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Strands	Activity/ Documents	Owner	Existing Framework	Planned Activity	Delivery Date/Current Status
STRATEGIES AND POLICY	MPA Standing Orders	MPA Chief Executive	Set the regulation framework for the MPA and the MPS.	Standing orders to be reviewed following development of new governance structure for policing.	Jan – March 2011 This will be addressed in the MOPC Scheme of Consent.
	Good Conduct and Anti-Fraud Policy	Director DARA	Policy in place and approved on 28 July 2007. It sets out the expectations of the MPA in relation to conduct and behaviour in the MPA and MPS. It is currently available on the MPA website and can be accessed via the MPS Aware system.	The principles in this policy to be communicated at fraud awareness events planned for Jan/Feb/Mar 2011. This policy will be part of the publicity launch alongside the anti-fraud strategy to reach wider audience.	Jan –March 2011 Completed
	5Ps Presence Performance Productivity Professionalism Pride	MPS Management Board	This is owned by MPS Management Board and progress is regularly reported through to Full Authority and other committees.	Ongoing internal publicity reinforcing importance of the 5Ps message.	On-going Completed
	Anti-Fraud Strategy	Director of Resources Director DARA	The strategy linked with this implementation plan has been drafted and was approved at MPS Governance Board on 8 November and MPA Corporate Governance Committee on 2 December.	Publicity launch planned, communication across the MPA/MPS including articles in the Job magazine/bulletins on the Aware system.	Jan – March 2011 Completed
	Directorate of Professional Standards (DPS) Anti Corruption Strategy	Commander DPS	The strategy is in place for how DPS deal with anti-corruption in the MPS. This incorporates a performance framework and success measures with lead officers allocated to strategic objectives.	As part of the publicity launch, the anti-corruption strategy will form part of the holistic approach being led with the anti-fraud strategy.	Jan-March 2011 Completed

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	Fraud Response Plan	Director DARA	Current response plan is incorporated in the Prevention and Detection of Internal Fraud Standard Operating Procedure (SOP). This outlines fraud reporting responsibilities and the investigation activities to be carried out in the event of fraud.	Revised and updated Prevention and Detection of Fraud SOP due to be published and will form part of the publicity launch.	Nov 2010 – Mar 2011 Completed
	Reporting Wrongdoing SOP	Commander DPS	This SOP approved in 2007 is linked to the relevant DPS policy. It details the process for people to report any wrong-doing including fraud in the MPS/MPA. It remains relevant and up-to-date.	Publicity of the Right-line will be communicated at fraud awareness events and details provided at the quarterly financial awareness training events.	On-going Completed
	Gifts and Hospitality	Director HR	Gifts & Hospitality Standard Operating Procedure published in 2009 in direct support of corporate policy. Individual Business Group register details published on intranet. Policy is monitored annually, i.e. to ensure all Business Groups have registers in place and local systems for monitoring.	SOP due to be reviewed in January 2012.	On-going On track - New procedure introduced for MPS Management Board.
	Business Interests	Director HR	The original policy review was to make it 'People Services' compliant. A further, more comprehensive review, is now taking place. The first draft of the revised SOP has been completed and consultation with key stakeholders has commenced. The Project Manager has been appointed and, although it has not been possible to obtain any dedicated project support, a DI from DPS is assisting the Project Manager on a short-term basis.	A policy review is currently taking place. Consultation began with key stakeholders in October. A Project Manager has been appointed with dedicated project support anticipated. A PID is currently being written first draft to be completed by 18th October 2010. Audit within HR of existing business interests to commence in October 2010.	Oct 2010- March 2011 Completed.

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			The PID has been written and agreed. A copy has been sent to the MPA.	***New Planned Activity*** A management review of existing business interests has commenced and will take 12 months to complete.	April 2012 On track
	Recovery of Losses Procedures	DARA/MPS	The recovery of salary and other overpayments SOP was published in September 2010, with a reminder issued on the intranet on 6 May 2011.	SOPs to be reviewed with anticipated publication in Quarter 3 of 2010.	Oct 2010-Dec 2010 Policy review in progress for write-offs, accounts receivable and chasing down debt. Revised target date August 2011.
	Fraud Awareness Leaflet	DPS/HR/MPA	This is a possible future development which will need agreed budget and timescales for production.	Possible future development.	No further action
RISK MANAGEMENT	Corporate Risk Register	MPS Management Board	There is a corporate risk register in place. A workshop to review the MPS corporate governance risk was carried out in March 2011 and the anti-fraud strategy is now listed as a significant control within the MPS corporate risk register.	Corporate risk register to be refreshed by November 2010 and an improvement plan agreed by the MPS Governance Board.	March 2011 Completed
	Fraud Risk Assessment	MPA DARA	The fraud risk assessment is a dynamic live document that will be reviewed and will inform audit and counter fraud activity.	Fraud Risk Assessment carried out in 2009 to be updated for 2011/12.	March 2011 Completed.

