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Freedom of Information Act Publication Scheme	
Protective Marking	Not Protectively Marked
Publication Scheme Y/N	Yes ☒ No☐
Title	Management of Policy Development in the Metropolitan Police Service (MPS) - Standard Operating Procedures (SOPs).
Version	Version 3
Summary	These SOPs set out the roles and responsibilities of those involved in the creation and approval of corporate policy in the MPS.
Branch / OCU	Strategy and Improvement Department, Directorate of Resources
Date created	February 2011
Review date	February 2014

Management of Policy Development in the Metropolitan Police Service (MPS)

Standard Operating Procedures (SOPs)

Introduction

These Standard Operating Procedures (SOPs) support the policy for the management of policy development in the MPS. They define the terms 'corporate policy' and 'standard operating procedures' and provide an overview of the policy development, monitoring and review process. They also set out the various roles and responsibilities of all those involved in the process.

Application

All police officers and police staff, including the extended police family and those working voluntarily or under contract to the Metropolitan Police Authority (MPA) must be aware of, and are required to comply with, all relevant MPS policy and associated procedures.

However, these SOPs apply in particular to officers and staff in the following roles:

- Members of Management Board
- Designated Business Group Policy Lead (ACPO level or equivalent)
- All those required to develop or review corporate policy
- Heads of Units/Line managers of policy developers
- Policy Co-ordination Unit of the MPS Strategy and Improvement Department
- Diversity and Citizen Focus Directorate
- Directorate of Information
- All those who are engaged in the commissioning, formulation, approval, publication, implementation or review of corporate policy.
- Business Group Policy Co-ordinators
- Safety and Health Risk Management Team

N.B. This list is not intended to be exhaustive.

Contents

These SOPs contain the following information:

Definition of terms
Roles and Responsibilities of (you need only read the section relevant to your role):
- Management Board Members
- Designated Business Group Policy Lead (ACPO level or equivalent)
- Unit Heads/Policy Managers
- Policy Developers
- Business Group Policy Co-ordinators
- Policy Co-ordination Unit, Strategy and Improvement Department
- Safety and Health Risk Management Team
- Diversity and Citizen Focus Directorate
- Directorate of Information

Overview of Policy Development and Review Process (the six stages of the policy development cycle)

Responsibilities
Associated documents and policies

DEFINITIONS

Policy
A policy is a principle, stance or course of action that must be achieved or adhered to.

A policy will generally be a high level statement about what the MPS stance is on a particular issue. Policy statements must define clearly **what** needs to be done and **who** is responsible for doing it.

New policies may be developed as a result of new legislation, strategy or operational requirement.

Corporate Policy
'Corporate' policy / SOPs are those which **affect all or several parts of the organisation.** A Corporate Policy contributes to the corporate strategy. It is reflective of strategic priorities, ensures effective service delivery, and/or enables the MPS to comply with legislation and national policy. It is developed through the corporate policy development process by dedicated policy units or by a project team established specifically for that purpose. It does not include local work instructions.

Corporate policy statements are published externally via the MPS Publication Scheme and must conform to the Policy Statement format.

Standard Operating Procedures (SOPs)
A Standard Operating Procedure details the actions to be taken to achieve the policy.

Whilst the policy statement gives the principles, the SOP explains **how** the principles will be put into practice – it includes the processes, actions, roles and responsibilities and forms required to enable compliance with the policy. There may be more than one set of SOPs supporting a single policy, which describe different or distinct processes.

Policy owners should consider publishing their SOPs via the MPS Publication Scheme if it would be in the public interest or of benefit to the MPS. However, SOPs that are not on the MPS Publication Scheme may be requested under the Freedom of Information Act (SOPs should be classified under the Protective Marking System, using the impact criteria at **METSEC Code GEN1**). All SOPs must conform to the SOPs format.

Local Work Instructions
Local work instructions sit outside of the corporate policy development process, however in order to avoid confusion, it is worth mentioning them here.

Local work instructions, sometimes referred to as 'local policy', is a term used to describe instructions written for a single unit or location (i.e. an OCU, department, business group or building) as opposed to the wider organisation. 'Local policy' will only address an issue peculiar to that unit or location. They must not be produced to supplement, or as an alternative to Corporate Policy, unless there is prior agreement

with the corporate lead. If there are local difficulties implementing corporate or national policy, these should be raised with the relevant MPS business group lead for the policy.

