number of misconduct investigations. The MPS has dismissed more than 100 officers in 2023/24, and aims to process misconduct cases faster, with a target of 30 gross misconduct hearings and 30 gross incompetence hearings a month.
- Robust processes are now in place to monitor business interests, gifts and hospitality, and declarable associations, with mandatory checklists part of the Learning Management System (LMS).

The MPS' own senior leaders expressed increased confidence that the organisation has the systems in place to effectively manage standards, though the number of misconduct cases is still cause for concern.

2. Ensuring openness and comprehensive stakeholder engagement

Throughout 2023/24, the MPS has increased its engagement with the public and stakeholders on some key areas. The MPS:

- Held dedicated engagement events across all London boroughs to launch A New Met for London and ensure communities understood the MPS' local aspirations and action plans;
- Consulted on several key policing initiatives, including a new Violence Against Women and Girls (VAWG) action plan, the London Race Action Plan and Stop and Search Charter, a new children's strategy, and Clear, Hold, Build (designed to tackle serious and organised crime in communities).

Since October 2023, the Israel/Hamas conflict has driven greater levels of public concern, especially within the Jewish and Muslim communities. The MPS has ensured an increased level of engagement with those communities, to understand their concerns and provide reassurance. This has included visits to religious premises and schools.

More broadly, the MPS refreshed its communications strategy during 2023/24, providing a more strategic, thematic focus. At the same time, the Communications Advisory Panel was revamped to include business leaders for future consultation. A new officer reference group was also established to capture improved insight into, and ultimately improve, ways of working.

Among senior leaders, it was considered that there was good communication by the MPS with partners and stakeholders in relation to sharing crime data, performance, policing priorities and resourcing levels.

Progress towards actions raised for 2023/24

Action	Status
Developing a communications strategy to improve our engagement with Londoners	Complete – strategy refreshed and launched
Increasing engagement with public and partners, building on consultation exercises for the VAWG Action Plan and STRIDE.	Complete – now part of business-as-usual activity.

3. Defining outcomes in terms of sustainable economic, social and environmental benefits

To manage environmental and sustainability impacts arising from operations (including all support and enabling services), the MPS maintains an Environmental Management System aligned to ISO 14001. The MPS has a dedicated Senior Environmental Champion at Management Board level, and an established strategy. The 2023-2025 Environment and Sustainability Strategy has three aims:

- To reduce the impact of the MPS on the environment;
- To become a more resource-efficient and resilient organisation; and
- To embed environmental sustainability considerations in decision-making.

The Sustainability Management Plan (SMP) for 2023/24 was developed based on key environmental and sustainability risks and comprised activities across the MPS aimed at improving environmental and sustainability performance.

Quarterly Environment and Sustainability Boards were held during 2023/24, reporting on progress against SMP activities. By Q4, 75% of all SMP activities had been successfully completed (80% including those activities mainly complete), with minor elements rolling over to 2024/25.

Examples of notable activity during 2023/24 include:

- Ongoing delivery of 14 decarbonisation projects (supported by a £9.5m grant award from the Public Sector Decarbonisation Scheme (PSDS)), and the award of a further £5.7m PSDS grant to support six additional projects;
- The roll-out of mobile technology end-point devices by DDaT, generating an estimated electricity demand reduction of more than 40%; and
- The recruitment of a project manager and definition of project scope to deliver the MPS' electric vehicle charging infrastructure strategy and implementation.

During 2023/24, DARA conducted a further audit of the environment and sustainability function. They set out the following key recommendations:

- The Environment and Sustainability Strategy, including defined objectives, should be reviewed, in consultation with MOPAC, and aligned to NMfL and other strategies as appropriate.
- Liaise with MPS Strategy and Transformation to undertake a corporate assessment of the environment and sustainability risk to the MPS.
- Liaise with MPS Strategy and Transformation to ensure the position of the Environment and Sustainability Board in the MPS governance structure is defined and its reporting lines clarified.

