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Sussex Police  
**Chief Constable's Annual Governance Statement**  
2022-23

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## 1 Introduction

- 1.1 This annual governance statement sets out how Sussex Police has complied with the corporate governance framework set out in the Code of Corporate Governance for the Sussex Police and Crime Commissioner and the Chief Constable<sup>1</sup> in place for the year ended 31 March 2023. It also details areas of improvement to further enhance governance arrangements that the force plans to progress during 2023-24.
- 1.2 Publication of the draft unaudited accounts and AGS deadline is 31 May 2023. Publication of the final audited accounts and AGS deadline is 30 September 2023.
- 1.3 It is designed to complement the annual governance statement of the Sussex Police and Crime Commissioner (PCC), to give the full picture of governance within Sussex Police and the Office of the Police and Crime Commissioner for Sussex.
- 1.4 This statement 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 external review.
- 1.5 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).

## 2 Scope of Responsibilities

- 2.1 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.
- 2.2 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 Force 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.
- 2.3 The Chief Constable has a statutory responsibility for the control, direction and delivery of operational policing services provided by Sussex Police (hereafter referred to as the Force), 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.

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<sup>1</sup> Code of Corporate Governance: [code-of-corporate-governance-2022.pdf \(sussex-pcc.gov.uk\)](https://www.sussex-pcc.gov.uk/code-of-corporate-governance-2022.pdf)

- 2.4 Sussex Police continues to follow the principles of the CIPFA Framework: ‘Delivering Good Governance in Local Government’<sup>2</sup> and the guidance notes for policing bodies (revised 2016)<sup>3</sup>.
- 2.5 Sussex Police also uses the CIPFA Financial Management Code (CIPFA FM Code) to support good practice in financial management and to assist in demonstrating financial sustainability.
- 2.6 This statement explains how the Force 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.
- 2.7 The Force’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)’<sup>4</sup>.

### 3 The Purpose of the Governance Framework

- 3.1 The governance framework comprises the systems, processes, culture and values by which the Force is directed and controlled, together with its activities through which it accounts to and engages with the community.
- 3.2 It enables the Force to monitor the achievement of its strategic objectives, as set out by the PCC in the Police and Crime Plan<sup>5</sup> and the Strategic Policing Requirement<sup>6</sup>, and to consider whether those objectives have led to the delivery of appropriate, cost-effective services, including achieving value for money.
- 3.3 The fundamental function of good governance in the public sector is to ensure that intended outcomes are achieved whilst acting in the public interest at all times.

### The Governance Framework

- 4.1 The Chief Constable of Sussex Police is responsible for operational policing matters, the direction and control of police personnel, and for putting in place proper arrangements for the governance of the Force. The PCC is required to hold her to account for the exercise of those functions and those of the persons under her direction and control. It therefore follows that the PCC must be assured that the Force has appropriate mechanisms in place for the maintenance of good governance and that these operate in practice.
- 4.2 A governance framework, collectively known as the Scheme of Corporate Governance, has been in place for the year ended 31 March 2023 and includes the Code of Corporate Governance, Memorandum of Understanding, Decision-making Framework, Scheme of Delegation, Financial Regulations and Contract Standing Orders. The Force system of internal control, based on a framework of policies and procedures, is a significant part of the Force governance framework and is designed to manage risk to a reasonable and foreseeable level. The Force cannot eliminate all risk of failure to achieve policies, aims and objectives; it can only provide reasonable but not absolute assurance of effectiveness.

<sup>2</sup> “Delivering Good Governance in Local Government” <http://www.cipfa.org/policy-and-guidance/publications/d/delivering-good-governance-in-local-government-framework-2016-edition>

<sup>3</sup> “Delivering Good Governance in Local Government” and the guidance notes for policing bodies (revised 2016) <http://www.cipfa.org/policy-and-guidance/publications/d/delivering-good-governance-guidance-notes-for-policing-bodies-in-england-and-wales-2016-edition>

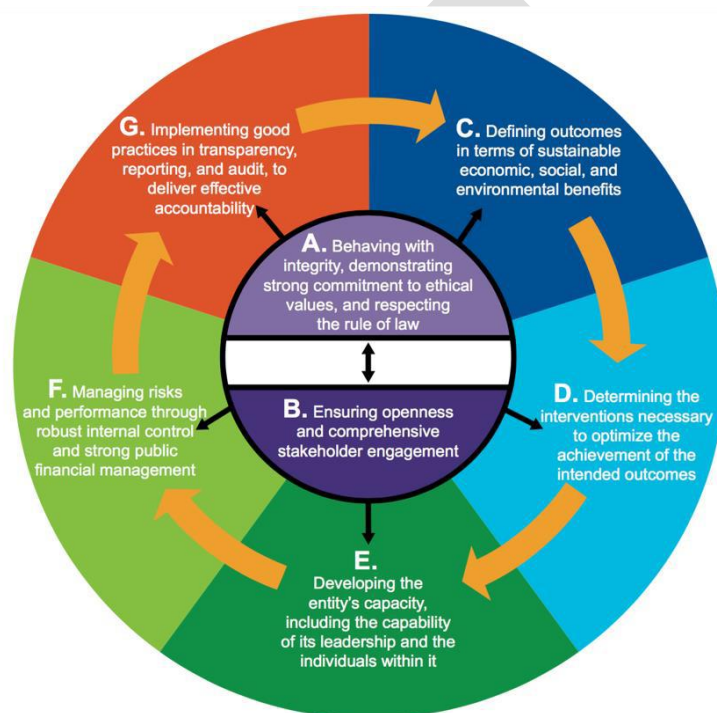
<sup>4</sup> The role of the Chief Finance Officers in Policing was updated in March 2021 and is published behind a paywall.