Please note: Local work instructions are not the responsibility of the Policy Co-ordination Unit. People developing 'local policy' and guidance should be aware that they are still required to complete an Equality Impact Assessment, and should recognise the content of this SOP as good practice.

People developing local policy and guidance should be aware of this policy and recognise the supporting procedures as good practice.

ROLES AND RESPONSIBILITIES

Role of Management Board Members (policy owner)

- Make executive decisions on critical and strategic policy issues in line with MPS Values and corporate priorities
- Retain ultimate ownership of and responsibility for policy, monitoring and compliance within their business area.
- Ensure policy issues are properly directed and controlled.

Designated Business Group Policy Lead (ACPO Level or equivalent)

- Commission the development of new policy
- Approve new and reviewed policy and SOPs (on behalf of their Management Board member)
- Drive policy review, implementation and monitoring programmes
- Direct the work of Policy Managers/Unit Heads and Policy Developers to ensure that policy development pursues current corporate objectives and priorities and reflects Service Values
- Review monitoring and compliance results and direct appropriate remedial action, escalating critical and strategic issues as necessary.
- Ensure managers have sufficient resources in place to enable policy developers to develop and review policy effectively

Role of Policy Managers/Unit Heads

General managerial responsibility for policy and policy developers in their business area as follows:

- Maintain an overview of the development, review and monitoring of the policies for which their unit is responsible.
- Ensure policy is necessary, associated SOPs are proportionate and do not place an unnecessary burden on the end user.
- Ensure that audit trails of policy and procedural changes are maintained for continuity purposes and to assist in court cases and disciplinary and misconduct investigations. Copies of document versions, including any interim amendments, must be retained on the registered file and the Shared Drive/File Plan.
- Ensure sufficient resources are available to develop and review policy effectively, and escalate if they are not.
- Ensure policy developers have complied with the corporate policy development process and reflected Service Values and priorities within their policies.
- Ensure appropriate liaison with the Safety and Health Risk Management Team (SHRMT).
- Ensure appropriate engagement with communities and individuals or their representatives impacted by the policy, both internal and external to the MPS.

- Ensure an audit trail of consultation results and decisions is maintained on the registered file.
- Ensure monitoring reports are produced and published as required and in accordance with the Equality Impact Assessment Policy and SOPs
- Ensure policies are reviewed and published at least once every 3 years, if no earlier review has been prompted by monitoring results, or external factors e.g. legislation, critical incidents.
- Ensure all draft documents are suitable for submission to the Business Group Policy Co-ordinator, for onward submission to the Policy Co-ordination Unit for quality assurance.

Role of Policy Developers

- Develop policies in their area of responsibility which reflect Service Values and priorities.
- Write clear SOPs enabling the reader to quickly understand the key messages of what must be done, avoiding unnecessary material which can be provided separately as guidance or good practice.
- Adhere to the corporate policy development process
- Conduct appropriate and proportionate research, consultation and community engagement with regard to each policy (further details in the Corporate Policy Guide - Overview of the Corporate Policy Development and Review Process)
- Consult the Safety and Health Risk Management Team in the development of the policies. It is expected that all MPS policies will contain an explicit health and safety impact statement. Where the policy impacts on the corporate and/or local safety management systems (including the provision of a safe working environment, a positive safety culture, and resources to assist with the implementation of the MPA/MPS Corporate Health and Safety Policy) then the impact is to be captured within the statement. Any identified impact must, where appropriate, be risk assessed and managed accordingly. Where there is no health and safety impact, a statement to this effect must be included. Whilst the policy will contain the impact statement, any relevant control measures will be contained within the SOP.
- Conduct impact assessments (using Equality Impact Assessment Form 6119A(x)) on new policies and procedures under development, on existing policies every 3 years or if major changes are required.
- Develop an appropriate implementation plan containing measures for communicating the policy and identifying additional resource and training requirements.
- Maintain an audit trail of consultation results and decisions and retain all information relating to the development and review of the policy on a registered file.
- Retain an audit trail of all versions of policy statements and SOPs for continuity purposes and to assist in court cases and disciplinary and misconduct investigations. Copies of document versions, including any interim amendments, must be retained on the registered file and the Shared Drive/File Plan
- Identify and/or develop effective and proportionate monitoring processes (measuring diversity impact, compliance, performance and benefits) for each policy and ensure that those processes actually take place.
- Compile monitoring reports in accordance with the Equality Impact Assessment Policy and SOPs, as required.
- Bring any matters of concern regarding policy/monitoring to the attention of Policy Manager and the Business Group Policy Co-ordinator.
- Where appropriate, feedback the results of consultation to consultees.

