

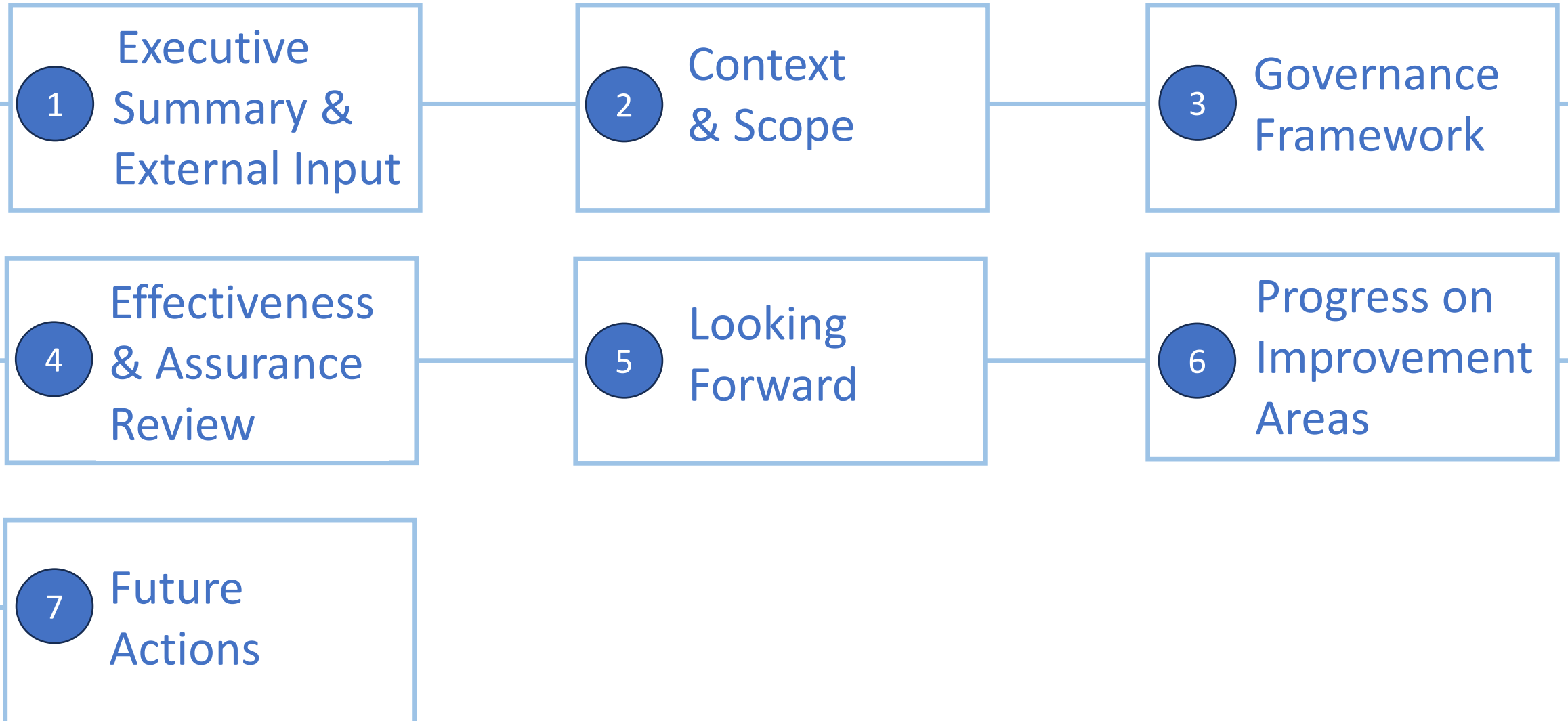


**Sussex
Police & Crime
Commissioner**

Police & Crime Commissioner for Sussex Annual Governance Statement 2024/25

19 May 2025, draft publication 30 June 2025

Prepared by the Assurance Team



Executive Summary and External Input



**Sussex
Police & Crime
Commissioner**

The Annual Governance Statement (AGS) is a mandatory annual statement as required in the Code of Corporate Governance for the Police & Crime Commissioner for Sussex and the Chief Constable. It describes how the business operates. The preparation of the AGS should add value to the governance and internal control framework. It further provides assurance on the areas of improvement identified to further enhance governance arrangements that the PCC plans to progress during 2025/26.

The Senior Management Team comprising the Police & Crime Commissioner (PCC) the Chief Executive & Monitoring Officer and the Chief Finance Officer recognise the importance of continual review and scrutiny of governance. They pledge their commitment in doing the right things, in the right way, in line with our priorities and values whilst addressing any identified areas for improvement highlighted in this statement.

This statement is designed to complement the AGS of the Chief Constable of Sussex, to give the full picture of governance of the PCC corporation sole. It is informed by an annual review of governance arrangements with assurance on compliance with the seven principles of the Code of Corporate Governance, by on-going audit inspection, and internal review.

This statement has been prepared on the basis of a review of effectiveness of governance arrangements. Advice and recommendations on the AGS have been received from internal and external auditors and the Joint Audit Committee to check and verify that it represents a fair and reasonable assessment of the current governance arrangements and plans for improvement.

The AGS concludes that the governance arrangements continue to be regarded as fit for purpose in accordance with the governance framework.

Katy Bourne OBE
Sussex Police & Crime Commissioner
Date Draft tbc and Final tbc

Mark Streater
Chief Executive & Monitoring Officer
Date Draft tbc and Final tbc

Iain McCulloch FCPFA
Chief Finance Officer
Date Draft tbc and Final tbc

Opinion of Internal Audit 2023/24 and Input from Independent Joint Audit Committee Chair



**Sussex
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The Annual Governance Statement process was reviewed by internal audit in 21/22 with a **reasonable assurance** grading awarded.

Annual Internal Audit Opinion 2024/25

I am satisfied that sufficient assurance and advisory work has been carried out to allow me to form a conclusion on the adequacy and effectiveness of the internal control environment. In my opinion the framework of governance, risk management and control are 'reasonable', and audit testing has demonstrated controls to be working in practice.

Penny Knowles
Deputy Head of Southern Internal Audit Partnership
Date 28 May 2025

The Joint Audit Committee (JAC) is a key component of the corporate governance arrangements for both corporation sole entities.

The JAC's purpose is to provide an independent and high-level focus on the adequacy of the governance, risk and control arrangements. It supports the PCC and CC and other statutory officers in gaining confidence as to the existence of effective governance by reviewing the comprehensiveness of assurances to meet the needs of Statutory Officers in respect of reliability and integrity.

The JAC provide independent advice and recommendations to the PCC and CC on the adequacy of arrangements in place for: The risk management framework, the internal control environment, financial reporting, annual governance processes, internal audit and external audit. In each of the above areas the JAC is enabled and required to have oversight, independent review and provide recommendations helping to ensure there are adequate arrangements in place for both internal challenge and public accountability.

Paul Burden
Independent Joint Audit Committee Chair
Date 15 April 2025

Context and Scope



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The Chief Constable and the Police and Crime Commissioner (PCC) are responsible for ensuring business is conducted in accordance with the law and proper standards, and that public money is safeguarded and is properly accounted for.