The development of the new SMP for 2024/25 was completed during Q4 and will be formally launched in summer 2024. Among senior leaders, it is deemed that economic and social factors are largely considered in MPS activity, but the implications of environmental issues are not always fully understood across business groups.

4. Determining the interventions necessary to optimise the achievement of intended outcomes

During 2023/24, the MPS improved the governance relating to its budget and business planning. At the executive level, there is a monthly Budget and Business Plan Implementation Group (BPIG), which oversees the organisational budget and business planning cycle, is responsible for course correction in year, and will agree progress reporting before it is taken to Management Board each quarter. BPIG is supported by a DAC/Director-level working group and a business group SPOC network.

An MPS Business Plan for 2024/25 was published in July 2024, with work continuing on fully aligned business group-level plans. Ahead of 2025/26, the MPS is uplifting its strategic planning capability and developed a strategic framework that will drive the major choices the organisation needs to make, outlining indicative priorities. This will help drive the right prioritisation decisions and the right detailed budget and resource allocation decisions (with an indicative budget agreed in October). The MPS will also use 2024/25, and the development of effective business planning processes, to inform an improved Force Management Statement, which should provide informed analysis of the expected future demand for MPS services and the resources available to meet it.

The MPS also continues to build a more effective workforce planning capability. New processes have been designed, which are already showing signs of improvement, but there is more to do around improving data accuracy and IT systems to support change and ensuring more consistent posting decisions. The MPS also plans to develop a formal rotation policy to support the flex of resource where needed, rebalance resources through monthly posting panels, and rebalance officer/staff ratios through civilianisation.

Additionally, the MPS has implemented a new performance framework that will enable and track progress against the organisation's mission of More Trust, Less Crime and High Standards. The framework is based on three pillars: Strategic Outcomes, Activities and Enablers, underpinned by metrics that will provide a pan-London overview. There are also local performance frameworks that ensure allow operational oversight and delivery.

The second phase of the Connect programme was rolled out in February 2024. Building on learning from the first phase, governance for implementation was improved, training was delivered face to face, and 'super-users' were better trained and seconded to the programme.

A DARA review of SO18 Aviation command, which focused on Strategic Planning and Delivery, identified that there were governance arrangements in place, with clearly defined objectives, roles and responsibilities supported by relevant policies and procedures. There was a need for risk management to be enhanced, to provide more visibility on Working Time Regulations monitoring and duty of care.

Progress towards actions raised for 2023/24

Action	Status
Further embedding enhanced business planning processes.	Processes to be further developed (with a review at Q4 2024/25).
Improve mapping of resourcing to demand, building on Force Management Statement findings.	Analysis and processes in development (improvements to be reviewed Q4 2024/25)
Governance of the rollout of the second wave of CONNECT, learning the lessons of wave one.	Complete – second wave rolled out in February 2024.

5. Developing the entity's capacity, including the capability of its leadership and the individuals within it

In terms of building leadership capability across the organisation, the MPS has:

- Implemented the First Line Leaders programme for substantive officers and newly promoted Sergeants and Band D staff.
- Introduced a mid-level leaders programme for Inspectors and Chief Inspectors and Band C staff, and launched a Senior Leaders Programme at the end of April 2024.
- Developed plans for an MPS Leadership Academy.

The MPS has also continued to develop the practical application of leadership and supervision, making progress in key areas:

- Through the Learning Management System (LMS), the MPS now has the ability to deliver blended and modularised learning and targeted 'bite-sized' learning accessible to all staff at the point of need. This includes a learner pathway for basic driving authorisations, consolidated into a Single Learner Record within LMS.
- The LMS now has enhanced reporting for all supervisory bands and ranks, allowing them to monitor compliance with mandatory training requirements and access management information data to inform decision-making.
- A new performance appraisal system was launched through LMS, which enables the setting and monitoring of performance, objectives and career aspirations.

- The MPS Detective Training Programme (leading to PIP2 accreditation) has been introduced as the organisation’s first fully-blended learning course.
- Following recommendations from the College of Policing and NPCC, a new approach to Public and Personal Safety Training and Emergency Life Saving (based on the provision of one day’s training per year) was launched in April 2024.