Role of Business Group Policy Co-ordinator

- Influence decisions on the overall policy direction for the Business Group (BG) - i.e. policies that are focussed on service delivery, BG and organisational priorities; appropriately structured and presented to ensure clear direction to the workforce.
- Ensure good governance so that policies within the BG are reviewed, monitored and published in accordance with equalities legislation (i.e. requirement to review and publish policies every 3 years and publish monitoring reports annually)
- Ensure integration with other BG policy activity
- Raise policy issues with the Senior Management Team for appropriate action/resolution
- Ensure BG policy performance data is provided to the Policy Co-ordination Unit upon request (for preparation of Corporate Health Indicators), and ensure the BG representative at Performance Board is briefed regarding any policy issues of concern
- Ensure new policy is commissioned formally before it is developed.
- Quality assure monitoring reports to ensure they are 'fit for purpose' - in particular, they must be logical, comprehensive, written in plain English and meet relevant legislative requirements (e.g. the Race Relations (Amendment) Act 2000, Disability Discrimination Act 1995 (as amended 2005), Equality Act 2006, Equality Act 2010 and Freedom of Information Act 2000).
- Ensure policy reviews and monitoring reports are completed on time by the policy authors through employing a system of prompts and reminders.
- Collate policy performance data / information for submission to the Policy Co-ordination Unit (PCU), through the Business Group Policy Co-ordinator, upon request.
- Ensure the integrity of policy documents submitted for approval to the Designated Business Group Policy Lead for final approval to publish (i.e. only documents that have successfully completed the quality assurance process, as advised by the Policy Co-ordination Unit, may be submitted).
- Ensure only documents approved by Designated Business Group Policy Lead are submitted to the Policy Co-ordination Unit for publication

Role of the Policy Co-ordination Unit - Strategy and Improvement Department

- Provide the MPS with a consistent corporate policy making process
- Develop and review the policy on the Management of Policy Development in the MPS
- Publish all corporate policy
- Develop and maintain the Corporate Policy Database
- Develop and maintain a site for policy development advice and good practice on the Policy Co-ordination Unit Intranet site.
- Provide advice and support to all involved in the policy development and review process
- Maintain a strategic overview of corporate policy issues and advise Management Board / Performance Board accordingly.
- Provide advice and support to the designated Business Group Policy Lead
- Provide training in the corporate policy development process
- Gather information on the status of policy reviews and policy monitoring

- Provide information as required to Management Board, Performance Board and other key stakeholders on all policy and monitoring issues
- Identify and help to resolve boundary issues for ownership of policy
- Quality assure Policy, SOPs, and Corporate Policy Workbook to ensure all corporate policies are 'fit for purpose' and comply with Service Values, corporate priorities and the corporate policy development process
- Provide the 'gateway' function for the internal and external publication of policy, SOPs, impact assessments and monitoring reports
- Identify and promulgate good practice concerning policy development from within and outside the MPS

Role of Safety and Health Risk Management Team

- Provide advice to policy developers on health and safety impact statements, risk assessments and control measures in relation to the policy and procedures under development.
- Inform the development and maintenance of the health and safety sections of the Corporate Policy Workbook and accompanying toolkit/guidance.

Role of the Diversity and Citizen Focus Directorate

- Provide advice and support to all involved in the policy development and review process with regard to conducting equality impact assessments
- Provide training or guidance in Equality Impact Assessment
- Quality assure Policy, SOPs, and Equality Impact Assessments, to ensure that all corporate policies seek to eliminate discrimination, promote equality of opportunity, good relations between groups, positive attitudes towards others and participation in public life.
- Identify and promulgate good practice concerning equality impact assessments from within the MPS