Regulation 6(1)(a) of the Accounts and Audit Regulations 2015 requires an authority to conduct a review at least once in a year of the effectiveness of its system of internal control and include a statement reporting on the review with any published Statement of Accounts (England). This term 'authority' includes the Chief Constable and the Police and Crime Commissioner legal entities. This requirement is reflected in the Code of Practice on Local Authority Accounting in the United Kingdom 2022/23 published by the Chartered Institute of Public Finance & Accountancy (CIPFA).

Under the Policing Protocol 2011 the PCC has responsibility for the delivery of efficient and effective policing, management of resources and expenditure by the police force. The PCC has a statutory responsibility to obtain the views of the community and victims of crime about the policing of the Sussex area and must take into account the views of responsible authorities. These views inform the PCC's Police and Crime Plan which sets the strategic direction and priorities for the Force.

The Chief Constable has a statutory responsibility for the control, direction and delivery of operational policing services provided by Sussex Police, having regard to the strategic direction and priorities set by the PCC in the Police and Crime Plan. In discharging this overall responsibility, the Chief Constable is responsible for establishing and maintaining appropriate risk management processes, governance arrangements and ensuring that there is a sound system of internal control, which facilitates the effective exercise of these functions.

The PCC continues to follow the principles of the CIPFA Framework: 'Delivering Good Governance in Local Government' and the guidance notes for policing bodies (revised 2016) also using the CIPFA Financial Management Code (CIPFA FM Code) to support good practice in financial management and to assist in demonstrating financial sustainability.

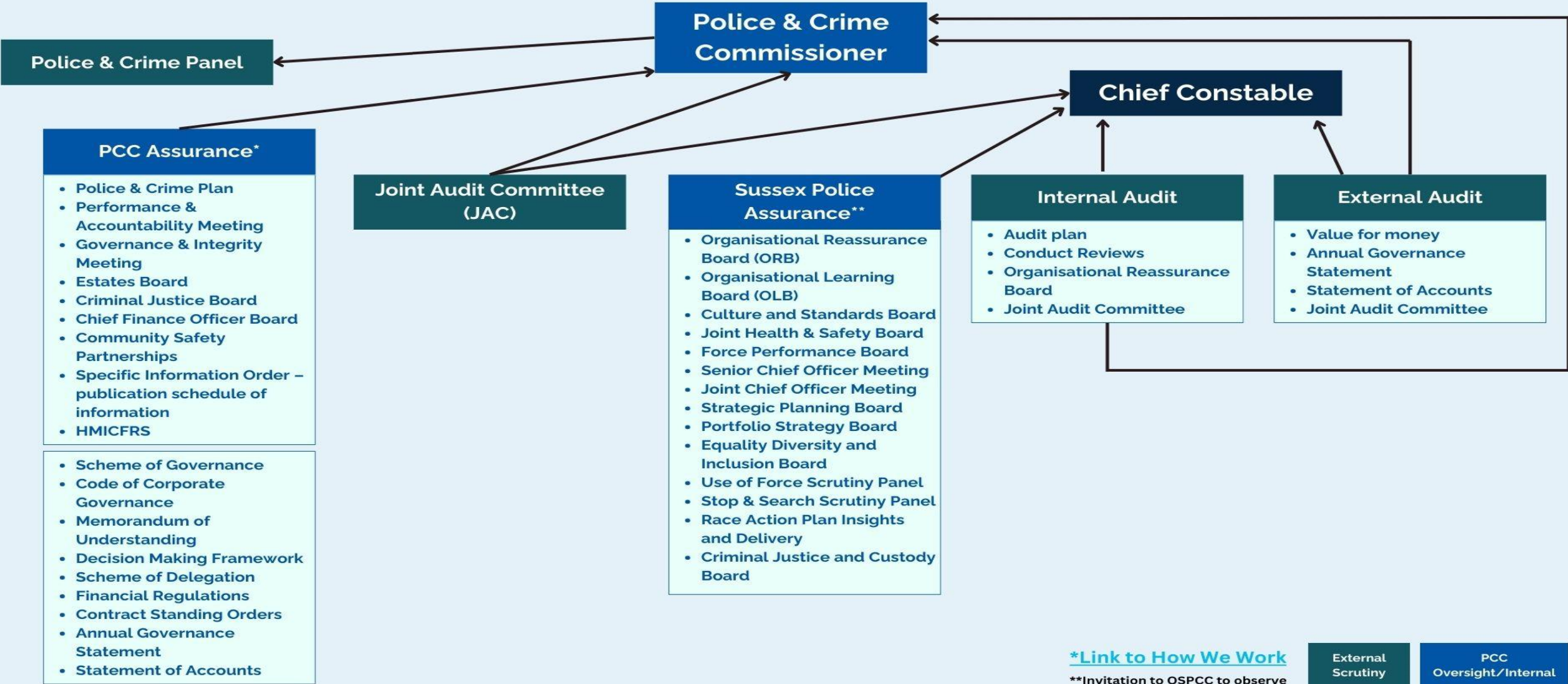
This statement explains how the PCC has complied with the principles and also meets the requirements of regulation 6 of the Accounts and Audit Regulations 2015 in relation to the publication of a statement on internal control.

The PCC's financial management arrangements conform to the governance requirements of CIPFA's Statement on 'The role of the Chief Finance Officers in Policing (March 2021)' .

Governance Framework



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[*Link to How We Work](#)

**Invitation to OSPCC to observe

External
Scrutiny

PCC
Oversight/Internal

Effectiveness and Assurance Review



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The Annual Governance Statement (AGS) incorporates the continuous review of the effectiveness of the PCC governance arrangements throughout 2024/25. It identifies those areas where we can and will do more to ensure that we have effective governance arrangements that enable the organisation to deliver on the Police and Crime Plan.

The AGS is an objective appraisal of the PCC governance framework to ensure that adequate arrangements continue to be regarded as fit for purpose and comply with the Code of Corporate Governance. It shows that the PCC have met their legal and statutory obligations. It also acknowledges that, due to the complex and dynamic environment in which it operates, the governance arrangements need to continually evolve to respond to changing circumstances.