Progress towards actions raised for 2023/24

Action	Status
Move to a blended curriculum to allow learners to access digital content at the point of need.	Complete – discharged through LMS.
Improve understanding of workforce capabilities and better linking training to identified needs.	Work underway to improve understanding (with a review at Q4 2024/25).
Address the experience gap through better supervision and continued leadership development.	Further leadership development being rolled out by Q3 2024/25.

6. Managing risks and performance through robust internal control and strong public financial management

The MPS maintains critical governance for internal control and strong public financial management. The structure in place in 2022/23 (fig. 1 in the Appendix) was subject to a review. Following the review, a new streamlined meeting structure was approved and was introduced during 2023/24 (fig. 2):

- Risk and Assurance Board was changed (and refreshed) to become the Audit and Risk Assurance Committee (ARAC) and chaired by a Non-Executive Director (NED). Its role is to ensure the MPS uses risk management to improve corporate decision-making, monitors risks to the delivery of the MPS’ strategic priorities and objectives, and ensures those risks are being managed effectively across the organisation. It will review and maintain an effective system of integrated governance, risk management and internal control.
- Joint Audit Panel continues to provide advice to the MPS and its Commissioner and independent assurance on the adequacy and effectiveness of its internal control environment and risk management framework. It also advises on and assures MPS financial processes.

The MPS has driven a refreshed approach for both these governance forums, agreeing clear roles and responsibilities for each, and ensuring the MPS is making the right strategic decisions, receiving the best advice, and subject to appropriate assurance.

While we continue to make improvements to the Met's governance structure to ensure it is as effective as possible, it is assessed that it is fit for purpose as it stands.

Going forward, and to drive better financial assurance, the MPS now ensures the findings of Grant Thornton’s Value for Money audit (and progress against its recommendations) are reviewed by ARAC, as well as Joint Audit Panel. This is a part of a more strategic approach that brings together

external audit recommendations with DARA's recommendations to ensure the MPS is addressing the fundamental issues.

- The Information Management Group (IMG) has been set up to ensure all MPS information (physical and digital) is ethically and legally compliant throughout its lifecycle (creation through to disposal). It manages information risk, reviews the pipeline of data capabilities and approves any high-risk data capabilities, ensuring data protection, information and cyber security obligations are met and remain with a risk tolerance threshold.

Data is also the focus of an ongoing transformation programme (Relentless Data-Driven Delivery (RD3)), with one aim to improve data governance across the MPS. As part of work to improve data-sharing with partners, the External Business Intelligence Tool was developed to deal with child abuse and powers of police protection.

A significant DARA audit in 2023/24 was on the Grey ICT Estate, covering IT systems unsupported by DDaT and/or are not able to comply with data legislation. Although graded as Limited, significant work has been carried out to reduce the number of systems operating outside of the corporate IT infrastructure, with work ongoing to ensure robust procurement controls are in place.

- Two Executive Committee (ExCo) meetings, chaired by the Commissioner, were established, which sit every two weeks, namely:
 - ExCo: Investment, Transformation & Technology;
 - ExCo: Performance, People & Culture.

In terms of MOPAC oversight, the MPS provides updates to:

- London Policing Board - the Board provides specialist advice and constructive challenge to effectively support the Mayor in holding the MPS to account for delivering wide-ranging reform, as part of its strategic oversight framework.
- Investment, Advisement and Monitoring - the Deputy Mayor for Policing and Crime uses the Investment Advisory and Monitoring meeting (IAM) to oversee the MPS' financial investments and management of assets and ensure all MOPAC investment is managed in accordance with the Police and Crime Plan and the aims and ambitions of the Mayor. The meeting provides an opportunity to scrutinise initial investments, monitor the implementation of investments and track benefits.