<sup>5</sup> Police and Crime Plan: <https://www.sussex-pcc.gov.uk/our-priorities/police-crime-plan/>

<sup>6</sup> Strategic Policing Requirement: <https://www.gov.uk/government/publications/strategic-policing-requirement>

4.3 The Code of Corporate Governance for the Sussex Police and Crime Commissioner and Chief Constable for Sussex Police and all strategic governance documents that comprise the Scheme of Corporate Governance were reviewed in 2022-23 (with Contract Standing Orders being updated later due to legislative changes later in that year) as part of the annual review of governance documentation and are available on the PCC's website<sup>7</sup>. The joint Code provides a summary of governance arrangements setting out responsibilities<sup>8</sup>. The Code also details a diarised programme for the regular review of policies. A key element of this is the identification and management of risk.

4.4 Governance arrangements for both the Force and the PCC follow the seven principles as set out in the revised Delivering Good Governance: Guidance Notes for Policing Bodies in England and Wales (2016 Edition). 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 force complies with these principles is detailed below.



**4.5 Principle of Good Governance: A Behaving with integrity, demonstrating strong commitment to ethical values, and respecting the rule of law.**

To achieve this, the Chief Constable has:

- ensured that officers and staff carry out their respective roles in a climate of openness, support and respect;
- developed standards of conduct and personal behaviour which are defined and communicated through appropriate codes of conduct and protocols and the policing Code of Ethics;
- undertaken a review of the Force approach to legitimacy and ethics and the existing governance arrangements with the intention to utilise the Code of Ethics as the framework to renew focus and develop a new approach to ethical dilemmas;
- continued to emphasise to staff the importance of crime data integrity and what constitutes compliance with the national standards for crime recording, to ensure effective crime investigation and prevention. His Majesty's Inspectorate of Constabulary and Fire & Rescue

<sup>7</sup> Governance Documents: <https://www.sussex-pcc.gov.uk/about/transparency/how-we-work/>

<sup>8</sup> Code of Governance: [code-of-corporate-governance-2022.pdf \(sussex-pcc.gov.uk\)](https://www.sussex-pcc.gov.uk/code-of-corporate-governance-2022.pdf)

Services (HMICFRS) undertook an inspection of crime data integrity in Sussex Police<sup>9</sup> and renewed work is underway in order to address;

- ensured an anti-fraud, bribery and corruption policy is in place (updated Jan 2023) which clearly sets out the procedures to be operated and which is designed to encourage prevention, promote detection and identify a clear pathway for the investigation of fraudulent and/or corrupt practices or behaviour;
- ensured that the Force is compliant with all relevant anti money laundering legislation;
- ensured accessible, appropriate and long established whistle-blowing arrangements and processes in place and that these are regularly reviewed;
- ensured that the requirements of the Policing and Crime Act 2017 relating to police conduct reforms are complied with (effective from 1 February 2020), including procedures for dealing with and investigating complaints which are in line with legal requirements and national guidelines;
- ensured that Sussex Police remains proactive in preventing and responding to cases involving “Abuse of Position”, which includes raising awareness for staff and partners as part of an action plan developed by the Professional Standard Department;
- ensured that officers and staff have easy reference to key information that relates to integrity accessible through the Force intranet;
- reviewed the national report Vetting, Misconduct and Misogyny<sup>10</sup> (published November 2022) with all recommendations directed at forces being addressed via a task and finish group to monitor implementation progress;
- ensured that there are appropriate policies in place that relate to media relations and integrity and also the use of social media (updated December 2021);
- regularly published chief officer expenses, gifts and hospitality<sup>11</sup> (received and declined) and outside business interests of senior officers and staff<sup>12</sup>;
- ensured that the Force is compliant with General Data Protection Regulation, which came into force on 25 May 2018, and the Data Protection Act 2018;
- ensured that Sussex Police complies with the Best Use of Stop and Search scheme, publishing data on the POLICE.UK website<sup>13</sup>
- maintains an established Stop and Search Public Scrutiny Panel, comprising independent members of the community to provide an external view on the legitimacy, effectiveness and fairness of the use of these powers by officers - in 2018 this was extended to scrutiny of use of force (N.B. a separate Use of Force Scrutiny Panel was established meeting for the first time on 30 June 2021);
- published the first Stop and Search Annual report on the force website to provide a transparent view of the use of Stop and Search powers in Sussex over the last twelve months<sup>14</sup>
- His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) undertook an inspection of Engaging with and treating the public with fairness and respect which Sussex were graded as Good<sup>15</sup>. Innovative practice was recognised in the report around internal legitimacy review of the use of police power

