



Local Code of Governance

Metropolitan Police London

2016/17

This Code of Governance (Code) sets out the governance structure, processes and procedures in place to enable the Metropolitan Police Service (Met) to carry out its functions effectively. It is framed within the CIPFA/SOLACE Framework 2016 with due regard to the Met's operating environment. The overall aim is to ensure that resources are directed in accordance with agreed policy and priorities, that there is sound and inclusive decision making and that there is clear accountability for the use of resources to achieve desired outcomes for our communities.

Additionally the Met conducts an annual review of the effectiveness of its system of internal control and publishes a statutory Annual Governance Statement (AGS) with the Met's Statement of Accounts. The AGS reports publicly on compliance with this Code and aims to provide assurance that the Met is monitoring and managing governance arrangements set out in the Code effectively. The AGS further outlines how the Met will make improvements to its governance in the forthcoming year.

Contents

Section		Page
A	Scope of responsibilities	3
B	Our operating environment	4
C	The governance framework	4
D	Met governance	7
E	Glossary of terms	18

A. Scope of responsibilities

The Commissioner of Police of the Metropolis (CPM) is responsible for maintaining the Queen's peace and has direction and control over the officers and staff operating within the Metropolitan Police Service (Met). The CPM holds office under the Crown and is appointed by the Queen on the recommendation of the Home Secretary, having regard to any recommendations by the Mayor's Office for Policing and Crime (MOPAC).

The CPM is accountable in law for the exercise of policing powers and to MOPAC for the delivery of efficient and effective policing, management of resources and expenditure by the Met. At all times the CPM, her constables and her staff remain operationally independent in the service of the public. In discharging her overall responsibilities the CPM is responsible for establishing and maintaining appropriate risk management processes and governance arrangements, and for ensuring that there is a sound system of internal control which facilitates the effective exercise of these functions. This is captured in the Met's Local Code of Governance.

The CPM as an independent legal entity or corporation sole, with direction and control of the force and responsibility for delivering operational policing, is legally required to produce an Annual Governance Statement. The Statement helps MOPAC to hold the CPM to account for efficient and effective policing. The AGS sits alongside the statutory accounts for the Met and gives assurance in respect of the Met's governance arrangements and compliance with the Code. MOPAC produces its own Governance Statement.

Under s.35 of the Police Reform and Social Responsibility Act 2011 in exercising their functions the CPM must ensure that good value for money is obtained. Further s.38 of the Policing and Crime Act 2017 enables chief officers to make the most efficient and effective use of their workforce by giving them the flexibility to confer a wider range of powers on police staff and volunteers (while for the first time specifying a core list of powers that may only be exercised by warranted police officers).

The CPM is required to appoint a professionally qualified Chief Financial Officer (CFO) for the Met. Under the Police Reform and Social Responsibility Act 2011 the CFO has a personal fiduciary duty by virtue of their appointment as the person responsible for the proper financial administration of the Met. This includes requirements and formal powers to safeguard lawfulness and propriety in expenditure (Section 114 of the Local Government Act 1988 as amended by paragraph 188 of Schedule 16 to the Police Reform and Social Responsibility Act 2011 ("2011 Act")).

The statutory responsibilities of the CFO are held by the Director of Commercial and Finance who is a member of the Management Board. Throughout the year the CFO was involved in, and able to bring influence to bear on, all material business decisions in line with the CIPFA "Statement on the role of the Chief Financial Officer (CFO)". The CFO leads the promotion and delivery by the CPM of good financial management so that public money is safeguarded at all times and used appropriately, economically, efficiently and effectively. This requires that the finance function is resourced to be fit for purpose and appropriate management accounting systems, functions and internal controls are in place such that finances are kept under review on a regular basis.

B. Operating Environment

The Police Reform and Social Responsibility Act 2011 established a Police and Crime Commissioner for each police force area across England and Wales. In London the elected Mayor takes the office of Police and Crime Commissioner, through the Mayor's Office for Policing and Crime (MOPAC), and is responsible for the totality of policing in the capital outside of the City of London. Day to day responsibility is delegated to the Deputy Mayor for Policing and Crime (DMPC).

The Metropolitan Police (Met) is responsible for maintaining the peace and is accountable in law for the exercise of policing powers, and to MOPAC for the delivery of efficient and effective policing, management of resources and expenditure. At all times the Commissioner and her officers remain operationally independent in the service of the public.

MOPAC sets the strategic direction of Policing for the Met through the Police and Crime Plan (PCP), taking into account Capital City and national policing functions set out in the Home Office Strategic Policing Requirement. MOPAC hold the Met accountable for delivery against the PCP, whilst the GLA Police and Crime Committee hold the Mayor to account for his responsibilities. MOPAC and the Met have joint governance structures to enable scrutiny and accountability.

The Met develops strategic objectives and a business plan to deliver on policing priorities, and the structure, culture and means to deliver these. In this we work to:

- Embed a governance control framework to ensure that the Met effectively delivers on strategic objectives in the Police and Crime Plan 2017-21.
- Successfully implement our major change programme and deliver significant savings whilst improving service delivery in policing London.

C. The Governance Framework

The Met has developed its governance model in accordance with the CIPFA/IFAC International 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).

In adopting this framework the Met fully accepts that:

Governance comprises the arrangements put in place to ensure that the intended outcomes for stakeholders are defined and achieved.