Following the 2024/25 budget process, the MPS has strengthened its financial and spending controls. DARA also undertook an advisory review of the MPS Spending Controls Framework to support delivery of essential budget savings and the management of the 2023-24 budget. Further work is planned, including an assessment against the Financial Management Code, as the MPS moves towards implementation of the framework and to strengthen financial governance.

During 2023/24, a significant review of risk management was undertaken in the summer of 2023, which resulted in:

- A refreshed framework for corporate risk management, including risk appetite and tolerance levels; and what is needed to build and embed a stronger risk management culture and improve risk maturity across the MPS. Guidance and role profiles have been circulated to all senior leaders and the Strategy team engages with the business to offer support and best practice.
- A refreshed corporate risk and issue register, aligned to NMfL.
- A new deep-dive process to ensure we better understand and more effectively address corporate risks and issues.

The MPS also started work to improve assurance activity across the organisation. Work to date has included:

- The initial development of a Corporate Assurance Framework to provide guidance and support to business groups; and
- With DARA, the creation of a dedicated Frontline Policing assurance function. This function is being monitored as a pilot, with a view to it being the template for other business groups to have their own assurance functionality.

Corporate operational policies were reviewed, with a two-year review cycle in place to look at both policy and standard operating procedures. This is now being widened to include business processes and policies, improving governance across the MPS.

DARA undertook follow-up audits and graded the MPS as Adequate in:

- Firearms Licensing – risk management has been strengthened with more transparency around accepted risks; and
- Accounts receivable – the Financial Assurance Framework has been strengthened to provide greater assurance over the management of risks to ensure accurate, complete and timely income collection.

Progress towards actions raised for 2023/24

Action	Status
Embedding a Level 2 Assurance capability within Frontline Policing Development Unit (FLPDU).	Delivered through Frontline Policing assurance pilot, linked to the corporate framework (expected by Q3 2024/25).
Implement BCU/OCU Organisational Learning Hubs.	Underway as part of Organisational Learning programme, continuing until 2025/26 (review at Q4 2024/25).
Train business groups to strengthen Risk Maturity and improve functions' management of risk.	Ongoing, with improvements expected by Q3 2024/25.
Finalise the review of corporate policies.	Work commissioned and underway (to be completed by Q4 2024/25).

Improve data-sharing and risk management in partnership work.	Complete – through the creation of the Business Intelligence tool
Improving compliance and understanding of data responsibilities across the organisation and reducing the resource intense burden of reducing data	Part of the RD3 programme, supported by Information Management Group (improvement expected Q2 2024/25).
Completing a review of Public Protection Policies and widen to look at the Head of Profession Investigation portfolio.	Policies are being further reviewed as part of Strengthening Public Protection transformation programme (to be completed by Q4 2024/25).

7. Implementing good practices in transparency, reporting, and audit to deliver effective accountability

Audit and inspection processes are now well established in the MPS, having been reviewed in 2022/23. HMICFRS recommendations and Areas for Improvement (AFI) are:

- Collated on a central tracker; and assigned to the most appropriate overall senior MPS lead, with an initial action plan;
- Shared with MOPAC within a set timeframe; and
- Updated quarterly, including through the HMICFRS Monitoring Portal.

With regard to internal audit, high-risk actions are tracked by Strategy and Transformation and reported to the MPS ARAC and the Joint Audit Panel. Outstanding actions are reviewed by the relevant senior lead on a quarterly basis. The MPS Strategy team has regular meetings with DARA and advise the business on risk interventions to meet their audit action delivery targets.

External audits are undertaken by Grant Thornton and owned internally by MPS Finance. The MPS intends to bring external audits and DARA audits closer by improving governance and monitoring, specifically through the MPS' ECAP, with oversight through ARAC.

Following a thorough review of commercial contracts, safeguards are now in place to ensure the MPS can meet ICO Consensual Audit recommendations, with better management of data processing contracts and commercial engagements where data processing is a key feature.