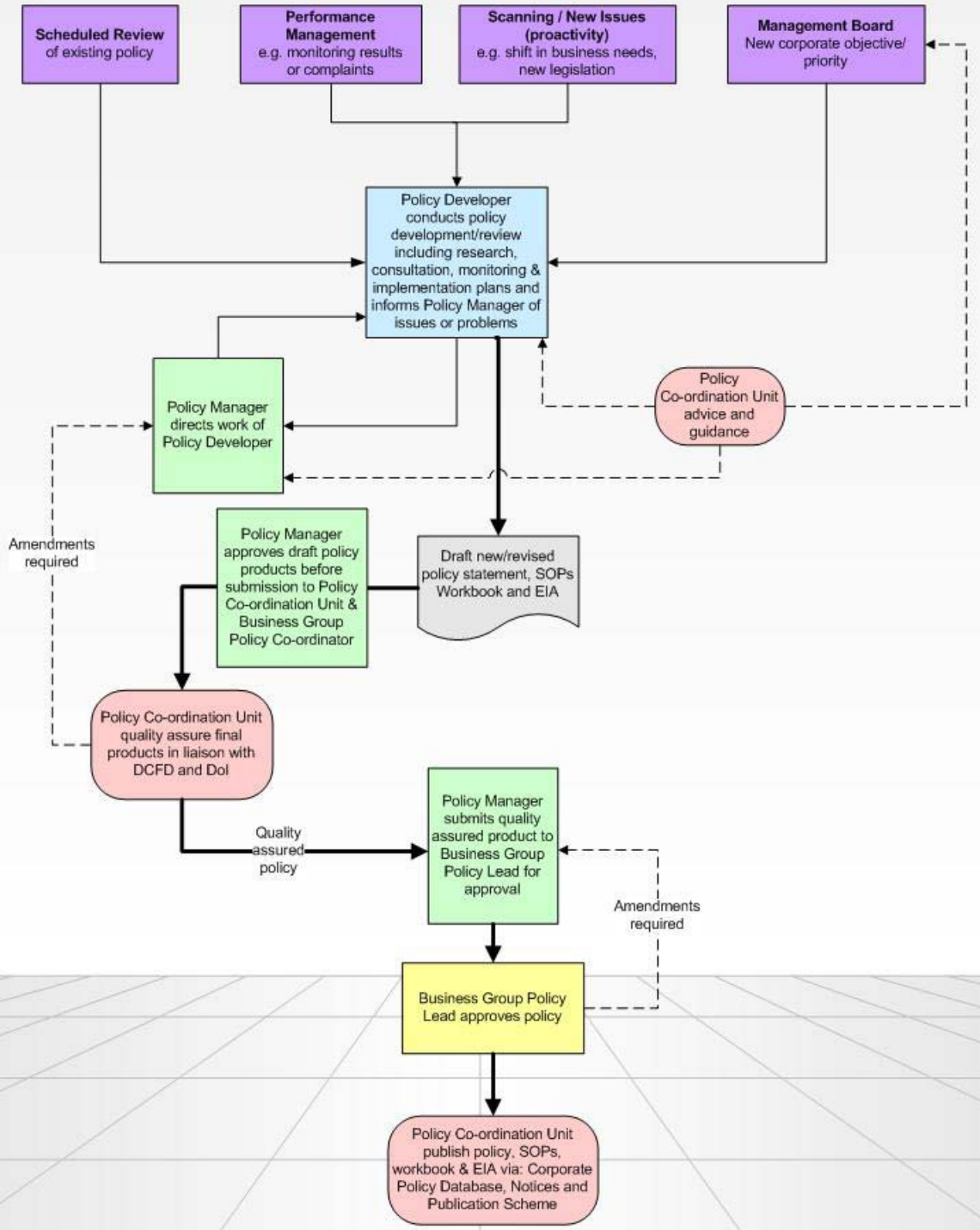
Role of the Directorate of Information

- Inform the development and maintenance of information management sections of the Corporate Policy Workbook (or Checklist) and accompanying guidance.
- Audit policies, SOPs, and Workbook/Checklist from an information management perspective.
- Provide advice to policy developers, or direct them to sources of further advice, where necessary.
- Advise Policy Co-ordination Unit when all policy documents satisfy information management requirements

OVERVIEW OF THE POLICY DEVELOPMENT / REVIEW PROCESS

The chart below illustrates the various roles and responsibilities of all those involved in the corporate policy development process.

Responsibilities in the Corporate Policy Development Process



Corporate Policy Development Cycle

Corporate policy development is a cyclical process consisting of 6 stages:

1. Identification and scoping
2. Commissioning
3. Development
4. Approval
5. Implementation
6. Monitoring and review

1. Identification and scoping

Carry out initial research into the issue to identify:

- the scope of the problem to be addressed - what is the need?
- relevant legislation / strategies / priorities
- any relevant data / statistics (e.g. monitoring results for existing policy)
- cost or resources implications
- benefits analysis

If this is a policy review (rather than new policy), conduct some research to see whether there are any changes to the above.