Achieving good governance in the Met requires effective arrangements for:

- Defining outcomes in terms of sustainable economic, social and environmental benefits.
- Determining the interventions necessary to optimise the achievement of intended outcomes.
- Developing the Met's capacity, including the capability of its leadership and the individuals within it.
- Managing risks and performance through robust internal control and strong public financial management.
- Implementing good practices in transparency, reporting, and audit to deliver effective accountability.

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.

Acting in the public interest requires:

- Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law.
- Ensuring openness and comprehensive stakeholder engagement.

Achieving the Intended Outcomes While Acting in the Public Interest at all Times



CIPFA/IFAC 2014

Met governance model

The Met governance model focuses on recognised frameworks, processes and internal controls that enable the Met to meet strategic objectives and manage challenges. These include:

- Strategic objectives and outcomes
- Strategic planning framework
- Decision making structures and processes
- Financial governance
- Risk Management
- Performance framework
- Assurance framework
- Change governance
- Capability and Skills
- Standards of behaviour
- Stakeholder engagement
- Legal and regulatory compliance

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In developing this Code and the subsequent Annual Governance Statement fourteen key areas of governance have been identified for the Met. The detailed controls below represent those in place at 31 March 2017 and accord with proper practice.

Defining outcomes in terms of sustainable economic, social and environmental benefits	
1	Processes for setting the objectives and targets that support the MOPAC Police and Crime Plan 2017-21 policing priorities, and for defining strategic issues facing the Met.
2	A strategic planning framework for establishing and scheduling operational priorities, finance and resource allocations, transformational change and our roadmap to delivery.
Determining the interventions necessary to achieve the intended outcomes	
3	Decision-making structures and processes that direct and control activity to achieve strategic outcomes and to deliver on strategic plans.
4	Monitoring processes by which performance against operational, financial, change and other strategic plans are considered and key issues identified and tasked.
Developing the Met's capacity, including the capability of its leadership and of individuals in it	
5	Means to identify and meet the development needs of officers and staff in relation to their roles, aligned to Met priorities and supported by training and learning opportunities.
6	Appropriate governance of commercial contracts, partnerships, research relationships and other collaborative working to improve delivery of plans, priorities and outcomes.
Managing risks and performance through robust internal control and strong public financial management	
7	The risk management processes by which the Met identifies and seeks to prevent and mitigate key risks.
8	Effective financial stewardship and financial controls including financial instructions, a scheme of delegation and supporting instruments which define means to manage risks, support service delivery and achieve value for money.
Implementing good practices in transparency, reporting, and audit to deliver effective accountability	
9	Audit and assurance processes by which the Met ensures accountability and assures Management Board, MOPAC and the public that controls are working adequately.
10	Processes for investigating complaints from the public, for identifying potential fraud or misconduct and for reporting against audit, inspection and other recommendations.
Ensuring openness and comprehensive stakeholder engagement	
11	Establishing clear channels of communication and engaging with all sections of the community and stakeholders on priorities, plans and policing activity.
12	Processes for publicising performance, financial and other information and for meeting Freedom of Information and public requests whilst assuring information security.
Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of the law	
13	Ensuring familiarity and compliance with relevant laws and regulations, internal policies and procedures, and ensuring that activity and expenditure is lawful.
14	Developing, communicating and embedding ethical standards, codes of conduct and defining the standards of behaviour for officers and staff.

D. Met governance

1. Processes for setting objectives and targets that support MOPAC's Police and Crime Plan policing priorities, and for defining strategic issues facing the Met.

Key controls to manage this activity:

The MOPAC Police and Crime Plan sets the strategic direction for the Met and other criminal justice agencies in London and outlines the Mayor's policing requirements over a four year period. In response the Met reviews priorities and develops an annual Business Plan. Both take account of the Strategic Policing Requirement in areas of national threat such as terrorism.

With each new administration at City Hall the Met works collaboratively with MOPAC to support a new Police & Crime Plan, and drafts a complementary Met Business Plan to set out how priorities will be implemented. This is informed by our understanding of the future operating environment for policing London, including the GLA's London Landscape analysis, with a particular focus on evaluating demand and the impact of our service on our stakeholders.

https://www.london.gov.uk/sites/default/files/mopac_police_and_crime_plan_2017-2021.pdf

2. A strategic planning framework for establishing and scheduling operational priorities, finance and resource allocations, transformational change and our roadmap to delivery.

Key controls to manage this activity:

Strategic planning enables a corporate view of planned activity across the Met to assure Management Board and MOPAC that there are adequate plans in place to deliver the Met's objectives and the One Met Model 2020 (OMM 2020 transformation programme); to support decision making and risk identification; and to enable the Board to hold leads to account.

Met Business Plan

The Met Business Plan, reintroduced for 2017/18, sets out the Met's contribution to the delivery of the strategic priorities of the MOPAC Police and Crime Plan and plans for operational policing, with specific objectives and milestones for each year. The Business Plan is reviewed annually in conjunction with the budget cycle and in light of policing contribution to the strategic outcomes set by the Mayor. The Business Plan - and an agreed quarterly reporting framework - provides the Commissioner and Deputy Mayor for Policing with assurance on delivery of strategic outcomes and provides senior leaders in the Met with a tool for managing delivery in business groups and against thematic areas within available resources.