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<sup>9</sup> HMICFRS Sussex PEEL Assessments 2020/21: [Sussex PEEL Assessments 2020/2021 - His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services \(HMICFRS\) – Home | His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services \(HMICFRS\) – Home \(justiceinspectorates.gov.uk\)](https://www.justiceinspectorates.gov.uk/hmicfrs/sussex-peel-assessments-2020-2021/)

<sup>10</sup> HMICFRS National Report: [An inspection of vetting, misconduct, and misogyny in the police service - His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services \(HMICFRS\) – Home | His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services \(HMICFRS\) – Home \(justiceinspectorates.gov.uk\)](https://www.justiceinspectorates.gov.uk/hmicfrs/national-report-2022/)

<sup>11</sup> Gifts and hospitality register: [SUSSEX GIFTS & HOSPITALITY - QUARTER 4 - 01.01.2023 - 31.03.2023](https://www.sussex.police.uk/policies/gifts-and-hospitality/)

<sup>12</sup> Business interests register: [SUSSEX BUSINESS INTERESTS - QUARTER 4 - 01.01.2023 - 31.03.2023](https://www.sussex.police.uk/policies/business-interests/)

<sup>13</sup> Best use of Stop and Search: <https://www.sussex.police.uk/policies/best-use-of-stop-and-search/>

<sup>14</sup> Stop and Search Data: <https://www.sussex.police.uk/policies/stop-and-search-data/>

<sup>15</sup> HMICFRS Sussex PEEL Assessments 2020/21: [Sussex PEEL Assessments 2020/2021 - His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services \(HMICFRS\) – Home | His Majesty’s Inspectorate of Constabulary and Fire & Rescue Services \(HMICFRS\) – Home \(justiceinspectorates.gov.uk\)](https://www.justiceinspectorates.gov.uk/hmicfrs/sussex-peel-assessments-2020-2021/)

- ensured there is a Force policy regarding use of force, and that it is compliant with Independent Office of Police Conduct (IOPC), (formerly the Independent Police Complaints Commission), report recommendations<sup>16</sup>, which includes the responsibility to fully document at the earliest opportunity the extent and method of force used, and the rationale for that force;
- ensured that recommendations included in the Office of Biometrics Commissioner inspection report of Sussex Police (December 2018) were implemented;
- ensured that recommendations included in the Surveillance Camera Commissioner: Survey and Assessment of Police Capabilities and /Compliance have been implemented;
- ensured that the Force has met its equality and diversity obligations as set out in the Equality Act 2010 and the Public Sector Equality Duty 2011. There is a well-established quarterly Equality, Diversity and Inclusion Board which provides the governance for delivery of the EDI strategy to achieve positive change, promote inclusion and deliver on priorities;
- continued to develop the work of the Legitimacy and Ethics Board (formed jointly with Surrey Police in 2017), to ensure that both forces are compliant with relevant Authorised Professional Practice and forces' policies and to improve the scrutiny and governance arrangements in relation to key aspects of policing in Surrey and Sussex, including Stop and Search, Use of Force and the use of body worn video;
- in 2022, Sussex Police (working with Surrey Police) developed their local approach to the national NPCC Police Race Action Plan and introduced a Race Action Plan Insights and Delivery board focused on Race Action Plan Implementation Delivery. The plan replicates the detailed overview of actions for forces as outlined in the national document. However, in order to recognise the breadth of diversity across our force areas and the challenges we need to meet locally, this local plan identified further actions to address, extended across all ethnically diverse communities. This is described in the Race Action Plan as Black, Asian and minority ethnic, to enable meaningful data comparisons, using Home Office condensed ethnicity groups. Additionally Sussex Police have appointed a Trust and Legitimacy Assistant Chief Officer and introduced the Race Equality Advocates in all departments, to accelerate understanding and integration of race awareness and anti-racism within Sussex Police.
- signatories of the Business In the Community Race at Work Charter making a commitment to workplace equality<sup>17</sup>.
- re-accredited as Disability Confident Leaders in 2022 by the Government's Disability Confident Scheme<sup>18</sup>, which supports employers to make the most of the talents that disabled people can bring to a workplace. Surrey and Sussex Police were among the first forces to achieve the Level 3 'Leader' award – the highest level possible – and the Department for Work and Pensions have now confirmed this status for a further three years.