It is at this stage work should begin on completing the Equality Impact Assessment and Corporate Policy Workbook / Checklist.

2. Commissioning

Once you have established there is a need (or continued need) for the policy, seek formal agreement to progress the work, through the relevant Designated Business Group Policy Lead.

3. Development

Continue the development of the policy and/or standard operating procedure, through consultation with subject matter experts and those affected by the policy. N.B. The Safety and Health Risk Management Team must be consulted. Consider and respond to feedback received. SOPs should be written in a way that suits the user, enabling them to quickly understand the key messages of what must be done.

Like any other project, you should plan your activities. Make sure you start your policy development (or review) project in sufficient time to get it completed, approved and published before the corporate review deadline. Please note: Whilst not a full time activity, you need to allow at least 6 months for a basic review.

Update the Equality Impact Assessment and Corporate Policy Workbook / Checklist following receipt of consultation responses with a summary of the feedback.

NOTE: Any proposed corporate policy that has not been impact assessed using the Policy Workbook/Checklist and Equality Impact Assessment (Form 6119a) is not considered fit for purpose and consequently will not be approved for internal or external publication. MPS personnel will not be held accountable for non-compliance with policy that has not been impact assessed, save for exceptional circumstances such as where a policy has to be introduced to meet immediate operational needs. Such exceptions must be made with the approval of the appropriate policy lead (ACPO level or

equivalent - who will be responsible for any associated risks), in consultation with the Policy Co-ordination Unit. In these circumstances, the impact assessment must be completed as soon as reasonably practicable.

Full details of the impact assessment process are contained in the EIA SOP and the Corporate Policy Workbook and Guide.

4. Approval

Once satisfied the documents are ready for approval, the following documents should be submitted by email to the Policy Co-ordination Unit, copying in the relevant Business Group Policy Co-ordinator for information:

- Policy Statement
- SOPs
- EIA
- Workbook/Checklist

The Policy Co-ordination Unit will co-ordinate the quality assurance process in conjunction with DCFD and DOI, and will notify when the quality assurance process has successfully completed and the documents are ready for formal approval to publish.

The documents should then be sent (if a reviewed document, this should include a summary note of changes) to the relevant Designated Business Group Policy Lead, following the normal business group policy approval process.

5. Implementation

If approval for publication is given, final versions of the above documents are to be sent to the Policy Co-ordination Unit to arrange publication:

- on the Corporate Policy Intranet
- in Notices
- on the MPS Publication Scheme.

If publication is to coincide with a wider implementation plan the Policy Co-ordination Unit should be advised.