Change planning

The One Met Model 2020 sets out how we will transform the way we work over the next five years. The Met must modernise the force and keep our resources focused on priority areas whilst delivering an effective service and a "universal offer" to all Londoners. The OMM 2020 describes how this programme of change will happen and the systems, processes and capabilities required to deliver this.

The Met operates a single OMM change portfolio with 12 strategic change programmes that are designed to deliver the future operating model and capabilities set out in an OMM Blueprint and sequenced in an OMM Roadmap and Level 1 plans. Each programme within the portfolio either aligns to a service within the OMM2020 design or delivers business wide outcomes such as Smarter Working. We continue to strengthen controls and governance with an emphasis on service delivery and benefits realisation - these and other changes to governance bring the Met closer to Government best practice guidance. Management Board regularly reviews the portfolio.

Financial Planning

Financial planning arrangements include an established annual planning cycle within a long-term financial strategy, the development of robust and deliverable budgets, provision of professional financial advice in-year to support decision making and provision of regular financial management information and prompt final accounts. Management Board approves the Met's annual budget for submission to the Deputy Mayor for Policing and Crime. The Met adopts a culture of devolved local accountability whilst promoting effective internal control.

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The Met's Investment Board makes recommendations to the MOPAC/Met Joint Investment Board on spending options of over £0.5M, approves business cases in line with the Scheme of Financial Delegation, and ensures that financial decisions are informed and that risks, impacts and costs/benefits are considered.

3. Decision making structures and processes that direct and control activity to achieve strategic outcomes and to deliver on strategic plans.

Key controls to manage this activity:

Corporate Boards

Joint MOPAC/Met governance processes and internal Met decision making and reporting arrangements are designed to deliver robust Met decision making and MOPAC scrutiny.

Joint Boards include: *Oversight Board* which exercises MOPAC's responsibility for oversight of the Met and initiates, approves and oversees delivery of the budget and key strategies; *Investment Advisory Board* ensures that Met investment decisions relating to goods, services, property acquisitions and disposals are sound; *Joint Audit Panel*, an independent panel, advises MOPAC and the Commissioner on good governance principles, including assurance on the adequacy and effectiveness of frameworks in place to discharge certain legal duties. The Panel receives reports from the Met on significant risks and on audits and inspections, and provides independent advice as to the integrity of the financial statements.

In March 2016, following a review, the Met introduced new Executive decision making structures with a single Executive Board. This new *Management Board* has a standardised agenda as part of a structured annual governance cycle designed to review the health and performance of the business as well as take key decisions on issues. Three sub-boards *Portfolio & Investment*, *People & Training* and *Risk & Assurance* have delegated powers to take decisions or escalate issues to the Executive to ensure decisions are taken at the most appropriate level.

Programme and Project Governance

The Met's Portfolio Transformation Office manage the delivery of all change projects across the organisation. The team is comprised of skilled change and project management professionals working with our strategic partner Deloitte to design and deliver a better Met.

Our governance process around major projects is based on acknowledged public sector best practice and seeks to ensure appropriate governance is exercised over significant investment projects. The process has two key features: the 'Five Case model' for business cases, which ensures the benefits of the project are addressed in a consistent manner; and a 'Gate' process which ensures oversight during the progress of the project.

The Met's OMM 2020 portfolio governance structure fits within the Met's decision making framework. Management Board is the Sponsoring Group for the portfolio through a quarterly deep dive review programme. Projects and programmes in the portfolio report to their respective project and programme boards and through to the Portfolio & Investment Board (PIB). All meet monthly. To support PIB, the Portfolio Management Group (PMG) monitors portfolio delivery such as spend against budget, progress against plans, delivery of benefits, and management of dependencies.

Operational decision making

Every constable is an independent legal entity, the public's guarantee of impartiality. Officers of the crown operate independent of undue influence, interference and with personal responsibility. The Office of Constable means a police officer has additional legal powers of arrest and control of the public given to them directly by a sworn oath and warrant. Each sworn constable is an independent legal official and each police officer has personal liability for their actions or inaction. The chief officer of the force to which the constable is attached has a level of corporate responsibility, as do Board members and nominated roles such as Chief Financial Officer and Chief Legal Officer.

In addition the Policing and Crime Act 2017 gives chief officers the flexibility to confer a range of powers on police staff and volunteers whilst for the first time specifying a core list of powers that may only be exercised by warranted police officers.

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Operational decision making to direct and report against activity defined in strategic plans is undertaken through Chief Officer Groups (COGs) and their equivalent senior leadership team (SLT) structure, with senior supervisory rank officers and staff heading each OCU and BCU. Thematic leadership in areas such as Mental Health and Missing Persons is provided by cross Business Group professional leads supported by long-term problem solving Diamond Groups.

4. Monitoring processes by which performance against operational, financial, change and other strategic plans are considered and key issues identified and tasked.

Key controls to manage this activity:

Performance control

The Met works with MOPAC to define London's Police and Crime Plan, which sets performance priorities and our oversight framework for the coming four years. This includes recognition of the changing nature of crime and police demand, and our increased focus on prevention and vulnerability, on the least safe places and people.

The Met has an established performance framework which connects performance discussions at Management Board through Business Groups to individual Command Units. This has been developed to give line of sight from individuals' objectives to the Met's Strategy and Business Plan. Key controls include MOPAC oversight, Management Board interventions, Business Group 'Crimefighters' performance meetings and SLT's, and Diamond Group thematic analysis. Surveys in public confidence, victim satisfaction and perceptions of crime provide an independent control.