#### **4.6 Principle of Good Governance: B Ensuring openness and comprehensive stakeholder engagement.**

To achieve this, the Chief Constable has:

- ensured that Force engagement with the public takes place on many levels, from daily street contact and phone calls through to contact via social media (Facebook, Twitter etc.), on line interaction via the force website and formal surveys in relation to service priorities;
- Community Engagement Strategy feeds into community profiles to ensure district plans are built from the community itself;
- held regular meetings with local communities offering local people a chance to be heard, to discuss issues that affect them, to agree local action to tackle these issues and agree priorities;
- worked with partner organisations - through community safety partnerships and a range of others to tackle crime, disorder, anti-social behaviour and to reduce re-offending;

<sup>16</sup> IOPC Use of Force: Police Conduct website

<sup>17</sup> [Race at Work Charter Signatories - Business in the Community \(bitc.org.uk\)](https://www.bitc.org.uk/race-at-work-charter-signatories)

<sup>18</sup> [Disability Confident – Are you disability confident?](https://www.dwp.gov.uk/disability-confident-are-you-disability-confident/)

- engaged with Independent Advisory Groups, whose membership reflect different sections of the community, to encourage the active involvement of people from diverse groups;
- ensured that user satisfaction surveys across a range of victim groups (beyond the statutory requirement) are conducted to a high standard, providing the Force with information about the quality of service these groups have received from the police service;
- used targeted opinion research to understand consumer perceptions and behaviours for effective targeting of crime prevention and behavioural change campaigns. In 2022-23 this included research through surveys and focus groups around Violence against women and girls and also Drink Driving;
- maintained Sussex Police website having joined the national initiative “Single On-line Home”, which offers an enhanced self-service feature for the public, greater consistency of advice and guidance and an improved user experience;
- ensured each district hub has a tailored communications and engagement plan for their area;
- continued to increase the amount of performance and workforce data available through the Force website to ensure transparency and to encourage increased public accountability;
- ensured there is an up to date Freedom of information Act 2000 publication scheme;
- ensured transparency through publishing as much information as possible on subjects where there is known to be public interest, following the legally approved model publication scheme issued by the Information Commissioner.

#### **4.7 Principle of Good Governance: C Defining outcomes in terms of sustainable economic, social and environmental benefits.**

To achieve this, the Chief Constable has:

- produced the required Force Management Statement<sup>19</sup> detailing demand for police services and Sussex Police resourcing to meet these demands, together with details of identified areas to be addressed through investment;
- established a Medium Term Financial Strategy<sup>20</sup> supported by robust, sustainable multi-year budgets to deliver the Police and Crime Plan;
- decided how the quality of service for users is to be measured and ensured that the information needed to regularly and effectively review service quality is available;
- established a robust performance framework that ensures that the Chief Constable is informed of progress against key indicators;
- has continued to review the key functions, departments and activities, to ensure that the delivery of all elements of policing are effective and efficient;
- actively pursued joint working opportunities at a local, regional and national level, which has resulted in a number of policing services being delivered in collaboration with other organisations and bodies, particularly with the Surrey PCC and Surrey Police;
- established with Surrey Police a Change Delivery function which recognises the importance of strategic planning and integration to incorporate national, regional and local change, business change/adoption and change assurance;
- continued to ensure there is a robust mechanism to record and respond to recommendations and findings from external review, including HMICFRS and the IOPC, which is overseen by the Organisational Reassurance Board, chaired by the Deputy Chief Constable;
- Sussex Police currently has an Environmental Policy and Environmental Plan awaiting final ratification. This incorporates a Net Zero plan. The current force goal is 2050. In the meantime, all capital projects at Sussex Police are considered for environmental impact, we are increasing levels of electric cars in the fleet and have a number of environmentally orientated projects including use of solar panels

<sup>19</sup> Sussex Police Force Management Statement 2023: [PENDING NEW LINK – Due for publication June / July 2023](#)

<sup>20</sup> Medium Term Financial Strategy: <https://www.sussex-pcc.gov.uk/about/transparency-complaints/what-we-spend-how-we-spend-it/medium-term-financial-strategy-202226/>

#### **4.8 Principle of Good Governance D: Determining the interventions necessary to optimise the achievement of the intended outcomes.**

To achieve this, the Chief Constable has:

- undertaken an annual review of the corporate governance framework and key high level governance documents, including the Code of Corporate Governance ensuring the Code is aligned with the CIPFA guidance published in 2016;
- ensured that there is a risk management strategy and policy, reviewed by the Joint Audit Committee, in place to ensure that threats to the achievement of the Force's organisational objectives and regional and national responsibilities are identified and managed effectively (reviewed April 2022);
- developed a risk assurance process to ensure there is effective internal and external scrutiny of the management of strategic risks;
- continued to use a performance framework based on force priorities/strategic objectives, with a focus on qualitative assessment of behaviours and performance and root-cause analysis of issues;
- continued to ensure that Power Bi Dashboards, and Data and Insight packs are developed, available on line, allowing more users within the force to self-serve and access information previously unavailable to them;
- continued the role of the Strategic Planning Board, chaired by the DCC, to review and align the output of the Medium Term Financial Strategy and the Force Management Statement;
- ensured detailed demand data is compiled by the force and is presented monthly at the Force Strategic Planning Board to ensure monitoring of resources against requirements;
- ensured that there is robust scrutiny of the change programmes to ensure that significant and complex change programmes are monitored, reviewed and delivered effectively;
- subjected key strategic projects to specific oversight arrangements, including frequent review of the level of intervention required by the PCC and CC;
- the Force has introduced an annual change planning cycle which supports the annual business planning process, taking into consideration the Medium Term Financial Strategy and Force Management Statement/Delivery Plan;
- reviewed existing change governance arrangements (including three levels of governance boards: Change Engagement Meeting; Change Assessment Board and Strategic Change Board) to ensure that the annual change plan is delivered effectively and changes to the plan are minimised;
- ensured post implementation reviews have been undertaken of key change programmes to provide assurance of benefit delivery, with processes in place for follow up on the completion of any additional actions;
- in 2021-22 HMICFRS assessed Sussex Police through the PEEL programme of inspections and assessed Sussex as "Adequate" for strategic planning, organisational management and value for money, areas for improvement will be addressed;
- a Services Transformation Programme (STP) is being developed to build a policing service that is sustainable, effective and can operate within the budget constraints currently facing both forces and within the context of significant financial challenges being faced.