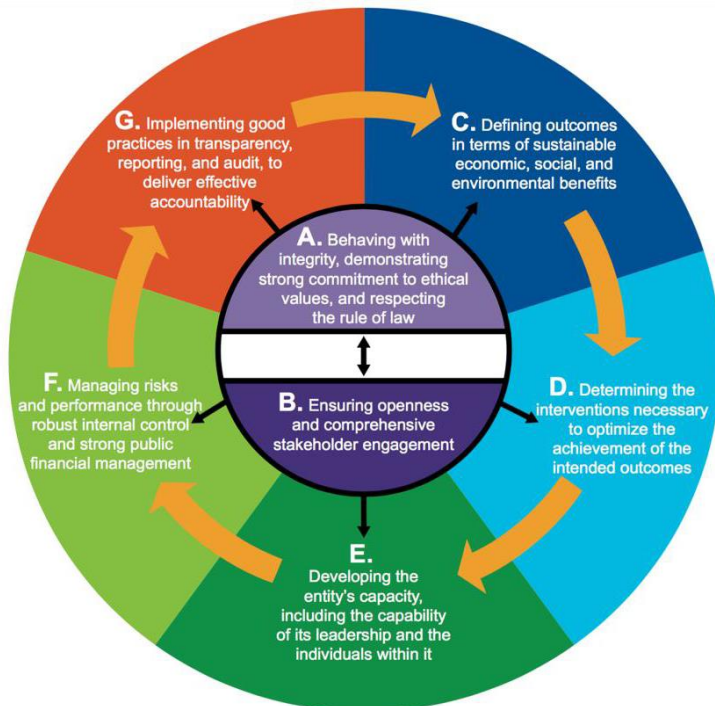
Governance arrangements for both the PCC and the Chief Constable follow the seven principles as set out in the revised Delivering Good Governance: Guidance Notes for Policing Bodies in England and Wales (2016 Edition).

Effectiveness and Assurance Review



Sussex
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Commissioner

The diagram below illustrates the various principles of good governance in the public sector and how they relate to each other. A summary of how the PCC complies with these principles is provided on subsequent pages of this document.



As part of the annual review, the PCC has considered each principle, providing an outline of the control measures in place, how the Principles are demonstrated and evidenced and indicated any areas for future focus.

Previous Actions

Previous actions and improvements highlighted from the 2021/22 and 2022/23 Annual Governance Statement were completed during 2023/24. A summary of previous actions status from 2023/24 Annual Governance Statement is provided, to outline the progress and future approach.

New Actions

Whilst the PCC aims to ensure that sound policies and processes are in place and working effectively, some areas of development or areas for improvement in governance have been identified. The PCC has identified these areas of continuous improvement and outlined the relevant actions on page 22 'Future actions from 2024/25 review'. New actions have been specifically linked to an individual principle however the PCC recognises that actions can influence multiple principles.

Existing Internal Business as Usual Actions

As part of this annual review, the PCC has also identified any ongoing areas where risks, issues and audit actions are being managed within our existing risk and recommendation governance framework which contribute to compliance with a principle. These are not featured in the in the 'Future actions from 2024/25 review' but are referenced in the individual principle section as ONGOING to provide context and transparency.



Devolution Priority Programme

The Devolution Priority Programme is an initiative by the UK government to fast-track local government devolution in areas that demonstrate a strong commitment and readiness to embrace greater local control. The programme focuses on establishing Mayoral Strategic Authorities, led by directly elected mayors, which will be granted significant powers over areas such as transport, infrastructure, skills, housing, economic development and public safety including fire and police.

Impact on Sussex

The establishment of a Mayoral Combined Authority for Sussex is expected to be approved and created in the Autumn of 2025 with elections for the mayor held in May 2026.

Running alongside this will be local government reorganisation and the establishment of three new Unitary Authorities (UA). The plans for what each UA will look like are under development by the existing district, borough, county and city councils. It is expected that 'vesting day' the day when all services, staff and assets will transfer to the new UA's will be 1 April 2028.

Potential Benefits for Sussex

- **Enhanced decision-making:** A Mayoral Strategic Authority would enable Sussex to make decisions that are more tailored to the specific needs and priorities of the region, rather than being dictated by central government.
- **Increased accountability:** A directly elected mayor would be accountable to the people of Sussex, ensuring that decisions are made in the best interests of the community.
- **Improved service delivery:** Devolution could lead to more integrated and efficient public services, as local authorities have a better understanding of the needs of their communities.
- **Economic growth:** Greater local control over areas such as transport, infrastructure, and skills could stimulate economic growth and create new opportunities for residents.



Challenges and Considerations

- **Change of Governance** – It is not clear at this time how the current role of Police & Crime Commissioner would be discharged under the Mayoral Office. There will be considerations if migrating functions and responsibilities to a mayoral function.
- **Stakeholder Engagement:** It is crucial to ensure that Sussex Police is fully engaged in the devolution process and that our voices are heard.
- **Collaboration:** Successful devolution requires strong collaboration between local authorities, fire, police businesses, and other stakeholders.
- **Financial sustainability:** The Mayoral Combined Authority must have the necessary financial resources to deliver on its objectives.

Conclusion

The Devolution Priority Programme presents a significant opportunity for Sussex to gain greater control over its own future. By embracing devolution, Sussex can unlock its full potential, improve the lives of its residents, and create a more prosperous future for the region. However, it is essential to address the challenges and considerations to ensure that devolution is a success and that public safety is maintained during a period of significant change to the governance of Sussex.

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
<p>Code of ethics</p> <p>PCC voluntary Code of Conduct</p> <p>Standards of Professional Behaviour</p> <p>Culture and Standards Board, Ethics Committee, Scrutiny Panels, Independent Advisory Groups</p> <p>Governance framework incorporates policies and procedures addressing procurement processes, anti-fraud, bribery and corruption supported by publication of expenses, gifts and hospitality</p>	<p>A revised Code of Ethics was published in 2024 and set out guidelines for ethical policing principles to assist police personal to do the right things, in the right way, for the right reasons. Practical guidance on maintaining public trust and legitimacy. Includes being open, honest and candid, treating all people and their property with fairness, dignity and respect and challenging or reporting behaviour that is unprofessional. Decision making process encourages the use of personal responsibility and professional judgment. Central to the National Decision Model (NDM), by using the Code of Ethics officers and staff can ensure they are acting in a fair and ethical way in everything they do.</p> <p>The PCC upholds office in line with the intentions of the Specified Information Order 2011 and abides by the Nolan Principles. The PCC ensures that officers and staff carry out their respective roles in a climate of openness, support and respect.</p> <p>Processes are in place to monitor standards of conduct and personal behaviour which are defined and communicated through appropriate codes of conduct and protocols. Standards of integrity, conduct and personal behaviour communicated, accessible and embedded in recruitment, induction, refresher training and focus reviews. (Core Values Framework).</p> <p>Sussex Police have specific force level strategic board charged with Culture and Standards which is supported by an independently chaired Ethics Committee, External Scrutiny Panels for Use of Force and Stop Search, alongside engagement with Independent Advisory Groups which a representative from the PCC's office attends. All of these meetings focus on relevant Authorised Professional Practice, force policy and exploration of continuous improvement. Run an effective Independent Custody Visiting Scheme to monitor the rights and treatment of detainees.</p> <p>The PCC and Chief Constable's policies are reviewed frequently, published and communicated across the organisations and in the public domain via the website. These include but not limited to; Appropriate relationships and conflicts, Gifts and Gratuities, Lawful Business Monitoring, Notifiable Associations, Substance Misuse and Testing and Anti Fraud, Bribery and Corruption. All of these policies have clear responsibilities for employees to follow.</p>	<p>The revised edition of the Code of Ethics was circulated to staff and it is embedded in new starters inductions. Mandatory training involving Code of Ethics consists of a 7 modules training package alongside an in-person module 4. Completion and attendance tracking is in place and reported to FaHRM.</p> <p>The PCC swears an oath in line with the code of conduct every term.</p> <p>Core Values Framework structure utilized in all entry routes and promotion processes. Annual personal development review undertaken. Regular Governance and Integrity Meetings are held with PSD.</p> <p>Regular attendance of the OSPCC to these meeting. Inclusion of a race action plan question into all our promotion processes. The OSPCC has platinum status for the ICV Scheme.</p> <p>An annual review of policies is presented to the Joint Audit Committee for external scrutiny. A schedule of when policies are due for review is set out within the Code of Corporate Governance. The OSPCC has refreshed its website signposting to enable better navigation and searching of documents</p>	<p>.</p> <p>.</p> <p>.</p>