The Met's performance framework is increasingly integrating risk, performance and assurance activity. Our Data team focuses on exploiting multiple sources of information and providing an increasingly automated and intuitive set of management information for colleagues across the Met. Meanwhile our Insight team enhances our analysis, drawing on knowledge from assurance, risk, performance and academic evidence. As we further mature our governance cycle this insight will increasingly influence our strategy, planning and decision making.

OMM 2020

The OMM 2020 portfolio employs a four tier reporting framework. Using a standard monthly structure the projects report to project boards and then by exception to respective programme boards, while the programmes report to Portfolio Investment Board. This ensures that issues are reported once and managed at the appropriate level. On a quarterly basis the portfolio reports to Management Board as part of its deep dive review programme.

A Portfolio Management Group (PMG) looks in greater detail at cross programme issues and dependencies. This will be complemented by a Design Authority to ensure an integrated approach to design across the portfolio and with enabling functions such as Digital Policing, Human Resources and Property Services. Internal reviews assure confidence in the delivery of individual programmes. We intend to extend this assurance regime to include independent external reviews.

Financial control

MOPAC's Police and Crime Plan sets the strategic direction for the Met. In turn the Met's financial governance framework encompasses a long-term financial strategy, the development of robust and deliverable budgets, provision of professional financial advice in-year to support decision making and provision of regular financial management information and prompt final accounts. This is supported by financial governance structures, financial systems, policies, internal controls and assurances across the Met to deliver value for money and achieve a balanced year end budget.

The Met adopts devolved local accountability whilst promoting effective internal control. Management Board members are responsible for agreeing their budgets and maintaining expenditure within this envelope to ensure effective financial control. Members and budget holders are responsible for accurate recording of income and expenditure - in ensuring tight budgetary control they rely on local forecasting and variance analysis within monthly monitoring reporting (MMR). Corporate Finance oversees the whole budgetary planning process and provides a Monthly Management Report (MMR) to Management Board and to MOPAC.

5. Means to identify and meet the development needs of officers and staff in relation to their roles, aligned to Met priorities and supported by training and learning opportunities.

Key controls to manage this activity

The evolving Met People Strategy 2017/20 identifies a significant challenge in thinking radically about how we equip our staff with the right capabilities, skills and knowledge to perform effectively. People development is governed through the executive level People and Training Board, and structures and processes in Strategic HR, the Directorate of Professional Standards (DPS) and the OMM 2020 programme.

The Assistant Commissioner Professionalism (ACP) holds responsibility for the Met's training governance. Development needs of officers and staff are assessed against national standards laid down by the College of Policing in volume and specialist training provision. In commissioning the Met's annual training plan ACP assesses proposed training needs against identified key priorities in a rigorous challenge process. Additional governance is in place to assess externally purchased training through capability requirements and return on investment, prioritised against skill requirements. Each business area is held accountable for the relevance and validity of requested external courses.

The OMM2020 Workforce Futures programme aims to foster cultural and behavioural change, promoting training and learning initiatives such as direct entry, detective career pathways, advanced practitioner and career activism to develop policing skills and raise standards. Programme and project governance is maintained across all strands.

6. Appropriate governance of commercial contracts, partnerships, research relationships and other collaborative working to improve delivery of plans, priorities and outcomes.

Key controls to manage this activity:

Commercial Contracts

The governance of commercial contracts, commercial partnerships and collaborative commercial relationships is vested in the Commercial Directorate which applies Governance through a Target Operating Model (TOM) and organisational structure that ensures that contracts and partnerships are managed by qualified teams supported by a Commercial Assurance Team.

A Third Party Contracts Team manages contractual agreements and receipt of income from all third parties who fund additional policing services. Agreements are managed in accordance with MOPAC's Scheme of Delegation and Consent and the receipt of income is managed in accordance with NPCC charging guidance and MPS financial instructions. Each area of legislation governing receipt of income and the Met's ability to enter into an agreement is overseen by a dedicated team member.

The Contract Management Team comprises a team of Contract Managers and Supplier Relationship Managers who are embedded within the business and who provide dedicated commercial management of the largest contracts and oversight of smaller contractual relationships. Formal governance processes are being established for the major contracts with monthly and quarterly operational meetings and six monthly Chief Officer review.

Category Teams are responsible for the end to end procurement of major goods and services from market engagement to contract award in accordance with MOPAC's Scheme of Delegation and Consent, the Public Contract Regulations, and all associated legislation and regulations. This work includes collaborative procurement with the GLA family, other police forces and 'blue-light' services.

Partnerships

The MOPAC Police and Crime Plan emphasises the importance of working with statutory and voluntary partners in providing support and reducing harm in London. The Policing and Crime Act 2017 places a new duty on police, fire and rescue and emergency ambulance services to collaborate where it is in the interests of their efficiency or effectiveness, and enables Police and Crime Commissioners to take on responsibility for the governance of fire and rescue services.

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Partnership governance is managed according to funding arrangements. The Met's Third Party Contracts Team manage partnerships that involve an exchange of funding, while other partnerships are managed locally with the Met's established Partnership Policy and Toolkit. Financial partnerships are recorded and reported to Board in the budget monitoring process.

