



## SUSSEX POLICE & CRIME PANEL

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To: Head of Performance, Office of Sussex Police and Crime Commissioner

Dear Graham,

The Panel received a complaint on 8 November, concerning various matters related to the Commissioner's interests. Although the Clerk found the central allegations to be unsubstantiated, the complaint did raise issues around the publication of such interests which we wish to bring to your attention and seek your view on.

1. We note that, at the time of writing, no register of interests (RoI) appears to be published for the Commissioner on the Sussex Police and Crime Commissioner website. There clearly is an area on the website where it is intended for this information to be published, and it has been available here in the past, so we assume that this is a temporary oversight.
2. The complainant, from their own research, has determined that the Commissioner appears to currently be a director of the Association of Police and Crime Commissioners and Bluelight Commercial Limited, and was a director of Police Digital Service until July 2022. Although (per 1 above) we cannot verify whether or not the former two interests have been declared, the latter was not declared on an archived RoI dated 6 December 2021.

The Elected Local Policing Bodies Order 2011 states that "a register of interests of relevant office holders, including every paid employment or office or other pecuniary interest of each relevant office holder" must be published. Although it may be the case that the Commissioner is not remunerated for her directorships, given that these bodies are connected with policing, it would improve transparency if all directorships could be published, in one place. We note that some directorships are mentioned in the "Your PCC" section, but even here the situation is not completely clear. For example, the Commissioner's profile mentions her being "a non-Exec Director of the national Police ICT Company" – but this could refer to former role at Police Digital Service or equally her current role at Bluelight Commercial Limited.

In fairness, we recognise there is inconsistency in how commissioners have complied with their duties in this area. Where, for example, some of the other commissioners who are directors of Bluelight have elected to set this out on their register of interests, for others it is difficult to even find any mention of a RoI on their websites.

We look forward to receiving your response in due course, which we will publish on the website along with this letter.

Best wishes,

*Ninesh Edwards*

Ninesh Edwards

Senior Advisor to Sussex Police and Crime Panel, on behalf of the Clerk to the Panel.

CC: PCP website.