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
Whistleblowing arrangements and Professional Standards Monitoring	Professional Standards Department (PSD) operate the Break the Silence confidential reporting service and the Joint Force Vetting Unit (JFVU) continues to act as a 'critical gatekeeper' for workforce integrity. The Break the Silence system is accessible, appropriate and a long-established confidential reporting arrangement and processes in place and that these are regularly reviewed by the Joint Audit Committee;	Anti corruption reporting into the Joint Audit Committee for external scrutiny. Dip checks on unsuccessful vetting applications. HMICFRS inspection report into the effectiveness of the integrity arrangements in Sussex Police has been published.	
Complaints Process	The PCC has a statutory responsibility for complaints made about the Chief Constable's personal conduct. Clear advice on the complaints process is accessible with escalation signposting on the OSPCC website alongside reviews of police complaints and complaints made against the PCC and staff set out by the Police & Crime Act 2017.	Dip check of all complaints that are reported to Sussex Police to ensure complaints are effectively managed. Complaint and review data is published on the PCC's website. Quarterly Governance and Integrity meetings held between OSPCC, Professional Standards Department and People Services.	
Equality, Diversity and Inclusion strategy	The PCC is committed to creating an inclusive workforce and fostering a culture of inclusion which also recognises the individual needs of the people we serve by engaging effectively we communities. OSPCC staff undertake mandatory training set by the College of Policing. Further to this, staff participated in a tailor-made EDI training session, run by Weightmans on 17 April 2025 was well attended. A representative from the PCC's office also attends Sussex Police's EDI board, Culture & Standards Board, Use of Force and Stop & Search Scrutiny Panels.	The OSPCC attends Sussex Police's EDI meetings, and scrutiny panels. A representative from the PCC's office attends the Race Action Plan meetings. Compliance for completion of mandatory training packages set by the College of Policing. Good attendance at the EDI Weightmans session.	
Race Action Plan	In 2022 Sussex Police created the Race Action Plan Insights and Delivery Board (RAPID) to ensure that the national Police Race Action Plan, as agreed by all 43 Chief Constables under the NPCC, was fully implemented, a member of the PCC's office sits in on the meetings.	A representative attends the RAPID board and the Culture & Standards Board.	
HMICFRS national recommendation work	The PCC monitors all relevant national and force inspection reports with their associated recommendations including but not limited; Abuse of Position for Sexual Purposes, Violence Against Women and Girls, Police Perpetrated Domestic Abuse and Vetting Misconduct and Misogyny.	This is achieved through the HMICFRS PCC Response Portal.	

Ensuring openness and comprehensive stakeholder engagement

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
<p>The PCC's Annual Report</p> <p>Up-to-date freedom of Information Act 2000 publication scheme</p> <p>Commissioning and Victim Services Team and Partnerships Team</p> <p>Precept Consultation</p>	<p>The PCC is required to publish an Annual Report each year. The Annual Report provides an update on the progress made against the policing and crime objectives set out within the Police & Crime Plan. The Annual Report for the period 1 April 2024 – 31 March 2025 will be presented to the Sussex Police & Crime Panel at their meeting on 3 July 2025 for their review and feedback.</p> <p>In line with General Data Protection Regulation (GDPR), the OSPCC has a Data Protection Officer who is responsible for ensuring that the publication scheme, privacy notice, disposal and retention schedule, information sharing agreement and memorandum of understanding are all up to date and accurate to ensure compliance with the law.</p> <p>The PCC continues to participate and engage with partners at national, regional and local level, together with supporting and contributing to community safety partnerships across the county. The PCC engages with the public in an open and comprehensive manner, consulting regularly. Weekly information about policing activities and decisions are published in our newsletter, and Performance and Accountability Meetings with the Chief Constable are webcast. There are annual engagement sessions for the High Sheriffs of Sussex. Telephone surgeries take place with members of the public. National Surveys and polls are conducted in association with the Association of Police and Crime Commissioners (APCC). The PCC supports and contributes to Community Safety Partnerships in Sussex with both higher and lower tier authorities. The Police Reform and Social Responsibility Act place a mutual duty on PCCs and local authorities to co-operate to reduce crime, disorder and re-offending, and the PCC plays an active role in ensuring other partners contribute appropriately and support the effective discharge of the duty. The PCC is legally responsible for the Serious Violence Duty and has secured Home Office funding to meet this duty via the Sussex Violence Reduction Partnership, which is effectively reducing youth violence. She has also funded the extension of the Immediate Justice (IJ) programme in Sussex to solidify the gains made in 24/25, and in anticipation of a transition to a new Government programme incorporating the aims and objectives of IJ.</p> <p>The PCC began a rolling programme of consultation from the start of the 2023/24 financial year to broaden engagement across the county and across different demographic groups. This included a combination of focus groups (some face to face and some online), surveys at public events, the normal PCC engagement programme and a paid-for online poll. During summer 2023 the PCC's office attended twenty-two Talk Sussex events across the county. At these events there was face-to-face engagement with a total of 800 residents, where the OSPCC team asked them about feelings of safety within their local area. In April 2023, Sussex was chosen as 1 of 10 pilot areas underneath the Government's Anti-social Behaviour Action Plan and there was a requirement to consult with the public on this. A short survey was conducted gaining over 800 responses on how residents of Sussex would like offenders of ASB to make amends. The PCC commissioned an external poll asking residents how safe they felt in Sussex and whether they would be prepared to pay an increase in their local precept. The survey was developed by Habit5 and distributed via citizen access panels and through social media.</p>	<p>The Annual report is presented to the Police & Crime Panel for oversight and comment.</p> <p>Data Protection Officer monitors and reviews the relevant policies. Freedom of Information requests are dealt with within the specified 28 days. The OSPCC received a substantial assurance from an internal audit review.</p> <p>A dedicated partnership team is in place to actively engage with and support statutory partners. The PCC has regular liaison meetings with Council Leaders and Chief Executives from the top tier authorities and regular briefings with local MPs. The PCC manages the Sussex Restorative Justice Partnership in connection with the Sussex Criminal Board. Annual media and social media targets and quarterly media evaluation and analysis. Monitoring of social media channels. Good governance with partner agencies such as Youth Executive Boards, Criminal Justice partnerships etc. The Commissioning & Victim Services team also lead on a Victim Engagement Forum.</p> <p>The precept decision is scrutinised by the Police and Crime Panel at their meeting in January.</p>	