The MPS' organisational learning environment continues to improve, developing an organisational learning app to capture, analyse and share learning, and building 47 functioning organisational learning hubs to triage learning. Full roll-out of these two initiatives is scheduled for Q2 2024/25. The MPS has reintroduced a corporate Organisational Learning Board to triage escalated learning and will embed organisational learning analysts in key decision forums, such as strategic Gold Groups. The Board will support Performance Group with key data.

Progress towards actions raised for 2023/24

Action	Status
Ensure all Commercial Contracts where data processing is required are Data Protection Act (DPA) (2018) compliant.	Complete – all contracts are now compliant.
Implement the Organisational Learning model and a clear framework on how learning is shared organisationally.	Long-term programme continuing until Q4 2025/26.

Improvement Plan

Following on from last year, for 2024/25, the MPS will continue to take a more strategic approach to its governance improvement plan. Actions carried over from 2023/24, and newly identified issues, will be captured in the MPS' ECAP. The ECAP sets out the MPS' progress against the underlying strategic issues identified by DARA. It will outline a path to completion and an anticipated completion date. Its delivery is intended not only to address long-term strategic issues but also improve the MPS' annual audit rating from Limited to Adequate. The ECAP will bring together into a single document DARA, Grant Thornton and relevant HMIC recommendations, as well as existing governance improvement activity.

The MPS has worked closely with DARA to clearly articulate tangible actions and controls in the following thematic areas:

- Strategic framework (including business planning) – this work is ongoing, with the 2024/25 Business Plan delivered in June 2024, and the strategic planning framework in July 2024. This will be further developed through 2024/25;
- Further development of the governance, risk and assurance capability, with training and development identified;
- Managing cultural and organisational change, which is being driven through NMfL;
- Improving demand and resource allocation;
- Managing capacity and capability;
- Improved Supervision, primarily managed through a new strategic workforce plan;
- Building a corporate policy and process capability;
- Development of organisational learning capability continues;
- Demonstrating effectiveness (including measurement of outcomes); and
- Information management, data quality, and Digital Capability.

Declaration

In 2024/25, the MPS will take steps to address the matters raised in this document to further enhance its governance arrangements. The MPS is satisfied that these steps will ensure that MPS governance processes are effective in a changing environment. The MPS will continue to monitor their implementation.

Sir Mark Rowley QPM
Commissioner of Police of the Metropolis

19 December 2024

Appendix: Background and Governance Framework

Scope of responsibilities

The Commissioner of Police of the Metropolis is responsible for the governance of the MPS, including maintaining appropriate governance and risk management processes, and for ensuring there is a sound system of internal control which facilitates the effective exercise of these functions. The Commissioner is required to appoint a professionally qualified Chief Financial Officer (CFO) for the MPS. Under the Police Reform and Social Responsibility Act 2011 the CFO has a personal fiduciary duty for the proper financial administration of the MPS. As an independent legal entity or corporation sole, the Commissioner is required to produce an Annual Governance Statement.

Accountability

The Mayor of London and the Deputy Mayor for Policing and Crime holds the MPS to account against the Mayor's Police and Crime Plan. The Mayor's Office for Policing and Crime (MOPAC) holds the Commissioner to account for efficient and effective policing, management of resources and expenditure.

