



Telephone: 01953 424455

Date: 9 October 2026

Dear Member of Public,

RE: Freedom of Information Request FOI/OPCCN/271

I am writing in connection with your email dated 11 September 2026, in which you requested the following information:

"Please could you provide:

- 1. The expected working hours of the Police and Crime Commissioner**
 - Is the PCC's role considered full-time?
 - What are the expected or contracted working hours for the role, if such hours are formally specified?
- 2. Actual working hours**
 - Does the OPCC record or monitor the hours worked by the PCC?
 - If so, please provide the relevant records or summaries of the PCC's working hours for the period from his election to the date in this email.
 - If individual daily records are not held, please provide any information held showing the PCC's recorded or declared working commitment during this period.
- 3. Secondary employment and paid work**
 - Is the PCC permitted to undertake secondary employment, paid consultancy, freelance work, directorships, speaking engagements, writing, broadcasting or other paid professional activities alongside their role as PCC?
 - If so, please provide the relevant policy, rules, guidance or code governing such activities.
 - Please state whether the PCC is required to seek approval before undertaking any secondary employment or paid activity.

4. **Current outside employment or paid activities**
 - Please provide details of any current paid employment, consultancy, directorships, freelance work, professional engagements or other paid activities undertaken by the PCC alongside his role as Police and Crime Commissioner, insofar as these are recorded by the OPCC or are required to be declared.
 - For each activity, please provide the nature of the work, the organisation or entity involved, and the date from which the interest has been held.
5. **Register of interests**
 - Please provide the current register of interests for the PCC, including details of any paid employment, office or other pecuniary interest.
 - Please also provide the date on which the current declaration was made or last updated.
6. **Conflicts of interest**
 - Please provide any policy or guidance setting out how potential conflicts between the PCC's official duties and outside employment or paid activities are assessed and managed.
 - Please provide details of any declarations, approvals, restrictions or conflict-of-interest assessments relating to the PCC's outside employment or paid activities since his election."

I have reviewed our records and can advise the following:

1. The [Police Reform and Social Responsibility Act 2011](#) ("The Act") does not specify contractual or working hours, treating the position of Police and Crime Commissioner (PCC) as an officeholder rather than a standard employee. Despite the lack of statutory hours, PCC roles are treated as full-time public office posts due to the broad scope of holding chief constables to account and managing local crime plans.
2. The OPCC does not record or monitor the hours worked by the PCC. No information held regarding declared working commitment between 16 July 2026 and 11 September 2026.
3. The Act does not prohibit PCCs from holding external business interests or undertaking paid work outside of the role, provided they continue to discharge their statutory responsibilities. The Act does not require a PCC to seek prior formal approval for secondary employment, however any outside role should be declared by the PCC and assessed by the Local Policing Body to avoid any potential conflict of interest.
4. This information is published on our website here: [Notification of Disclosable Interests for the Police and Crime Commissioner for Norfolk](#). No further information held.

5. Please refer to the response provided in question 4. This document was signed by the PCC on 12 August 2026.
6. Please refer to the responses provided in questions 3 and 4 and the PCC's Code of Conduct here: [PCC's Signed Code of Conduct - July 2026](#). Please see attached notes from a conversation held in-person on 10 August 2026 between the OPCCN Chief Executive and Director of Governance who were discussing several matters, including the PCCs notification of disclosable interests. The PCC joined the conversation and at that point he raised the possibility of attending a theatre tour which his promoter was working on.

Yours sincerely

Office of the Police and Crime Commissioner for Norfolk

Internal Review

If you think we have not supplied information in accordance with Section 1 (the General Right of Access) of the Freedom of Information Act 2000, or you are dissatisfied with the way in which your request has been handled, then you should write within 40 calendar days of the date of the response to:

Mark Stokes
Chief Executive
Office of the Police and Crime Commissioner for Norfolk
Building 7
Falconers Chase
Wymondham
Norfolk
NR18 0WW

Telephone: 01953 424455

Email: opccn@norfolk.police.uk

If you are dissatisfied in any way with our response or the way we have handled your request, you can contact us by phone, email or in writing. We may, in the first instance, try and resolve your complaint informally. However, at any stage you can request, or we may decide to treat your complaint formally under our internal review process.