Ensuring openness and comprehensive stakeholder engagement

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<p>Stakeholder engagement following the announcement of the Mayoral Combined Authority with victim providers and partnerships</p>	<p>The partnerships team have engaged with the district and borough council Community Safety Partnerships (CSP) leads and held a briefing session to discuss the potential impact of the changes, in particular the Local Government Reorganisation (LGR) process which is taking place alongside the Mayoral Combined Authority (MCA) devolution process. This briefing session set out the knowns and unknowns in the process so far, and also enabled the CSP leads to share their concerns and understand the potential impact on them and the partnerships. Ad hoc stakeholder engagement is also taking place with other key stakeholders in both upper and lower tier authorities, with sharing of information and open dialogue taking place to ensure that those impacted are being kept up to date with the current position as we know it.</p> <p>The PCCs office have also set up an internal working group to assess, understand and accommodate the changes that both the MCA and LGR will bring. This will assist the PCCs office, and our stakeholders, understand the implications of the changes and how we will ensure services continue and the required support is provided to the new organisations.</p>	<p>Assurance is sought and demonstrated by the PCCs office running an internal working group to understand and take account of the changes.</p>	<p>NEW ACTION: Whilst there is ongoing uncertainty and a number of key decisions still to be made concerning both the MCA and LGR, there is obviously an ongoing challenge. The PCCs office will ensure that information is communicated to stakeholders when it is available and that an ongoing, open dialogue is maintained.</p>

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

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
Refresh and Publish the Police & Crime Plan	The PCC scrutiny role to determine that the Sussex Police & Crime Plan priorities are supported well by her staff and the Chief Constable.	The PCC holds the Chief Constable to account at eleven Performance and Accountability Meetings throughout the year. The PCC holds regular meetings with the public and representative groups to determine public priority and need.	
Produce an Annual Report	The PCC is required to publish an Annual Report each year. The Annual Report provides an update on the progress made against the policing and crime objectives set out within the Police & Crime Plan. The Annual Report for the period 1 April 2024 – 31 March 2025 will be presented to the Sussex Police & Crime Panel at their meeting on 3 July 2025.	The annual report is published on the PCC and Chief Constable's website. The plan is presented to the Police & Crime Panel for their comment prior to publication.	
Review of the Medium-Term Financial Strategy	The Medium-Term Financial Strategy is supported by robust, sustainable multi-year budgets to deliver the vision set out in the Police and Crime Plan and supports spending plans and precept decisions. The PCC follows a decision making-framework, with a record of decisions made and supporting material with 'gate-way' sign off points. The PCC ensures that revenue and capital spending plans are appropriate and affordable.	The Medium-Term Financial Strategy is scrutinised by the PCC. Key decisions are available to the Police & Crime Panel for scrutiny and review and are published on the PCC's website. The PCC through scrutiny of the revenue and capital budgets ensures that the revenue and capital spending plans are sustainable.	
PCC holds the Chief Constable to account	The PCC holds the Chief Constable to account for the performance of Sussex Police at monthly webcast Performance & Accountability Meetings (PAMs).	The meetings are webcast live on the PCC website, and the minutes are published online.	
The PCC actively pursues joint working opportunities at a local, regional and nation level.	Collaborated arrangements with Surrey police and Surrey PCC for the delivery of specific services, as well as town boards, Regional Organised Crime Unit (ROCU), Bluelight Commercial, national Section 22 Collaborative arrangements for example, National Air Service.	Through partnership agreements and arrangements.	

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

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
<p>Funding for Services</p>	<p>The PCC has had and continues to be successful with Home Office applications to secure funding for services. As an illustration, hot spot policing funding from the Home Office has been secured to support Sussex Police's response to reduce knife crime and serious violence. She has also secured Home Office funding and support for the Violence Reduction Partnership, which has contributed community initiatives to reducing violent crime, especially by young people. The VRP will also be piloting the Government's Prevention Partnerships in Sussex, for which again funding has been secured. The PCC has also extended the provision of youth Immediate Justice for 12 months in Sussex by the judicious use of reserves, meaning that a demonstrably successful initiative that the new Government stopped supporting has been maintained. The PCC is also looking at how a good level of receipts from the Proceeds of Crime Act can be used to support PCC-led initiatives which will further reduce crime and support communities.</p> <p>Within the PCC office there is a team dedicated to the commissioning of victim services and partnerships. The PCC is awarded an annual Core Victims Grant from the Ministry of Justice, which in turn funds a range of support services for victims across Sussex. A Funding Network funding tranche is also offered annually where applicants are assessed against an agreed set of criteria by a panel. The criteria can be dictated by strategic assessments that indicate where gaps in services for victims are identified i.e. Pan-Sussex Domestic Abuse Needs Assessment. Those scoring the highest and who have been quality assured may be awarded grant funds for projects in Sussex.</p> <p>A common outcome-measurement framework has been developed for all victim support services in Sussex – this crosses over statutory and non-statutory agencies. The findings from these outcome measures ensure services are having a positive impact on users and therefore representing economic value also.</p> <p>The Bluelight Commercial Co, a PCC owned company, are working closely with partners to develop a qualitative approach to the evaluation of social value and sustainability aspects of bid submissions. All of this should also encourage more diverse supply chains, including SMEs and VCSEs, and help their capability to deliver against such a qualitative approach. We will update the AGS as this work develops and any changes are embedded within Contract Standing orders. A revised Contract Standing Orders will be brought to the PCC for approval in the autumn 2024 once the new procurement legislation has been translated into actions.</p>	<p>Governance and monitoring arrangements are in place with Multi-agency Violence Reduction Partnership Steering Group and Executive Board. The Partnership Team actively engage with statutory partners and attend meetings such as Community Safety Partnerships, Prevent Boards, Sussex Modern Slavery Network etc. The commissioned services are subject quarterly monitoring and grant supported service undergo quarterly outcome measurement checks.</p> <p>The Victim Services Team conduct quarterly monitoring meetings with service providers to ensure standards of delivery, to resolve any challenges with statutory partners i.e. Sussex Police, and in turn provide performance and financial data returns to the Ministry of Justice.</p>	