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	DPS Strategic Threat Assessment	Commander DPS	Threat assessment in place and updated monthly/quarterly		On going / On track
	Audit Needs Assessment/ Plan	Director DARA	This is the risk assessment used to determine the Audit Annual Plan which is updated annually.	ANA reviewed for 2010-11 and to be updated in November 2010 for 2011-12.	November 2010 / Completed
PREVENTION	Scheme of Delegation	Chief Exec	Scheme of Delegation (Financial Approval Limits) in place.	Due to be fully reviewed but in light of proposed changes to the governance in policing, no immediate changes will be implemented.	Jan – March 2011 / This will be addressed in the MOPC Scheme of Consent
	Corporate Governance Framework	Director of Resources	• Significant progress has been made on corporate governance, continuing the drive to achieve excellence in corporate governance using the 'temple' model which reflects the current good practice adopted by the MPS. Through this temple, the MPS demonstrates: • that robust structures and processes are in place to enable delivery of our objectives;	Improvements to three areas of the governance work programme: • Decision making structures for establishing priorities and considering strategic issues facing the MPS; • Reviewing and updating standing financial instructions, a scheme of delegation and supporting procedure notes/manuals, which clearly define how decisions are taken and	On-going / On track

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			• close working with the MPA and other partners fundamental to the delivery of quality policing, and • that work is carried out ethically and in a way that meets legal requirements. A detailed gap analysis against elements of the CIPFA/SOLACE framework was fully refreshed in 2010, to ensure that the MPS corporate governance arrangements continue to comply with good practice and remain both relevant and fit for purpose.	the processes and controls required to manage risks; • Ensuring compliance with relevant laws and regulations, internal policies and procedures, and that expenditure is lawful.	
	Annual Governance Statement and Annual Assurance Statement	MPA Chief Executive and MPA Treasurer Director of Resources	An annual review of the effectiveness of MPS governance and internal controls is conducted, outlining any identified areas for improvement. The MPS Annual Assurance Statement is produced as a result of this process, which in turn informs the MPA Annual Governance Statement.	Ongoing annual activity. Areas identified for improvement are monitored quarterly by the Corporate Governance Committee.	On-going 2010/11 Annual Governance Statement drafted.
	Developing Resource Management programmes (DRM1 and DRM2)	Director of Resources	Developing Resource Management (DRM) is a critical change programme - working to improve ways of working and systems to minimise financial waste and maximise governance arrangements. The second phase of DRM is delivering a range of projects, including:	Procurement – Further improving our control and compliance with procurement policies. Cashable savings to be achieved through delivery of identified Strategic Procurement plans. Contract management toolkit, handbook and reporting to be rolled out (initially to DoI and Uniform services).	Quarter 2 2011(revised to on-going) On track

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Strands	Activity/ Documents	Owner	Existing Framework	Planned Activity	Delivery Date/Current Status
			• Corporate Real Estate – introducing new corporate policies and processes to ensure best management and use of the MPS Estate. • Source-to-Payment - new e-tendering system will enhance control and oversight of purchasing and procurement - support contract awarded to IBM in March 2011. • Finance & Resources Modernisation 2 - proposals for improvement agreed by Management Board in May 2011 • Contract management support (toolkit for all, with bespoke training as required) delivered. 'No PO No Pay' policy agreed March 2011, to be implemented September 2011, will ensure compliance, i.e. that spend is planned in advance. Compliance as at April 2011 is 91% (volume) and 94% (value).	*New Planned Activity* Asset Tracking solution for uniforms due to be implemented. Asset Tracking solution for criminal exhibit services. F&R2 project progressing towards implementation.	July 2011 October 2011 January 2012
	Compliance Regime	MPS Management Board	A non compliance framework has been agreed by MPS MB. The three key areas of the requirement are: Organisational Structures	This will be reviewed annually. Relevant articles have been published in recent editions of The Job magazine, including: fraud and corruption, and compliant procurement.	Quarter 3 2011