#### **4.9 Principle of Good Governance E: Developing the entity's capacity, including the capability of its leadership and the individuals within it.**

To achieve this, the Chief Constable has:

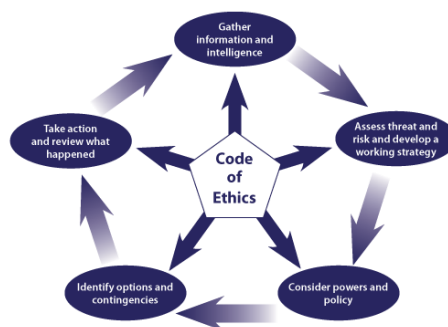
- established clear roles and responsibilities for each of the Force's senior officers;
- developed a workforce plan introduced across Surrey Police and Sussex Police and reviewed regularly, which identifies the future workforce mix and profile requirements;
- ensure performance dashboards are in place to assist with identifying skills gaps and also the diversity elements to all workforce planning;

- ensured a process is in place for individual performance review and management – “Focus”, which ensures regular constructive feedback on performance and areas for improvement;
- continuation of a Succession Planning Framework, known as Future Focus, which enables line managers to undertake career planning with staff and officers, identifying talent at the same time as succession planning for critical roles within departments and putting in place plans to minimise risks if this is required;
- ensured local talent pools are embedded in the Force to develop and support future leaders in conjunction with Future Focus;
- developed a leadership strategy and framework based on the national Competency and Values Framework – as part of the leadership programme the aim is to increase capability in good leadership for officers and staff across Surrey and Sussex;
- ensured that Force capability continues to be monitored at the Capacity, Capability and Performance Board (CCPB);
- ensured specific work was undertaken to address the gap in detectives the Force is experiencing with the Heads of Crime Investigative Improvement Programme (HocIIP);
- promoted an ethos of continuous improvement across the Force and been proactive in promoting innovative practice in order to reduce organisation costs and improve performance, including ensuring that staff have every opportunity to help shape organisational change and service improvement, for example through the on-line forum “Innovate” and Organisational Learning Board;
- continued to work with Unison, the Police Federation and the Superintendent’s Association using the seven point plan (launched February 2017) to enable a consistent approach to how assaults on staff and officers are dealt with, supplementing this with the introduction of Op Hampshire in 2022 which is a dedicated intranet site to assist;
- developed the work of the Wellbeing Board, attended by representatives from Surrey Police and Sussex Police as well as staff associations, allowing workforce concerns to be raised and acted upon;
- established a Wellbeing Strategy, revised every two years to factor in emerging and identified needs, which defines the meaning of “wellbeing” and why it is important.
- in 2021-22 HMICFRS assessed Sussex Police through the PEEL programme of inspections and assessed Sussex as “Adequate” for Building, supporting and protecting the workforce areas for improvement will be addressed;

#### 4.10 Principle of Good Governance F: Managing risks and performance through robust internal control and strong public financial management.

To achieve this, the Chief Constable has:

- ensured that all decision making is carried out in accordance with the governance framework as set out in the Code of Corporate Governance;
- continued to work to embed ethical decision making at all levels following the National Decision Model (NDM), which has at its centre the policing Code of Ethics;



- developed and maintained effective arrangements to challenge and scrutinise the Force's own performance - this includes the development of the Sussex Police performance dashboard and the development of the PEEL Board and Force Performance Board which allows scrutiny of delivery against the Police and Crime Plan by both the Force and PCC;
- compared performance against peer data as provided by HMICFRS Value for Money profiles,<sup>21</sup> seeking improvement where best practice was identified;
- ensured individual change programmes are built on comprehensive business cases to secure value for money, effective resources management, and projected benefits;
- ensured change programme and project expenditure was scrutinised and challenged by chief officers via relevant programme and project boards led by chief officers;
- ensured that there is a process in place between Change Delivery and Finance to manage and monitor the delivery of savings, which has been incorporated into the budget setting process.
- ensured that a risk management strategy and policy is embedded in the governance structure and is used effectively to inform and focus decision making;
- ensured that effective business continuity arrangements are in place to meet the requirements outlined in the Civil Contingencies Act 2004;
- ensured data protection and information management policies and strategy are in place;
- ensured a process is in place for Information Sharing Agreements to be reviewed and updated regularly;
- ensured that chief officers sign assurance statements for their portfolio responsibilities for 2023<sup>22</sup>.