The corporate Partnership Policy and Toolkit defines controls for all partnerships that meet agreed criteria in relation to longevity, value, resourcing and risk. The Partnership Management Process (PMP) Policy provides a three stage framework for delivering robust decision-making in entering and closing partnerships as well as effective governance and management. This ensures that the Met makes informed decisions about entering partnerships, and improves operational delivery.

The PMP is mandatory for all new Met partnership arrangements but the full process is only required under criteria including a lifespan of six months or more; a resource of one full-time person or more for six months; it is statutory; or it is expected to involve any corporate high risk factor in the corporate risk register. This ensures that all new Met partnerships are supported by a business case defining benefits, risks, investment, consultation and business impact. Best practice examples are available and a best practice network of 25 partnership leads is in place.

Research Relationships

Research and Evidence Based Policing (EBP) will enable the Met to be more effective by evidencing and socialising what works best and exploring new ways of working. We have set out five key areas to develop controls: governance, the research landscape, internal capability, external relationships, and sharing.

Our research projects and relationships are governed through a control function in MetHQ Strategy and Governance, with individual research projects governed through professional and operational leads as Senior Responsible Officer (SRO). We provide robust governance through an EBP Committee, chaired by the AC Professionalism, that defines research priorities and generates activity, and an EBP Steering Group that manages delivery and champions EBP.

All research and research relationships are registered and validated with the corporate team, including a Research Protocol and Information Sharing Agreements (ISA), and logged in the Met Police Research and Learning Register. Signal academic relationships, such as with UCL and the OU, are governed through respective Board and Steering Group structures in the faculty.

7. The risk management process by which the Met identifies and seeks to prevent and mitigate key risks.

Key controls to manage this activity:

The Met risk management framework is in place to support effective decision making and provide assurance that risk is managed effectively at all levels. The framework operates at three levels - corporate, business group and basic command unit.

An established corporate risk register is refreshed annually following interviews with Management Board members. The risk register is reviewed quarterly by Risk and Assurance Board, chaired by the Deputy Commissioner. Risks are regularly escalated to this meeting from sub-boards namely a quarterly Risk and Organisational Learning Meeting, Health and Safety Board and an Information Assurance and Security Board chaired at AC or senior Director level. Other risks are escalated through a "risk radar" product designed to ensure swift escalation of emerging risks from business group level. Portfolio risks are reviewed and discussed at Portfolio and Investment Board.

Diamond Groups with standard terms of reference, chaired by Commanders, ensure more comprehensive management of significant thematic risk areas and each business group has a risk register which is reviewed quarterly by Chief Officer Groups. Other key controls include a risk management statement that sets out the vision for risk management including the expectations of our leaders, awareness and skills and the risk management framework and approach. This statement is reviewed and approved annually by Management Board. Annual business group maturity assessments are carried out against the Met's risk management maturity model, resulting in implementation plans to drive maturity to the next level.

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The Met is assessed as operating at level 3 risk management maturity. This represents a position where leaders are discussing structured risk information on a regular basis, processes are in place for all elements of risk management and formal reporting and escalation of risk is well established.

Business Continuity:

The Met has plans in place to ensure business continuity following disruptive incidents. Regular risk assessment of pre-planned works and collaboration between stakeholders takes place to ensure that disruption is not caused or that the impact of disruption is minimised in the operational environment. Real time implementation of plans to protect critical activity has been successfully executed in several cases over the past few years.

Insurance:

The Met continues to maintain, develop and renew its insurance programme in order to ensure appropriate cover of risks in accordance with our Insurance Strategy. An annual Stewardship report is completed for MOPAC on renewal outcome and strategy. The Met employs a qualified in-house insurance professional to manage insurance, who in liaison with the appointed insurance broker ensures that all insurance policies are suitable. The insurance manager works with the Met procurement team to ensure that all contracts are procured in line with legislation.

Health and Safety:

The MPS Safety Management System (SMS) is enshrined in the MOPAC/MPS Corporate Health and Safety Policy. All Operational Command Unit, department and business group leads provide assurance regarding their SMS to the Commissioner annually, identifying improvement areas. An annual health and safety letter of assurance is provided by the Commissioner to the Deputy Mayor. The Safety and Health Risk Management Team audit operational thematic and safety management performance whilst the Property Services Compliance Team audit property and fire safety. Met safety governance is coordinated via a Health and Safety Board and reported to Management Board and to MOPAC/MPS Joint Audit Panel.

8. Effective financial stewardship and financial controls including financial instructions, a scheme of delegation and supporting instruments which define means to manage risks, support service delivery and achieve value for money.

Key controls to manage this activity:

Effective stewardship is maintained by ensuring that managers and staff under each Board Member's command are compliant with the relevant regulations, policies and procedural guidance; achieve value for money; and ensure that effective checks and balances exist. MOPAC is responsible for reviewing and updating MOPAC Group Financial Regulations as well as the Good Conduct and Anti-Fraud Policy with the Met and Scheme of Consent and Delegation between MOPAC and the Met.

The Met's Director of Commercial and Finance is responsible for maintaining Financial Instructions. These represent the application and interpretation of Financial Regulations applicable to the Met and are reviewed regularly to ensure that they remain fit for purpose. They are a key element in the financial governance framework developed to define accountabilities, identify how decisions are taken and ensure legal and procedural compliance. Policies and procedural guidance is updated regularly, and accounting policies are reviewed annually with major changes approved by MOPAC.