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

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
Annual review of the corporate governance framework	They are reviewed each year.	The framework and Scheme of Governance is reviewed by Chief Officers and presented to the JAC prior to approval by the PCC.	
Risk Management Strategy and Policy in place	Review of the strategy and policy on a regular basis to ensure threats to the achievement of the PCC's organisational objectives and regional and national responsibilities are identified and managed effectively (reviewed December 2023).	The risk management policy is presented to the JAC and is reviewed at Finance and Human Resources Meeting (FaHRM).	
Stakeholder Engagement	Carried out regular stakeholder engagement events and needs assessments for commissioned services to establish priority areas of demand for support services. Engaged in the HMICFRS Police inspections debriefs, board and relevant gold group meetings. Worked with key partners to achieve the priorities as set out in the Police & Crime Plan. Been represented on Pan-Sussex multi-agency management boards, delivering a joint strategy to support victims of sexual violence, domestic violence and vulnerable or exploited children. There is an annual precept survey completed to support the PCC precept decision.	The Commissioning Strategy was reviewed and amended in 2023. The strategy sets out how the PCC commissions victim support services and will be reviewed in light of the new PCC Police & Crime Plan. The Annual Report for the period 1 April 2023 – 31 March 2024 was presented to the Sussex Police & Crime Panel on 28 June 2024 and a fully-accessible version of the report can be viewed here . There is an annual precept survey completed to support the PCC precept decision.	
Ensuring processes are in place to allocate the required funding.	Met the statutory responsibility of commissioning services to support victims of crime through an effective tender process. Managed a competed fund scheme to provide funding to specialist victim support services. Enhanced monitoring is now taking place of the outcomes achieved by the funded awarded by the PCC to the Community Safety Partnerships in Sussex. The Commissioning & Victim Services team conduct regular monitoring meetings with commissioned service providers. This includes the review of monitoring data that highlights service user feedback. The team also review and monitor the financial spend against the grant or contract. For grants received from central government, all reporting deadlines are adhered to including financial statements and qualitative evidence of delivery. Commissioned services adhere to Contract Standing Order and Financial Regulations. Internal processes and strong governance systems in place.	Budget monitoring timetable is in place and regular monitoring of the revenue and capital budget takes place. The PCC has a communication and engagement strategy.	

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

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
Performance reviews with staff	<p>Personal development programme is in place for all OSPCC staff to make sure they have the knowledge and skills to undertake their roles through regular one-to-one meetings and individual development review meetings. The OSPCC team received regular themed meetings; recent topics have included Video Enabled Justice, Independent Custody Visiting Scheme, Abuse of Authority and the Anti-Corruption Unit, Violence Reduction Unit (VRU) and Knife Crime, Cybercrime, precept and the Medium-Term Financial Strategy. OSPCC staff receive updates from the Association of Police & Crime Commissioner on key issues.</p>	<p>In 2025, the OSPCC moved to a new system to record annual performance development reviews. Line managers now conduct 'focus conversations' with their staff more frequently.</p>	
Scrutiny of collaboration work	<p>Continued to ensure that regional and research activity takes place with examples of collaboration with Surrey and Kent forces and PCC offices on emerging issues. Continued to support a programme of collaboration between Sussex and Surrey Police to increase capacity, share expertise and provide the most efficient and cost-effective service</p>	<p>A representative from the PCC attend's joint boards and meetings. Regional meetings are regularly held between other PCC's office.</p>	
NCALT mandatory online training courses	<p>All OSPCC staff complete NCALT mandatory training courses.</p>	<p>The Assurance Team monitor NCALT compliance on a monthly basis and a report is produced for FaHRM.</p>	
Partnership activity is managed on a national, regional and local level	<p>The PCC is the chair of the Sussex Criminal Justice Board (SCJB) and relevant staff provide support and attend all three of the sub-groups. The OSPCC also employs a part-time SCJB Coordinator to support the administration of the board on behalf of all member organisations. Funding disseminated from the Commissioner to CSPs is monitored through quarterly returns from individual CSPs to ensure outcomes are produced. Performance monitoring of the CSPs has been enhanced this year, with them required to submit evidence-based case studies which support the interventions and demonstrate the value for money of the investment into the CSPs.</p>	<p>The PCC has responsibilities to manage the financial grants, to convene those specified and relevant authorities and to monitor their compliance of the new serious violence duties.</p>	
Local partnership arrangements are in place with statutory partners e.g. the numerous Community Safety Partnerships (CSPs) and upper tier local authorities.	<p>The Sussex PCC continues to be successful in Home Office applications to secure GRIP (previously referred to as Surge funding and now Operation Safety). This is the Sussex Police dedicated response to reduce instances of knife crime and serious violence in the county. The Commissioner during this period has realigned teams and responsibilities to focus on Business Crime and the increased threats emerging, including the development of the Safer Sussex Business Partnership. Additionally, a greater emphasis has been on anti-social behaviour and community trigger and as a result PCC staff are engaged with the Sussex Police ASB working groups to monitor progress. The CSPs are being encouraged to work with the partnerships team to develop effective performance measures to ensure that they are effectively held to account.</p>	<p>OSPCC staff are engaged with the Sussex Police ASB working groups to monitor progress.</p>	

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

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
<p>Devolution Working Group</p>	<p>Following the Government's English White Paper, Sussex has been identified to be part of the Devolution Priority programme. As part of this programme, the PCC will fall within the Mayoral Strategic Authority. A working group has been set up to ensure that statutory capabilities within the OSPCC are not disrupted and the transition to a Mayoral system is fluid. The working group is chaired meets bi-monthly and is well represented by staff from the OSPCC, a senior officer and representatives from People Services within Sussex Police, Weightmans legal team, Sussex Police & Crime Panel, and the Chief Executive Officer of Sussex and Surrey Associations of Local Councils.</p> <p>The PCC's Chief Executive Officer update OSPCC staff regular at weekly team meetings.</p>	<p>A well represented working group has been established.</p> <p>The Chief Executive Officer provides regular updates to the wider OSPCC team on devolution developments.</p>	<p>A terms of reference for the working group is in draft format.</p> <p>When further information is made available by Government, the resourcing around the transition arrangements is expected to become more of a challenge alongside the delivery of day-to-day business.</p>

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

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
Data Protection and information policies	<p>The data controller within the PCC's office is the Head of Performance who ensures the correct policies are in place and reflect the changes to the General Data Protection Regulations 2018. Data protection and information management policies and strategy are in place with Sussex Police, commission services and partnerships. A process for Information Sharing Agreements is reviewed and updated regularly. Information on Freedom of Information, publication schemes, records management and disposal, and complaints can be found on the PCC's website in accordance with the Elected Local Policing Bodies (Specified Information) Order 2011. In accordance with the Freedom of Information Act, the OSPCC has a publication scheme and processes all FOI requests in accordance with the legislation.</p>	<p>Review of information security and information sharing has been undertaken between OSPCC and Force to ensure that systems in place are robust. An internal audit opinion of substantial was given with no risks identified for OSPCC Information governance and Management including GDPR and Data Protection Act 2022/23.</p>	
Risk Management Policy and Strategy	<p>The OSPCC Risk Management Strategy is reviewed bi-annually to ensure continuing compliance with any legislative changes and best practice principles identified. The most recent review took place in June 2024 and was reported to the Joint Audit Committee in the same month.</p>	<p>The PCC reviews the risk register every month at its FaHRM meeting. Any significant risks are transferred to the strategic risk register which is reviewed by the JAC at their quarterly meetings. The PCC is also represented at meetings of the Organisational Reassurance Board where the Force risk register is managed.</p>	
Decision Making is in accordance with the Scheme of Corporate Governance	<p>The Decision-Making Framework details the arrangements to enable the PCC to make robust, well informed and transparent decisions.</p>	<p>Key decisions are discussed and agreed at weekly Senior Management Team meetings Key decisions are published Police and Crime Panel scrutiny of decisions</p>	
Joint Audit Committee (JAC)	<p>The JAC are made up of four independent members. Meetings are held quarterly and the open to the public for part one of the meeting. The meetings are well represented by Chief Officers from Sussex Police and OSPCC; minutes and papers are published online.</p>	<p>An annual assessment of the JAC is completed by the JAC Chair including input by all members. The Chair completes an annual report which is published and sent to the PCC and CC. All members have an annual personal performance review.</p>	