#### **4.11 Principle of Good Governance: G Implementing good practices in transparency, reporting and audit to deliver effective accountability.**

To achieve this, the Chief Constable has:

- ensured that the Force undergoes extensive internal and external inspection and that the results of these inspections are available on line;
- ensured that internal audit is provided through a managed service contract with the Southern Internal Audit Partnership and regular updates are provided to the Joint Audit Committee<sup>23</sup>;
- ensured that information is published to allow appropriate scrutiny of decision making<sup>24</sup>;
- ensured that the public are able to attend police disciplinary hearings to observe proceedings<sup>25</sup>
- continued to support the work of the Joint Audit Committee in its role of monitoring Force governance and internal control.

## **5 Review of Effectiveness**

5.1 The Chief Constable has responsibility for conducting a regular review of the effectiveness of the governance framework, including the system of internal audit and control. This annual governance statement provides a summary of activities undertaken and areas for continuous improvement identified through the Force review of the governance arrangements; these have been included in the action plan for delivery in 2022-23.

<sup>21</sup> HMICFRS Value for Money profiles Sussex 2022/23: <https://www.justiceinspectorates.gov.uk/hmicfrs/our-work/article/value-for-money-inspections/value-for-money-profiles/value-for-money-dashboards/>

<sup>22</sup> Chief Officer Assurance Statements: <https://www.sussex.police.uk/police-forces/sussex-police/areas/au/about-us/governance-and-processes/chief-officer-assurance-statements/>

<sup>23</sup> Joint Audit Committee: <https://www.sussex-pcc.gov.uk/about/transparency/joint-audit-committee/>

<sup>24</sup> Sussex Police website: <https://www.sussex.police.uk/foi-ai/af/accessing-information/>

<sup>25</sup> Misconduct Hearings: <https://www.sussex.police.uk/advice/advice-and-information/mis/misconduct-hearings/>

- 5.2 This review has been informed by the work of the Corporate Development Department who have the responsibility for the development and maintenance of the governance environment. The Corporate Development Department has co-ordinated the review of the governance arrangements by senior managers across the Force in order to assess the Force compliance with the CIPFA guidance.
- 5.3 The review of the evidence for the effectiveness of the governance framework, to confirm that the current arrangements are fit for purpose, was presented to the February meetings of the Force Organisational Reassurance Board and the March Joint Audit Committee<sup>26</sup>. The review also provided updates and confirmation regarding the completion of areas for improvement identified in the annual governance statement<sup>27</sup>.
- 5.4 Assessments and recommendations made by the internal and external auditors and other review agencies and inspectorates have also informed this review.
- 5.5 The Joint Audit Committee has been consulted on the development of the annual governance statement. The final statement is considered at Joint Audit Committee meeting on 26 September 2023 for recommendation for approval by the Chief Constable. The Committee aims to ensure that there is continuous improvement in the process and endorses the resulting annual action plan. Regular updates on progress to address the areas for improvement are provided to the Committee.
- 5.6 A process is established to ensure the Chief Constable and Sussex PCC, approve and sign off the annual governance statement, in accordance with the CIPFA guidance.

## 6 Governance Issues

- 6.1 Under the Accounts and Audit (England) Regulations 2015, the Police and Crime Commissioner and Chief Constable are responsible for establishing and maintaining appropriate risk management processes, control systems, accounting records and governance arrangements. Internal Audit plays a vital role in advising the PCC and Chief Constable that these arrangements are in place and operating effectively.
- 6.2 The internal audit function is carried out by Southern Internal Audit Partnership (SIAP) for both the PCC and the Chief Constable. Audit reviews are undertaken in line with an annual internal audit plan, which is recommended by the Joint Audit Committee.
- 6.3 Internal reviews throughout the year identified a number of areas for improvement. These improvements, to further enhance the Force governance arrangements, are detailed in Appendix A together with any on-going areas for improvement continuing to be progressed from the action plan included in the 2022-23 annual governance statement. The actions to achieve these improvements will be monitored through the Force Organisational Reassurance Board and reported to the Joint Audit Committee.
- 6.4 In 2022-23 no Internal Audit reviews gave an opinion of no assurance.
- 6.5 Management have agreed recommendations to address all the findings reported by the internal audit service during 2022-23.

<sup>26</sup> Force review of evidence of compliance: [it-12-cover-report-ags.pdf \(sussex-pcc.gov.uk\)](#)

<sup>27</sup> Force AGS action plan update: [it-12-ags-force-action-plan-february-2023.pdf \(sussex-pcc.gov.uk\)](#)

6.6 The CIPFA code requires Internal Audit to provide an opinion on the overall adequacy and effectiveness of the governance framework. The annual Internal Audit opinion for 2022-23 for the framework of governance was “reasonable overall assurance”.