The Regulations, Instructions and guidance are key to ensuring that the financial affairs of the Met are properly administered having regard to probity, legality and appropriate standards. Our internal auditors the Directorate of Audit, Risk and Assurance (DARA) and our external auditors maintain a keen interest.

9. Audit and assurance processes by which the Met ensures accountability and assures Management Board, MOPAC and the public that controls are working adequately.

Assurance control:

Key controls to manage this activity:

The Met operates the recognised three lines of defence framework which provides assurance at: first line - business operations risk control and performance management; second line -

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organisation oversight functions including serious crime and financial review; and third line - independent and internal audit assurance.

At the third level the Met is subject to planned and unplanned audit and inspection from a number of agencies, the most significant of which are Her Majesty's Inspectorate of Constabulary (HMIC), the Independent Police Complaints Commission (IPCC), internal audit through the Directorate of Audit, Risk and Assurance (DARA), and our external auditor Grant Thornton LLP.

An internal audit plan is agreed annually by Management Board and approved by the independent MOPAC/Met Audit Panel. Progress against the plan is reported to Risk and Assurance Board and to MOPAC/Met Audit Panel quarterly.

10. Processes for investigating complaints from the public, for identifying potential fraud or misconduct and for reporting against audit, inspection and other recommendations.

Key controls to manage this activity:

Complaints and misconduct

Processes for addressing complaints against the police are governed by Acts of Parliament, Home Office guidance and Independent Police Complaints Commission (IPCC) statutory guidance. Regulations introduced in the Police Reform and Social Responsibility Act 2011 and new regulations in the Policing and Crime Act 2017 have prompted revisions to statutory guidance.

Met direction is set by the Professional Standards Strategic Committee (PSSC) which steers response to issues and drives Professional Standards policy. The Met's DPS Complaints Support Team assesses all recorded public complaints and allocates potential misconduct investigations where an officer is alleged to have breached standards of professional behaviour. DPS oversee four reporting routes, accessible to the public and the police, for suspected misconduct or criminal behaviour including reporting online or through the anonymous 'Right Line' 'phone service.

Police misconduct is governed by Police Conduct Regulations and Police Staff Council Joint Circular 54 for misconduct proceedings. The main Met guidance for dealing with complaints is the Met's Misconduct Investigation guide, supported by a Guide to the Local Management of Misconduct Proceedings for Operational Command Units. Gross misconduct hearings are held in public, chaired by an independent lawyer. Misconduct meetings are held in private, chaired by a senior police officer, although information on misconduct procedures must be published.

The Policing and Crime Act 2017 has reformed disciplinary and complaints systems by giving the Police and Crime Commissioner (PCC) explicit responsibility for ensuring the effective and efficient delivery of the local police complaints system, and making PCCs the appellate body for appeals (previously heard by Chief Constables). The Act also gives PCCs the option of responsibility for the front-end of the complaints system and for all duties regarding contact with the complainant.

Fraud and misconduct

All Met officers and staff have a commitment to uphold the highest ethical standards of behaviour. These standards are set out in the College of Policing code of ethics and the GLA code of conduct. The Deputy Mayor for Policing and Crime and the Commissioner are responsible for maintenance of an anti-fraud, anti-corruption and anti-bribery strategy which applies to all staff under their operational control. The MOPAC/Met anti-fraud strategy forms part of our corporate governance arrangements and provides a framework to co-ordinate activity. Deliverable outcomes are reviewed by a Fraud Forum and reported to MOPAC/Met Joint Audit Panel.

Financial Instructions set out expected standards of behaviour and action when suspected fraud is discovered. Prevention techniques include clear and concise policies and procedures, training in fraud awareness and effective fraud risk management. Controls also include well publicised arrangements to facilitate confidential reporting such as 'Right-Line'. DARA operate a dedicated fraud team with the expertise to undertake fraud investigations where necessary. The Met is also part of the National Fraud Initiative which matches data between key organisations in the public and private sector to identify potential irregularities for investigation for fraud or other errors.

Audit and Inspection reporting:

Regular reports are submitted to Risk and Assurance Board and to MOPAC/Met Joint Audit Panel. These provide assurance that audit and inspection recommendations are being addressed and serve to highlight exceptions. There is a particular focus on any audit that attracts a “limited” assurance rating from our internal auditor DARA or a “requires improvement” rating from HMIC. Senior leads are in place for all audits and inspections and are accountable for ensuring that areas for improvement are addressed within agreed timescales.

11. Establishing clear channels of communication and engaging with all sections of the community and stakeholders on priorities, plans and policing activity.

Key controls to manage this activity:

Community Engagement and Confidence

The College of Policing model of engagement requires the Met to actively seek views and opinions on policing, involve stakeholders and communities in problem solving, and to have formal feedback processes. The model exists to ensure clear channels of communication. The Met works with MOPAC to discharge its statutory duty of public consultation across London, and to engage with all of London’s communities.

The Met has developed and academically validated a robust Confidence Model to understand and respond to factors impacting public confidence in policing. There are four strands: engagement; combating anti-social behaviour; fair treatment; and effectiveness in dealing with crime. A Met Confidence Board oversees the Met’s strategic confidence plan and directs activity against MOPAC’s public confidence parameters. Each Borough Commander leads a confidence plan which is responsive to local issues, steered through local Crimefighters performance forums.