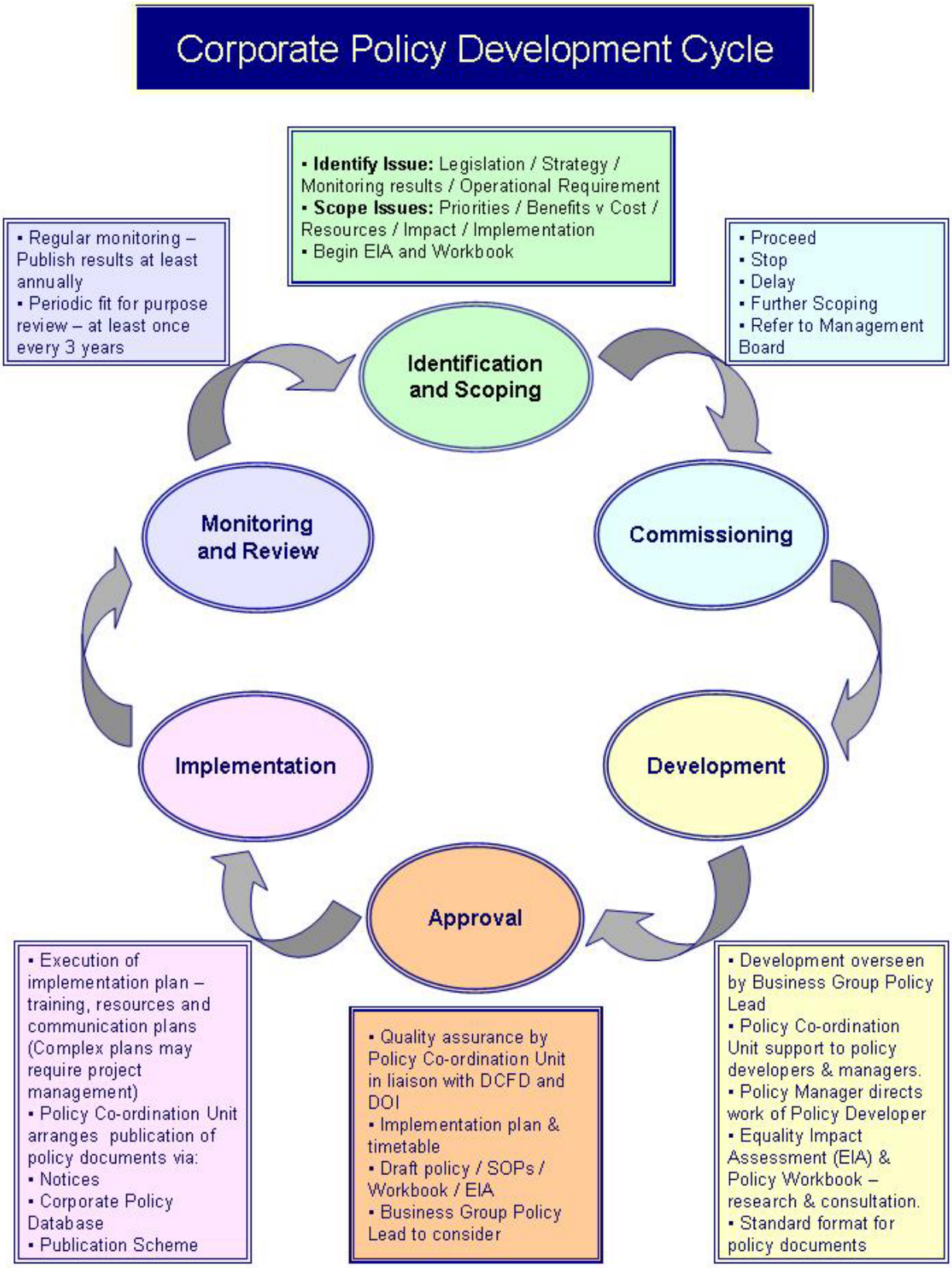
6. Monitoring and review

Monitoring of compliance, benefits and impact should be carried out continuously throughout the lifetime of a policy and/or SOP.

The results of this monitoring must be recorded in a Monitoring Report template on an annual basis, and submitted to the Business Group Policy Co-ordinator for quality assurance. Once satisfied, the Business Group Policy Co-ordinator will send the report to the Policy Co-ordination Unit to arrange for it to be published on the MPS Publication Scheme.

This monitoring data then feeds into future policy reviews.

The following diagram shows the 6 stages of the Corporate Policy Development Cycle, and details various activities taking place under each of these stages.



The requirement to assess the impact of policy underpins each stage of the development and review process. The EIA and Corporate Policy Workbook/Policy Checklist ensure policy developers consider all issues necessary for the successful impact assessment of policy and procedures. To demonstrate that all corporate policy has been appropriately impact assessed the completed EIAs for each policy will be published on the MPS Publication Scheme. Detailed guidance on each stage of the impact assessment process and how to complete the EIA is contained in the EIA SOP.

Further information may be obtained from the Diversity and Citizen Focus Directorate.

Responsibilities

This SOP is owned by the Director of Strategy and Improvement, Directorate of Resources.

This policy will be implemented by members of Management Board, designated Business Group Policy Leads and Heads of Units responsible for developing and reviewing corporate policy.

This policy will be monitored and reviewed by the Policy Co-ordination Unit.

Associated Documents and Policies

Management of Policy Development in the MPS Policy Statement

Policy development guidance and tools:

- Corporate Policy Guide
- Corporate Policy Workbook
- Corporate Policy Controls Measures Template
- Corporate Policy Statement Format
- SOPs Format
- Monitoring Report Format

Other relevant documents and information:

- Equality Impact Assessment Policy
- Equality Impact Assessment SOPs
- Equality Impact Assessment (form 6119a)
- MPS Equalities Scheme
- Item 4, Notice13-02, of 29 March 2002 – use of registered files to record policy.
- MPA/MPS Community Engagement Strategy