An internal review is conducted by the Chief Executive who will review the request and response, taking account of your complaint(s), and will respond in writing as soon as possible. The Information Commissioner's Office recommends that a response should be made in 20 working days. If we are unable to respond in this timeframe, we will inform you and provide a date by which you should expect to receive our response.

If, after the internal review, you remain dissatisfied then you can complain to the Information Commissioner's Office, the government regulator for the Freedom of Information Act. Details of how to contact the Information Commissioner's Office can be found at www.ico.org.uk

File Note

Date: 10 August 2026

Attendees: Colin Sutton PCC,
Mark Stokes CEO & MO / Sharon Lister Director and DMO

Subject: Theatre Tour Enquiry 2027

During a meeting with the PCC and Sharon about the Police and Crime Plan update, and Disclosable Interests, the PCC raised a separate point and asked for advice regarding a proposed external commitment.

The PCC explained that he previously undertook a Theatre Tour in 2024, and that his promoter has approached him about doing another tour in 2027. His understanding of the tour is that it will involve a small number of shows, approx. 14 which are expected to be all in the evenings and at weekends. He did not have the details as yet to confirm.

The PCC said that he does not expect any impact on the PCC role, stating he will remain fully contactable, they are all evening shows and any impact re travel would be covered by annual leave. This would all be in his spare time.

Discussion

Sharon and I discussed with the PCC the general expectations around private commitments, most importantly for the Office to ensure that the PCC can carry out his role and that there are no conflicts with the requirements of the job.

Based on what the PCC has described, there are no immediate concerns, however I said that we needed to know what the details are, especially the itinerary to check if there were any potential clashes with PCC statutory meetings or other commitments that might affect his ability to fulfil the role.

I also noted that this linked to the PCCs position as a remunerated Director of ADO15 Ltd, as stated in the Disclosable Interests.

Conclusion

Based on the information provided today, I am satisfied that there is no immediate indication of any impact on the PCCs role. A final view will be reached once the confirmed itinerary and associated details are provided.

Mark Stokes

10/08/2026

Meeting with CEO Mark Stokes, Sharon Lister Director of Governance and PCC Colin Sutton - 10th August 2026

Having discussed the Disclosable Personal Interests requirements with the Chief Executive in a scheduled meeting this morning, the PCC joined us and we caught up on a number of items including the Police and Crime Plan consultation preparations and the PCCs Discloable Personal Interest requirements whereby we discussed his directorship with ADO15 and what this company entailed.

Following that discussion the PCC wanted to raise with us the possibility of him attending his theatre tour which his promoter were currently working on. The PCC went on to explain that he had undertaken a previous tour some years earlier and what the format would entail and that this would involve his attendance at a number of theatres across the UK but would be no more than about 14 events. These events would primarily be held in the evening with mostly weekends and that he could attend those in his own time but the odd one would be during the week and would require some travel.

The PCC asked what the annual leave entitlement was for the PCC as he would take annual leave if he had to travel during the week. I advised that the PCC was not on an employment of contract as his role was an elected one and that there was no allocated annual leave. I further advised that this would be something we would discuss as and when he required leave so we could work with his diary to ascertain what commitments needed to be managed and whether there were any prior commitments that needed attendance if they were mandatory requirement of the PCC role.

In terms of his attendance on the tour dates both Mark and I said that if he was available for PCC decisions through contact on MS Teams or via telephone then we could not see any issue with his attendance or a conflict of interest as this was linked to his discloable interest with his paid directorship of ADO15.

The PCC agreed he would have his laptop and work phone with him and that he will remain available and contactable should any operational or other PCC-related business require his attention.

Given the above assurances both myself and Mark were satisfied with the proposal and would await further confirmation from the PCC once he had liaised with his promoter.