Governance Framework

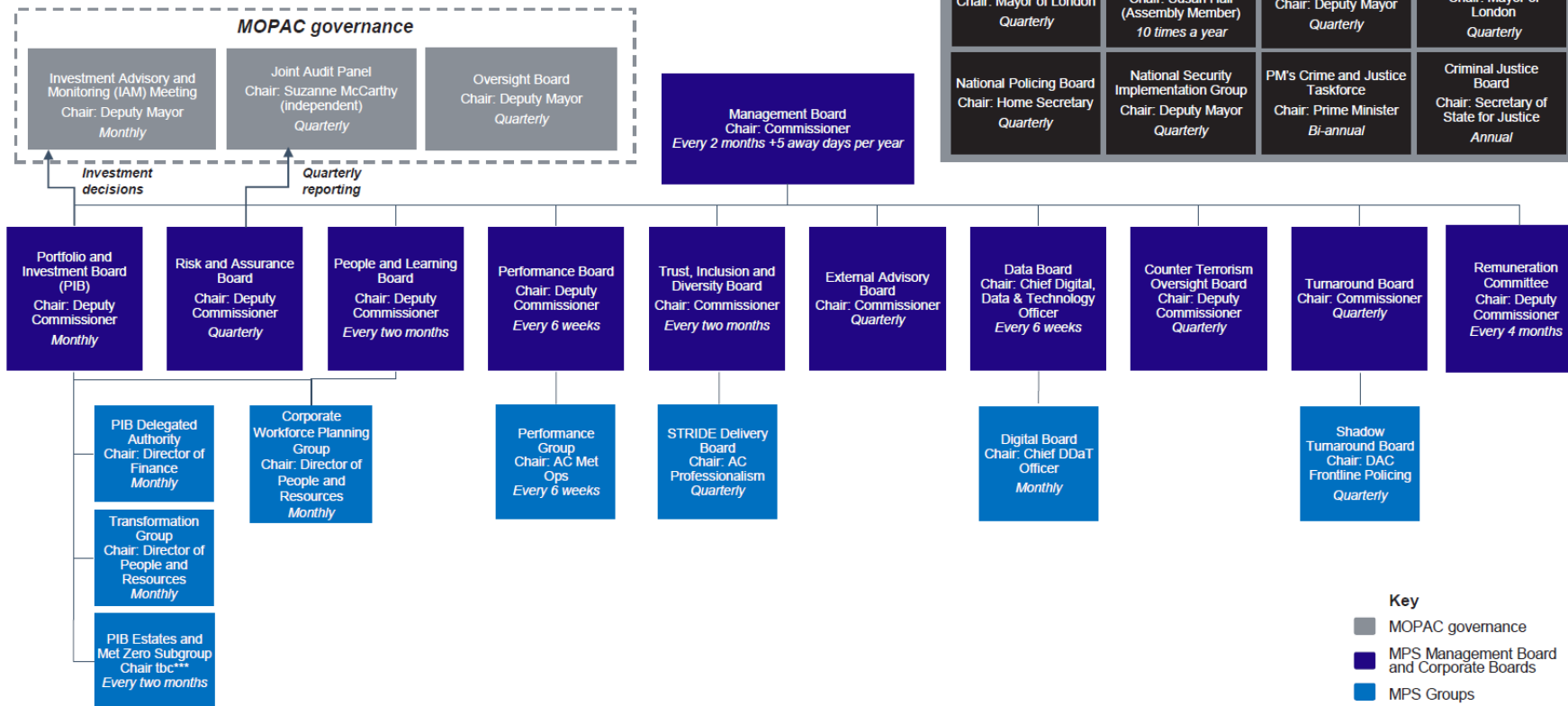
The MPS has developed its governance model in accordance with CIPFA/International Federation of Accountants (IFAC) Framework for Good Governance in the Public Sector (July 2014), and subsequent CIPFA/SOLACE Delivering Good Governance in Local Government Framework (April 2016) and Guidance for Policing Bodies in England and Wales (July 2016). This AGS explains how the Commissioner of Police of the Metropolis has complied with the Code for the financial year 2022/23, and meets the requirements of section 6 of the Accounts and Audit Regulations (England and Wales) 2015 in relation to the publication of a statement on internal control.

In adopting this framework the MPS accepts that:

- Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.
- The fundamental function of good governance in the public sector is to ensure that entities achieve their intended outcomes while acting in the public interest at all times.

The MPS is statutorily responsible for conducting, at least annually, a review of the effectiveness of its system of internal control. This takes place between January and April.

“As is” MPS governance structure*



*Information has been sourced from MPS Strategic Secretariat Corporate Board structure chart except where stated, and covers Corporate Governance to MPS Group level only.

**Information sourced from MPS External Relations team.

*** Informed that the group has not met recently, so unclear who current Chair is (ToR states Chief of Corporate Services).