MOPAC’s Police and Crime Plan defines priorities including community engagement to identify, and problem-solve local priorities and communicate activity. The Met’s Community Engagement Strategy underpins activity across the organisation. Met engagement is informed by analysis of an established London Public Attitude Survey, and through public Borough Boards and Ward Panels. The Ward Panel, a representative group that informs policing priorities, is often supplemented by virtual Panels to allow a wider range of representation and involvement.

As a global city many residents and visitors identify with broader communities as well as with a geographical neighbourhood. The Met’s community profiles scope these networks to inform service delivery and communication channels. Other areas of business, such as the Trident Gangs Command, have established community reference groups or independent advisory groups. The Met monitors global events and employs processes to respond to incidents including engagement and communication plans for the aftermath of a terrorist incident in London, and a plan and messaging process to alleviate fear, tension and hate crime following overseas incidents.

Public Access and Engagement

The Met’s Directorate of Media & Communications (DMC) works to a strategy approved in 2016, which supports the Met’s Business Plan 2017/18 in delivering against priorities identified in the MOPAC Police & Crime Plan. Progress reports are regularly reviewed by Management Board.

The Met’s OMM 2020 Improving Public Access and First Contact Programme Board provides governance around projects to develop digital and social channels for delivering service to the public from contact to court. The Met’s Public Access Strategy has been developed and validated through qualitative public research and engagement with internal stakeholders. The strategy includes plans to accelerate digital access to policing services, the development of digital 101 channels, and a social engagement strategy focused on London’s communities. A key enabler is a new internet platform for 2017. Director DMC is SRO for the development of the Met’s website, with the Project Board reporting to the Public Access Board.

12. Processes for publicising performance, financial and other information and for meeting Freedom of Information and public requests whilst assuring information security.

Key controls to manage this activity:

Publicising Information

The Met's Publication Scheme publishes information of public interest that may otherwise be subject to a right of access request under the Freedom of Information Act. The Scheme promotes access to documents from the 'your right to information' link on the Met website. There are a number of information classes:

- *Who we are and what we do:* includes the Met's organisational structure and key personnel.
- *What our priorities are and how we are doing:* service-level documents on strategic aims, objectives and plans, and performance information.
- *How we make decisions:* the ratified minutes of open strategic decision making meetings.
- *Our policies & procedures:* these establish expected organisational behaviour in line with our objectives. Some exempt material in this class should not, in the public interest, be published.
- *List and registers:* includes gifts and hospitality registers, business interests, Met contracts and media contacts.
- *What we spend and how we spend it:* includes Chief Officers' travel and hospitality expenses.
- *The services we offer:* includes the Met general fees and charges and the Met rates for special services for police.
- *Other information:* includes other material that is likely to be of significant public interest.

Media and Communications

The Directorate of Media and Communications (DMC) media policy mandates openness as a guiding principle. DMC operates a 24 hour staff media bureau to manage significant news, and sets corporate policy for our 500 plus social media feeds. DMC supports operations and investigations through press releases, social media campaigns, press conferences and media interviews. This includes incidents that attract significant media interest, news programmes and social media channels. DMC offer guidance on marketing campaigns that target hard to reach audiences and help the Met to engage effectively through crime prevention materials.

The Met's internal communications channels include features, news, forums and blogs on the Met's intranet, operational and people notices, the Job magazine, Commissioner's forums, Commissioner's all-staff briefings and our Excellence in Total Policing awards. Leaders are involved in regular leadership communications events and activities.

FOIA and public requests

The Met's Information Management Strategy sets out objectives for information management. The Information Assurance and Security Board (IASB), chaired by the Met's Senior Information Risk Owner (SIRO), is responsible for information management including Data Protection and Freedom of Information compliance. It meets six weekly and receives regular performance reports on information management and security. The IASB through the SIRO is responsible for information risk management, and the SIRO is supported in this by Information Asset Owners in each key business area. The SIRO reports to the Risk and Assurance Board chaired by the Deputy Commissioner. During 2016/17 AC Professionalism held the role of SIRO.

13. Ensuring familiarity and compliance with relevant law and regulations, internal policies and procedures, and ensuring that activity and expenditure is lawful.

Key controls to manage this activity:

Law and regulations

Processes for ensuring compliance with relevant law and regulations are well established. All reports to Management Board, Executive Boards and MOPAC must consider legal implications. The Director of Legal Services (DLS) advises Management Board, and a DLS representative

Not Protectively Marked

advises other strategic boards. DLS hold weekly risk management meetings and advise Gold Groups established to develop solutions to significant risks and issues.

The MetLaw reception desk monitors requests for external legal advice, with emergency out of hours legal advice available. The Met routes all requests for legal advice via an access to legal services process thereby providing a quick self-help facility, better control and join up of services.

DLS ensure that there are no significant liabilities arising from legal non-compliance included in the financial statements. All actual or potential litigation or claims are correctly recognised in the Statement of Accounts as provisions or contingent liabilities where they meet Accounting Standards criteria. DLS reviews individual claims and assesses settlement and cost. The MOPAC Scheme of Consent and Delegation gives authority to the DLS to approve the settlement of claims, with all significant claims requiring MOPAC approval.