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

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
Police & Crime Panel	<p>The Sussex Police & Crime Panel scrutinise key strategic decisions and documents (including the Sussex Police & Crime Plan and the proposed precept decision). The PCC cooperates fully with any requests received from the Panel for working groups to consult them on budgets and precepts, annual report, PCC priorities and the commissioning of victim services. The reports provided to the Sussex Police & Crime Panel during 2024/25 can be viewed here.</p>	<p>The Sussex Police & Crime Panel is webcast live and minutes are made available online. The panel is held quarterly.</p>	
HMICFRS Reports	<p>The PCC has a statutory responsibility to comment on reports and assessments published by HMICFRS. The assessments and the PCC's responses to each of these can be viewed here. Further to this, Sussex Police also conduct their own internal inspections around different areas of performance. HMICFRS undertook their initial inspection of the Police Effectiveness, Efficiency and Legitimacy (PEEL) assessment of Sussex Police in 2024/25 in February 2025. The inspection report is due to be published in spring 2026.</p>	<p>The Head of Performance regularly monitors the recommendations via an online portal alongside the Force Risk Manager. All PCC formal responses to HMICFRS inspections are published on the Sussex-PCC website.</p>	
Review of whole group finances, financial risk and issues, scrutiny of Chief Constables financial business cases and procurement	<p>The CFO attends the Deputy Chief Constables Strategic Planning Board which includes standing agenda items for the monitoring of the revenue and capital budget, establishment and demand and other significant financial decisions. The CFO also attends other Boards on a regular basis to monitor performance including the Joint Transport Board, Custody Board, CFO Board and the Financial Planning and Performance Board. The Scheme of Governance, including contract standing orders and financial regulations are reviewed annually. Links to key finance documents can be found in the Appendix.</p>	<p>Through Chief Finance Officer Board, scrutiny of resource transfers through scheme of consent and key financial information including financial regulations. Financial risks reviewed monthly and a quarterly review of the whole group finances undertaken. Publication of Medium-term Financial Strategy, budget, precept decision, treasury-management strategy (debt and cash management) and PCC reserves strategy. Publication of PCC key decisions on financial decisions and monitoring.</p>	
Business Continuity	<p>Business continuity arrangements are in place to meet the requirements outlined in the Civil Contingencies Act 2004. The OSPCC Business Continuity Plan is reviewed every year. It was last reviewed and tested on 9 October 2025 and is available to all staff in the Shared Drive under Business Continuity . In addition to the contact tree set out within the Plan, an OSPCC Business Continuity 'WhatsApp' group has been established to convey urgent messages that relate to business continuity to all of the team in an efficient and consistent manner. Meetings between the Business Continuity lead and the Chief Executive Monitoring Officer ahead of the testing exercise.</p>	<p>Business continuity plans, activation lists and the testing of plans are monitored at ORB. Testing was conducted on 9 October 2024. Tracked at ORB.</p>	
Commissioned Services	<p>All commissioned services are subject to regular monitoring which is aligned to their individual deliverables, including the identification of risks & issues. Monitoring data is collected from all service providers and reviewed on a quarterly basis, prior to being shared with the Ministry of Justice.</p>	<p>All commissioned services have a clear escalation process to notify the OSPCC should there be an issue outside the normal monitoring framework, this includes any risks to service deliver or in year financial spend</p>	

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

CONTROLS WHAT IS IN PLACE	STRENGTHS WHAT IS WORKING WELL	HOW ASSURANCE IS SOUGHT AND DEMONSTRATED	CHALLENGES WHAT CAN BE IMPROVED
Internal and External Inspections	<p>The internal audit function is carried out by Southern Internal Audit Partnership for both PCC and Sussex Police. The CIPFA code requires internal audit to provide an opinion on the overall adequacy and effectiveness of the governance framework. The OSPCC and Sussex Police’s annual internal audit opinion 2023/24 was ‘substantial’ overall and audit testing had demonstrated controls to be working in practice. The External Auditor produces an annual report, however due to the delays in audit due to a lack of auditor resources, an external audit opinion for 2022/23 has not been issued.</p>	<p>Internal and external audit are scrutinised by JAC, both report into the JAC. Internal and External audit reports are published online for public scrutiny. A substantial Internal audit opinion was given with no risks identified. This is an improvement from 2022/23 audit where ‘reasonable’ assurance was given. The JAC Chair meets quarterly with the Deputy Head of Internal Audit alongside an annual meeting with all Committee members and the Partner from External Audit. Audit delays are reported at JAC .</p>	
HMICFRS	<p>The PCC has a statutory responsibility to comment on reports and assessments published by HMICFRS. The assessments and the PCC’s responses to each of these can be viewed here.</p>	<p>Comments are tracked on an online portal that is monitored by the Head of Performance and the Force Risk Manager. Recommendations are tracked through the ORB and other board meetings, including JAC.</p>	
Decision Making	<p>The PCC Senior Management Team meets weekly with the PCC to review activity and decisions. Senior officers also meet once a month to consider finance, governance and human resource matters. A standard decision report template is used for consistency.</p>	<p>The review of evidence for the effectiveness of the governance framework, confirms that current arrangements are fit for purpose, considered by senior officers at FaHRM and processes presented to JAC.</p>	
The Annual Reports/Police & Crime Panel Reports/Statement of Accounts/AGS	<p>The PCC is required to publish an Annual Report each year. The Annual Report provides an update on the progress made against the policing and crime objectives set out within the Police & Crime Plan. The Annual Report for the period 1 April 2024 – 31 March 2025 will be presented to the Sussex Police & Crime Panel at their meeting on 3 July 2025. Report information, including Statement of Accounts, and AGS are published on the PCC’s website in accordance with the Elected Local Policing Bodies (Specified Information) Order 2011.</p>	<p>Reports published on the PCC’s website, presented to the JAC and made available to the Police & Crime Panel.</p>	
Payments over £500, gifts and Hospitality and Business Interests	<p>The expenses for PCC, CEO and CFO are available online.</p>	<p>The JAC provide annual scrutiny and oversight for governance and financial arrangements, payments over £500, gifts & hospitality register. Published for public scrutiny on PCC website: How We Work.</p>	