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			Reporting Standards of Behaviour		Completed
	Recruitment and Security Vetting	AC Specialist Crime Directorate	A security vetting process is in place. The vetting unit has been amalgamated within the specialist crime directorate and there are some outstanding high risk audit recommendations.	A follow up audit is planned by DARA for January 2011. A report on performance framework for vetting considered at November meeting of Corporate Governance Committee.	November 2010 – March 2011 / Follow up Audit commenced in June 2011
	Finance Awareness Training	Director of Resources	In addition to delivering regular FAT courses, a 'Financial Management in the MPS' course now forms part of the Emerging Leaders Programme. 'Finance and Budget Management' courses were delivered in autumn 2010; also a 'Running Your Business' course has been incorporated into the TP Borough Commander's Development Programme	Ongoing regular programme of courses being delivered across the organisation.	On-going / On track
	Fraud Awareness Training	DARA/MPS	Ten workshops already held with 200 employees attended in 2009. Report on outcome considered by Corporate Governance Committee. Second series of 10 workshops delivered between Jan-Mar 2011, with 350 attendees representing all Business Groups (one dedicated to Exchequer Services staff).	Further 10 workshops agreed and planned, letter of engagement signed with the Audit Commission. Pre-workshop survey sent out to attendees. ***New Planned Activity*** Report by Audit Commission on outcomes to be sent to the MPA/MPS.	March 2011 / Completed / Sept 2011
	Procedure and System design (segregation of duties, supervisory checks etc)	DARA/MPS	The MPS has operating procedures in place for main systems. DARA review activity which provides independent assurance of their effectiveness.	MPS and MPA to embed and promote the importance of segregation of duties and supervisory checks as part of anti-fraud strategy and awareness events.	On-going 2011 / On track

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	Audit (internal and external)	DARA/DoR	Audit programme communicated to MPA/MPS. Regular liaison meetings with external inspection bodies(including HMIC and Audit Commission)	Annual plan agreed at Corporate Governance Committee. Robust monitoring of audit recommendations by MPS Compliance and Assurance Team. Regular status reports to MPS Performance Board and MPA Corporate Governance Committee.	On-going On track
	Corporate Induction	Director HR	A Directorate of Professional Standards presentation to all newly recruited PCSOs, DDOs and Custody Nurses. The presentation features a 'hard-hitting' DVD with clips of current MPS staff sharing their experiences of being subject to gross misconduct proceedings. The presentation addresses all areas of disciplinary breaches that could result in dismissal including fraud related offences.	Induction programme to include Directorate of Professional Standards presentation.	Process in place Due to reduced recruitment activity the presentations have been placed on hold.
	Partnership agreements MOU's (Between key stakeholders for Fraud Prevention	MPS/DARA	MOU in existence with professional standards and DARA. Protocol in place with DARA and Directorate of Resources	Update of MOU between DPS and DARA and protocol being refreshed between DARA and Directorate of Resources.	March 2011 Protocol and MOU are being refreshed following changes in DARA's strategic approach. The revised target date is July 2011.

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DETECTION	Audit (Internal and External)	DARA/MPS Management Board	Assesses and evaluates risks and controls.	Analysis of underlying causes of fraud that have been identified through our work. Planned action will include reporting to senior management and ensuring controls are improved in the identified areas to prevent reoccurrence.	On-going On track
	MPA DARA Analytical Team	Director DARA	A rolling programme of work using analytical intelligence techniques to interrogate financial systems of known high risk to ensure controls are effective and provide assurance.	DARA findings reported to MPS management and Corporate Governance Committee.	On-going On track
	MPA DARA Counter Fraud Branch	Director DARA	Counter Fraud Unit in place to deal with detection of fraud with appropriately skilled staff.	A self assessment against CIPFA red book 2 to ensure best practice on detecting and investigating fraud.	March 2012 On track
	National Fraud Initiative	Director DARA	The National Fraud Initiative (NFI) is an exercise that matches electronic data within and between audited bodies to prevent and detect fraud. The MPA/MPS have resolved all matches from the 2008 exercise and findings have been reported to the Audit Commission. Data for 2010 exercise has been supplied to the Audit Commission in October 2010.	To work on the 2010 exercise once the matches have been received from the Audit Commission in Jan/Feb 2011.	2011-12 On going The Audit commission sent out matches in January 2011. This exercise will be completed by Dec 2011.