Policy

The Met's policy framework informs progress of all policy development work. The quarterly Commissioner's Policy Forum reviews and approves high risk policies in accordance with the corporate policy review plan. Medium or low risk policies are approved by Chief Officer Groups at business group level. All policies are subject to equality impact assessment carried out with guidance from the Corporate Policy Unit to ensure that the Met meets its public sector duty under the Equality Act 2010. Met policy is accessible via our intranet site PolicyPages.

Financial activity and lawful expenditure:

Processes for ensuring compliance with relevant law and regulations are well established. The MOPAC Scheme of Consent and Delegation gives the Met authority to spend. The Met's Director of Commercial and Finance is responsible for maintaining Financial Instructions, a key element in the financial governance framework developed to define accountabilities, identify how decisions are taken and ensure legal and procedural compliance. Reports to Met Management Boards and to MOPAC must consider financial implications.

Environmental:

The Met is committed to environmental sustainability through responsible management of the organisation's environmental impacts. This is implemented through an environmental management system (EMS) in response to policy and legislative review including Mayoral strategies and targets. An annual Sustainability Management Programme (SMP) provides the framework for implementation, and progress is monitored through the Environment and Sustainability Governance Board to ensure that we are meeting our environmental commitments and delivering continuous improvement. Performance is reported annually through the Met's Environment and Sustainability Report.

14. Developing, communicating and embedding codes of conduct and defining the standards of behaviour for officers and staff.

Key controls to manage this activity:

Standards of Behaviour and Ethics

Standards of behaviour and ethics are governed through national and force protocols. The Police Code of Ethics provides for standards across policing in England and Wales. It has legal status, with operating principles to assist decision making and action: accountability, fairness, honesty, integrity, leadership, objectivity, openness, and respect and selflessness. The Met's Values – integrity, professionalism, courage and compassion – and Professional Standards policy align with those in the Code of Ethics, supported by a practical guide including standards expected against each value and examples of positive and negative behaviours.

The Met's Directorate of Professional Standards is responsible for ensuring that all officers and staff adhere to professional standards and codes of conduct, for adopting a transparent approach to professional standards to ensure public confidence in the Met's response to their complaints and to effectively deal with poor behaviour by officers and staff. Improvement of ethical standards is delivered through the DPS Prevention and Reduction Team (PaRT) whose officers are aligned to OCU's in order to deliver consistent training and support to local professional standards teams.

Culture and Behavioural change

The Total Professionalism Programme (TPP) is the Met’s cultural and behavioural change programme, led by AC Professionalism and governed through a Total Professionalism Board. The programme aims to ensure that Met culture is aligned with organisational objectives and priorities, with Met values and behaviours and the national Code of Ethics for policing. The programme works to embed the Met’s Values, fostering professional accountability and personal responsibility to champion positive behavioural change.

The Met’s Leading for London (LfL) programme, governed through an LfL Authority Board, identifies the leadership and cultural needs of the Met and develops training to transform culture, build leadership capability and support broader change. It is intended as a lever to drive positive behaviours, embedding people management skills defined in our leadership framework and creating opportunities to develop better working practices, to empower staff to communicate and engage more effectively with Met and public audiences.

The OMM2020 Workforce Futures programme, governed through a Programme Board, also aims to foster cultural and behavioural change. This addresses issues such as direct entry, detective career pathways, advanced practitioner and career activism to further develop policing skills and raise standards. Programme and project governance is maintained across all strands.

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E Glossary of terms

ACRONYM	DEFINITION
AC	Assistance Commissioner
ACPO	Association of Chief Police Officers
AGS	Annual Governance Statement
BCU	Basic Command Unit
(B)OCU	(Borough) Occupational Command Unit
CAIU	Civil Actions Investigation Unit
CCoA	CIPFA Common Chart of Accounts
CFO	Chief Financial Officer
CIPFA	Chartered Institute of Public Finance and Accountancy
CPM	Commissioner of Police of the Metropolis
CST	Complaint Support Team
DAC	Deputy Assistant Commissioner
DARA	Directorate of Audit Risk & Assurance
DLS	Directorate of Legal Services
DP	Digital Policing
DPA	Data Protection Act
DPS	Directorate of Professional Standards
EBP	Evidence Based Policing
EIA	Equality Impact Assessment
EMS	Environmental Management System
FBP	Finance Business Partners
FoIA	Freedom of Information Act
HMIC	Her Majesty's Inspectorate of Constabularies
ICF	Integrated Client Function
ICT	Information and Communication Technologies
IFAC	International Federation of Accountants
IPCC	Independent Police Complaints Commission
IASB	Information Assurance and Security Board
MET	Metropolitan Police Service
METSEC	MPS Security
MMR	Monthly Monitoring Reporting
MOPAC	Mayor's Office for Policing and Crime
MPS	Metropolitan Police Service
NPCC	National Police Chiefs' Council
OCU	Operational Command Unit
OMM 2020	One Met Model 2020
PaRT	DPS Prevention and Reduction Team
PDD	Professional Development Day
PSSC	Professional Standards Strategic Committee
RSA	Royal Society for the encouragement of Arts, Manufactures and Commerce
SMP	Sustainability Management Programme
SMS	Safety Management System
SOLACE	Society of Local Authority Chief Executives
SOP	Standard Operating Procedures
TNO	Total Notifiable Offences
TPP	Total Professionalism Programme
VfM	Value for Money