Progress on Improvement Areas from 23/24 Review

Action Number & Reference	Issue identified and objective	Owner	Status & Target Date	Principle Linkage	Commentary
1	<p>Equality, Diversity & Inclusion Development</p> <p>Risk identified: The PCC's office is a separate organisation to Sussex Police, and whilst the OPSCC is engaged with the training utilised by Sussex Police, it has been identified that internal development alongside NCALT packages would be beneficial.</p> <p>Action: To organize a training session with Mark Landen from Weightmans to deliver an independent package to the OSPCC.</p> <p>Progress: The Assurance and Complaints Manager to orgainse with Mark Landen an EDI training package.</p>	Chief Executive & Monitoring Officer	Completed	<p>Principle: A</p> <p>Monitored via: EDI Board, FaHRM, Culture and Standards Board</p>	<p>The PCC is committed to creating an inclusive workforce and fostering a culture of inclusion which also recognises the individual needs of the people we serve by engaging effectively we communities. A representative from the OSPCC attends Sussex Police's EDI board, the Culture and Standards Board and external scrutiny groups for Use of Force and Stop and Search.</p> <p>Members of the OSPCC complete relevant mandatory NCALT packages set by the College of Policing, alongside this, an internal, bespoke EDI training course was delivered by Weightmans on 17 April 2025.</p>
2	<p>Review Application Efficiency</p> <p>Risk identified: The current downloadable application form is a slower process and time consuming at the logging stage.</p> <p>Action: To have an online review application form that can be completed and sent directly to the Business Support/Assurance Team for logging. Automatic response generated.</p> <p>Progress: Online webform is live and is being utilised successfully.</p>	Assurance & Complaints Manager/ Digital & Marketing Manager	Completed	<p>Principle: F</p> <p>Monitored via: Meetings with Assurance Team/ Digital & Marketing Manager</p>	<p>To streamline the review process, an online review application form has been developed for applications to be submitted online. The review form is live on the website, and several tests have been conducted to test its efficiency. Reviews are being received via the online form</p> <p>Reviews are being received via the online form. A process has been developed to log and streamline the review process.</p>

Future actions from 24/25 review

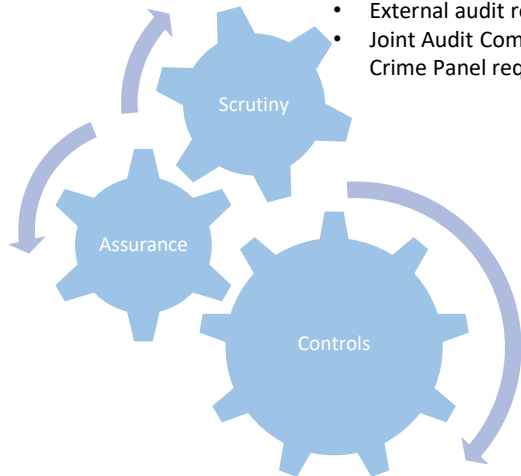
Action Number & Reference	Issue identified and objective	Owner	Status & Target Date	Principle Linkage	Commentary
1	<p>Open Stakeholder Engagement following Mayoral Combined Authority</p> <p>Risk identified: Lack of communication with stakeholders regarding changes to funding and positions. With the proposed implementation of a new mayoral system, stakeholders may become concerned or anxious about their future if they are not regularly informed about changes to funding process and functions. This could lead to decreased engagement and reduced trust and confidence during the transition process.</p> <p>Action: To hold regular updates and briefings with stakeholders.</p> <p>Progress: Community Safety Partnership briefing held in April.</p>	Head of Partnerships /Head of Victim Services	In progress	Principle: B Monitored via: Regular Meetings with stakeholders as and when updates become available.	<p>The Head of Partnerships provided a briefing for Community Safety Partnership leads in April. The Chief Finance Officer will be delivering a presentation to victim providers in May.</p> <p>Whilst there is ongoing uncertainty and a number of key decisions still to be made concerning both the MCA and LGR, there is obviously an ongoing challenge. The PCCs office will ensure that information is communicated to stakeholders when it is available and that an ongoing, open dialogue is maintained.</p>
2	<p>To ensure the PCC's statutory responsibilities and services are maintained throughout the devolution period and that a fluid transition to the Mayoral system is underway</p> <p>Risk identified: PCC's statutory responsibilities and services are disrupted and that the transition to the Mayoral system will not be smooth. Staff in OSPCC may become anxious about their future if they are not regularly informed about devolution changes.</p> <p>Action: To hold regular updates and briefings with stakeholders.</p> <p>Progress: First meeting of the Devolution Working Group was held on 19 May 2025, a draft set of terms of reference were drawn up.</p>	Chief Executive Officer	In progress	Principle: E Monitored via: Bi-Monthly Working Group Meetings, regular updates at OSPCC weekly team meeting.	<p>The road map for the devolution process has not yet been formalised, although the elections for the first Mayor have been scheduled for May 2026. The Head of Performance leads on the coordination of the working group and has developed a draft terms of reference for the meeting to work through.</p>

Appendix - how is the review undertaken?

As part of the annual review, the PCC engages with relevant stakeholders across Sussex Police and external contributors, including but not limited to;

- The Senior Officer Teams
- Portfolio and Thematic Leads (Collaborated and Force Specific)
- Corporate Planning (including Risk Management and HMICFRS Inspection Coordination)
- Evidence and assurance gathering via staff survey
- Chief Internal Auditor
- Joint Audit Committee
- External Audit Partner

Priorities



- Internal audit reports and actions
- External inspection recommendations
- Independent Advisory Groups, Scrutiny Panels and Ethics Committee contributions
- External audit reports and opinion
- Joint Audit Committee feedback and The Police & Crime Panel requests for information
 - Organisational Reassurance Board
 - Organisational Learning Board
 - Annual governance review
 - Accountability Meetings
 - Chief Officer Assurance Statements
 - Annual risk assurance review
- Code of Corporate Governance
- Strategies
- Policies Framework
- Codes / APPs
- Processes
- Training
- Change / Transformation
- Action plans

Process

- The approach and schedule for the production of the Annual Governance Statement was ratified in meetings with the PCC and senior management.
- Regular alignment meetings are held with Sussex Police because we share systems and processes.
- SMT approved this AGS on 19 May 2025.
- The review undertaken and evidence to support the assessment is reported to the Joint Audit Committee.
- The Joint Audit Committee have sight of the Annual Governance Statement actions at every meeting. They recommend the signing of the final AGS after review and completion of the external audit.
- It is planned that the final AGS will be recommended for approval by the PCC after the September JAC. However, this is dependent on the External Auditor accounts audit schedule.

Useful links

Information signposting;

- [Code of Corporate Governance](#)
- [Memorandum of Understanding](#), [Decision-Making Framework](#), [Scheme of Delegation](#), [Financial Regulations](#) and [Contract Standing Orders](#)
- [Statement of Accounts](#)
- [Policing Protocol Order 2011](#)
- [Joint Audit Committee](#)
- [Annual Governance Statement](#)
- [Publication Scheme Policy](#)
- [Gifts & Hospitality, Business Interests](#) and [Expenditure over £500](#)
- [Complaints Procedure](#) and [Complaints Policy](#)
- [Code of Ethics](#)
- [Competency and Values Framework](#)