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	Compliance and Assurance Team (CAAT) Team	Director of Resources	The CAAT has become fully established within Finance Services. Total number of outstanding audit recommendations has been reduced by 50% since November 2010. Regular meetings with Business Group SPOCs maintain a focus on driving through identified areas for improvement. A database of audit recommendations has been enhanced to include risk categorisation.	Database to be further developed to include risk categorisation of audits from other inspecting bodies e.g. HMIC.	Ongoing On track
	IT Security Incident Reporting	Director DoI (Directorate of Information)	There is an MPS Security Incident Reporting scheme in place for the reporting of any IT security incidents, managed within DoI. The Security Incident Reporting, Handling and Investigation SOP is currently subject to review.	The revised SOP due to be published in October 2010.	Revised target date for SOP to be published is June 2011.
	Right Line	DPS/DARA	MPA/MPS jointly owned – Rightline online launched 2009	Right Line (confidential telephone line) and Right Line On-Line (e-mail) in operation.	On going
INVESTIGATION	DARA Counter Fraud Unit	Director DARA	Detects and investigates fraud within the MPA and MPS. Responds to reports of suspected fraudulent behaviour. Appropriately skilled and resourced staff.	In place to deal with fraud investigations reported	In place
	Practice Support Team - Police Staff Discipline Unit	Director HR	Monitors and verifies all cases of gross misconduct. Complex gross misconduct investigation undertaken. Advice given to line managers and discipline board members.	In place to deal with fraud investigations reported.	In place
	DPS	Commander DPS	In place with appropriately skilled and resources staff.		In place

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	MPS SCD6 and Boroughs	Commander SCD6	In place with appropriately skilled and resources staff.	Appropriate fraud cases are referred to SCD6.	
REVIEW AND MONITORING	Case Data Gathering	Commander DPS/Director HR	Current arrangements for reporting fraud and collating instances of fraud are at present fragmented and are sometimes captured under other categories of wrong-doing.	Planned action to improve reporting arrangements and oversight include working with key stakeholders to collate information and report accurately levels of fraud.	March 2012
					On track
	Fraud Forums	MPA DARA MPS Commander DPS and Director of Resources	There is no current anti-fraud forum solely dedicated to internal fraud .that operates within the MPA/MPS.	To improve co-ordination and liaison on fraud, a formal forum on internal fraud will be set up. Key stakeholders to this group include DPS, HR, DARA, DOI (Directorate of Information), Directorate of Resources and Business Groups where required.	2011
					Completed
	NFI Website	MPA DARA	This website is used to record the outcome of the NFI exercise.	The MPA and MPS to continue to participate in the NFI exercise.	2011-12
					On track
	Reports to Corporate Governance Committee	MPA/MPS	Progress reports are made to each meeting on current fraud investigations. Ad hoc reports are made of larger loss/high profile cases.	Reports to continue as required.	On-going
	DARA Annual Report	MPA DARA	Provides DARA annual opinion of the adequacy and effectiveness of the internal	DARA annual report to be presented to June Corporate Governance Committee each year.	On going

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			control framework in the MPS/MPA,		
	Compliance Framework	Director of Resources	Agreed by MPS Management Board in 2009 as a vehicle to align staff perception of integrity with public expectations. Defines escalation process for non compliance. 'Compliance performance' incorporated into MPS Performance Framework for senior ranks.	Continue to develop compliance regime under the prevention strand of this strategy.	Quarter 3 2011
					Escalation process for non-compliance is under development.
	Benchmarking against CIPFA standard in Red Book 2 'Managing the Risk of Fraud'.	Director DARA	An initial assessment has been conducted and necessary actions are included in this implementation plan.	Report outcome of assessment to Corporate Governance Committee.	Dec 2011
					On track
ORGANISA-TIONAL LEARNING	Lessons Learnt from fraud cases	MPS/MPA	An appointment of an Organisational Learning Lead has been made with the creation of an Organisational Learning Forum. Reports by Counter Fraud staff included recommendations to resolve identified weaknesses.	All key stakeholders to participate in the MPS wide Organisational Learning Forum.	Ongoing
					Completed.
	Publicity for proven cases of fraud	Commander DPS/Director HR	Publicity given to suitable proven cases on the MPS Intranet or in the staff newspaper 'The Job'.	Publicity to be included in the launch of the anti-fraud strategy.	2011
					Consideration is given to publicity on all cases of

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					wrongdoing.
	Data to inform Audit Plan	MPA DARA	Data on fraud cases is used to inform the annual audit plan.	Feed relevant data into audit needs assessment and annual audit planning process.	March 2011
					Completed
	Benchmarking of counter fraud unit against other public sector organisations.	MPA DARA	The MPA have taken part in a pilot benchmarking process with other public sector organisations to identify how internal fraud is dealt with in terms of resources/working practices etc.	Feedback to be produced by CIPFA by year end 2010. Will be reviewed to assess usefulness of the exercise and benefits to the MPA.	January 2011
					Completed
	Response to serious cases of fraud	Commander DPS	Gold Groups are formed when required to deal with any critical incidents.	Key personnel attend 'gold groups' where necessary.	On-going
					Gold Groups continue as before.