## 7 Certification

This statement has been prepared on the basis of the review of effectiveness of governance arrangements. Advice and recommendations on the annual governance statement have been received from internal and external auditors and the JAC. It represents a fair and reasonable assessment of current arrangements and plans for improvement within Sussex Police.

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



**Jo Shiner, Chief Constable – Sussex Police**



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## Appendix A: Areas for Improvement - Action Plan 2022-2023

Ref	Area for improvement	Owner	Status
<b>ISSUES IDENTIFIED BY EXTERNAL BODIES: HMICFRS<sup>28</sup>/IOPC<sup>29</sup>/OBC<sup>30</sup>/SCC<sup>31</sup> TO BE INCLUDED IN 2021-22 AGS ACTION PLAN:</b>			
1 (previous Action 4 21/22)	<b>Office of the Biometrics Commissioner (OBC) report recommendations (published December 2018)</b> 8 recommendations contained in the report received December 2018. Actions to be addressed to be overseen by the Local Policing Accountability and monitored by the Organisational Reassurance Board.	ACC Local Policing	<b>COMPLETE</b> Sep-22 visit identified no new areas for further formal recommendation
2 (previous Action 5 21/22)	<b>HMICFRS Spotlight report Shining a light on betrayal (published April 2020)</b> <b>Recommendation 4A:</b> By April 2020, all forces that haven't yet done so should: <ul style="list-style-type: none"> <li>record corruption using the national corruption categories;</li> <li>produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and</li> <li>establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people.</li> </ul> Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as reasonably practicable.	Deputy Chief Constable / Head of PSD	<b>COMPLETE</b>
	<b>Recommendation 4B:</b> By September 2020, all forces should have completed a review of their use of encrypted apps on police ICT systems to understand the risk they pose and to take any necessary steps to mitigate that risk.	Deputy Chief Constable / Chief Digital and Information Officer	<b>COMPLETE</b>
	<b>Recommendation 5:</b> By April 2020, all forces that haven't yet done so should make sure they have enough people with the right skills to look proactively for intelligence about those abusing their position for a sexual purpose, and to successfully complete their investigations into those identified.	Deputy Chief Constable / Head of PSD	<b>COMPLETE</b>
3 Previous Action 8 21/22)	<b>HMICFRS IPA 2018-19 (published February 2020)</b> <b>AFI 9:</b> The force should improve its workforce's knowledge and understanding of the abuse of position for a sexual purpose	Deputy Chief Constable / Head of PSD	<b>COMPLETE</b>
4 Previous Action 8 21/22)	<b>HMICFRS IPA 2018-19 (published February 2020)</b> <b>AFI 11:</b> The force needs to provide a more consistent preventative approach to wellbeing and prioritise the health of its staff by identifying and supporting staff who are struggling and taking any necessary action	Director of People Services	<b>COMPLETE</b>
5 Previous Action 11 21/22)	<b>HMICFRS IPA 2018-19 (published February 2020)</b> <b>AFI 12:</b> The force should improve how it records and monitors its 'Focus' discussions to ensure they are consistently applied across the force and effectively capture issues such as poor performance.	Director of People Services	<b>COMPLETE</b>
6 Previous Action 13 21/22)	<b>HMICFRS report 2021 – Disproportionate use of police powers. A spotlight on stop and search and the use of force</b> <b>Recommendation 1:</b> - By July 2022, forces should ensure that officers and staff have effective communication skills, in line with the National	ACC Ops Command	<b>COMPLETE</b>

<sup>28</sup> His Majesty's Inspectorate of Constabulary (HMICFRS)

<sup>29</sup> The Independent Office for Police Conduct (IOPC)

<sup>30</sup> Office of the Biometrics Commissioner (OBC)

<sup>31</sup> Surveillance Camera Commissioner (SCC)