Figure 1: 2022/23 Governance Model

1. New Governance Model

(as at 1st September 2023)

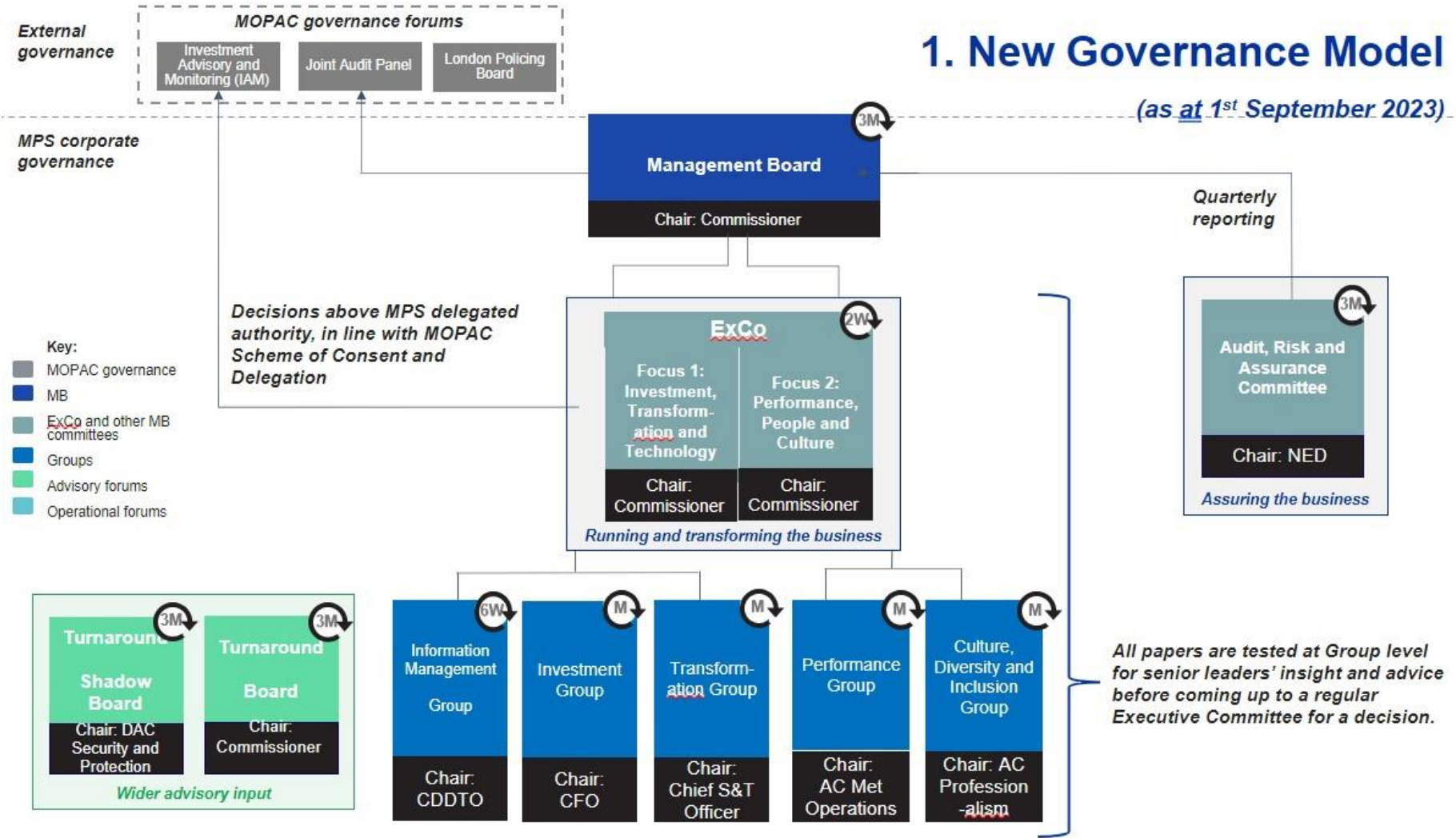


Figure 2: 2023/24 Governance Model