	Policing Guidelines on Conflict Management. This should be in addition to existing training on conflict management and de-escalation.		
7 (previous Action 14 21/22)	<b>Recommendation 2:</b> By July 2021, forces should ensure that communication skills are reinforced as part of the programme of continuing professional development for officers and staff, and that supervisors are supported to routinely and frequently debrief officers on these skills using body-worn video footage.	ACC Ops Command	<b>COMPLETE</b>
8 (previous Action 15 21/22)	<b>Recommendation 3:</b> By September 2021, forces should: <ul style="list-style-type: none"> <li>• ensure that officers record on body-worn video (when this is available) the entirety of all stop and search encounters, including traffic stops and use of force incidents;</li> <li>• have a structured process for regularly reviewing and monitoring internally a sufficient sample of body-worn video footage to identify and disseminate learning and hold officers to account when behaviour falls below acceptable standards; and</li> <li>• provide external scrutiny panel members with access to samples of body-worn video footage showing stop and search encounters and use of force incidents, taking account of the safeguards in the College of Policing's Authorised Professional Practice.</li> </ul>	ACC Ops Command	<b>COMPLETE</b>
9 (previous Action 16 21/22)	<b>Recommendation 5:</b> By July 2021, forces should ensure they have effective internal monitoring processes on the use of force, to help them to identify and understand disproportionate use, explain the reasons and implement any necessary improvement action.	ACC Ops Command	<b>COMPLETE</b>
10 (previous Action 17 21/22)	<b>Recommendation 6:</b> By July 2021, forces should ensure they have effective external scrutiny processes in place in relation to the use of force. Forces should take account of feedback and update the scrutiny panel and the community on the action taken.	ACC Ops Command	<b>COMPLETE</b>
11 (previous Action 18 21/22)	<b>Recommendation 7:</b> With immediate effect, forces should ensure that all stop and search records include detail of the self-defined ethnicity of the subject. When this information is refused by the subject, the officer-defined ethnicity code should be recorded.	ACC Ops Command	<b>COMPLETE</b>
12 (previous Action 19 21/22)	<b>Surveillance Camera Commissioner (SCC): Survey and Assessment of Police Capabilities and /Compliance (published November 2019)</b> 3 recommendations contained in the survey report to be reviewed and assurance reported to the Organisational Reassurance Board that the force is compliant with the recommendations and that there is continuing governance in place.	ACC Ops Command	<b>COMPLETE</b>
<b>ISSUES IDENTIFIED FROM INTERNAL AUDIT 2019-20</b>			
13 (previous Action 21 21/22)	<b>IT – Data Storage and Backup – Limited Assurance</b> 5 high, 5 medium, 1 low level management actions 1 outstanding	Chief Digital and Information Officer	<b>COMPLETE</b>

14 (previous Action 27 21/22)	<b>IT - Business Continuity/Disaster Recovery Planning - Limited Assurance</b> 10 medium level management actions	Chief Digital and Information Officer	<b>COMPLETE</b>
<b>ISSUES IDENTIFIED FROM INTERNAL AUDIT 2020-21</b>			
15 (previous Action 28 21/22)	<b>IT Asset Management and Software Licensing</b> 1 high, 11 medium level management actions	Chief Digital and Information Officer	<b>COMPLETE</b>
16 (previous Action 29 21/22)	<b>IT Systems Life Cycle Support and Planning</b> 5 medium and 3 low level management actions 3 outstanding  Full details are monitored via the internal audit tracking process and recorded on the force register, overdue actions are reported into the Organisational Reassurance Board until the force deems implemented and complete with supporting commentary, this is also reported to the Joint Audit Committee.	Chief Digital and Information Officer	Target date: 31.12.21 Anticipated: 31.03.24 <b>ONGOING renumbered Action 01 for 2022-23</b>
<b>ISSUES IDENTIFIED FROM INTERNAL AUDIT 2021-22</b>			
17 (previous Action 31 21/22)	<b>SSP Uniform Stores</b> 13 medium and 5 low level management actions	Chief Finance Officer	<b>COMPLETE</b>
18 (previous Action 32 21/22)	<b>Firearms Licensing</b> 4 high, 4 medium and 1 low level management actions	ACC Ops Command	<b>COMPLETE</b>
19 (previous Action 33 21/22)	<b>Emergency Services Mobile Communications Programme</b> 3 high and 3 medium level management actions	SERIP Director	<b>COMPLETE</b>
<b>AREAS OF IMPROVEMENT IDENTIFIED BY FORCE FOR 2021-22 AGS ACTION PLAN</b>			
20 (previous Action 36 21/22)	<b>Compliance Code of Practice for Victims of Crime</b> Ensure appropriate governance arrangements are in place to ensure compliance with the force obligations under the Code of Practice for Victims of Crime	Head of CDD	<b>COMPLETE</b>
21 (previous Action 37 21/22)	<b>Freedom of Information Act 2000 compliance</b> Improve process to ensure that the force meets its obligations under the Freedom of Information Act 2000, section 45 Freedom of Information Code of Practice, linking to risks STR2031 and STR2711 on the force risk register.	Head of CDD	<b>COMPLETE</b>
<b>AREAS OF IMPROVEMENT IDENTIFIED BY FORCE FOR 2022-23 AGS ACTION PLAN</b>			
22 (previous Action N/A 21/22)	<b>Review of the College of Policing Code of Ethics results and any new recommendations for the force.</b> An internal survey and recommendations around Ethics has been undertaken by the force and these will also be implemented over the coming year. Full details are monitored via the force risk register and reported in to the Organisational Reassurance Board until the force deems complete.	Head of CDD	<b>COMPLETE</b>
23 (previous Action N/A 21/22)	<b>Risk external scrutiny</b> Agree new approach for JAC report review of top strategic risks at their meetings. Full details are monitored via the force risk register and reported in to the Organisational Reassurance Board until the force deems complete and will subsequently feature in Joint Audit Committee reporting.	Head of CDD	Target date: 30.06.23 <b>ONGOING renumbered Action 02 for 2022-23</b>