

**To:** Joint Audit Committee  
**Date:** 27<sup>th</sup> July 2017  
**By:** Alison Bolton, Chief Executive OPCC  
Bob Lockyer, Force Vetting Manager, Surrey Police  
**Title:** Review of Gifts and Hospitality

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**Purpose of Report/Issue:**

For the Committee to review the records of Surrey Police and the Office of the Police & Crime Commissioner in respect of recording and monitoring gifts and hospitality. For completeness, the report also covers disclosable interests.

The Committee's Terms of Reference state that it must, *"review compliance within the Surrey Police Force and Office of the Surrey Police & Crime Commissioner, with the policies and procedures governing declarations of interest and the receipt of gifts and hospitality"*.

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**Recommendations**

That the Committee notes the report.

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**Risk** – None arising.

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**Equalities / Human Rights Implications** – no specific implications are raised by this report.

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## **Policies for Gifts, Hospitality and Declarations of Interest**

Contract Standing Orders set out the policies and processes for recording receipt of gifts and hospitality and also for declaring interests in a contract.

## **Office of the Police & Crime Commissioner – Arrangements for Recording Gifts and Hospitality**

The Police and Crime Commissioner (PCC) and his staff are required to provide information about any gifts or hospitality which they are offered in a business capacity. This includes disclosure of those that are accepted or declined. It includes hospitality and gifts from members of the public, or local and national organisations. The PCC and his staff must notify the PCC's Support Officer in writing within 28 days of receiving a gift or hospitality.

Any gifts or hospitality received are regularly published on the website for transparency. The Office of the PCC also maintains a paper record. The Elected Local Policing Bodies Specified Information Order (2012) as amended, requires PCCs and relevant office holders to "*register each offer of a gift or hospitality..., indicating whether the offer was accepted or refused*".

Police & Crime Commissioner David Munro publishes details of any gifts and hospitality records here:

[http://www.surrey-pcc.gov.uk/wp-content/uploads/2012/09/May-17\\_Website.pdf](http://www.surrey-pcc.gov.uk/wp-content/uploads/2012/09/May-17_Website.pdf)

We have appended a copy of the latest record of gifts and hospitality records for the PCC (previous and current) and officers of the OPCC to this document.

## **Chief Constable's Gifts and Hospitality**

All gifts and hospitality forms completed by the Chief Constable are reviewed by the Chief Executive of the Office of the Police & Crime Commissioner prior to receipt by the Head of the Professional Standards Department and publication on the Force website.

## **Surrey Police – Arrangements for Recording Gifts and Hospitality**

Surrey Police has in place a comprehensive policy for recording gifts and hospitality for its officers and staff. This is attached at Appendix 1. Surrey Police publishes a sanitised version of the completed proformas on its website. This is the link:

<http://www.surrey.police.uk/About-Us/Your-right-to-information/Published-information>

All completed forms are reviewed and kept by the Joint Force Vetting Unit.

## **Disclosable Interests**

Surrey Police maintains a register of disclosable interests for senior staff and officers of the Force and the PCC (Superintendent and above and all staff in

the highest salary band). This records any interests or transactions between an officer or member of staff (and their families) with those who hold positions of influence. For example, a firm where the officer or staff member is a director or has a beneficial interest. The Office of the PCC is obliged to publish the register of interests for the PCC, any Deputy and for senior staff. Links are shown below:

[http://www.surrey-pcc.gov.uk/wp-content/uploads/2017/04/2017\\_David-Munro.pdf](http://www.surrey-pcc.gov.uk/wp-content/uploads/2017/04/2017_David-Munro.pdf)

[http://www.surrey-pcc.gov.uk/wp-content/uploads/2017/06/Alison-Bolton\\_2017.pdf](http://www.surrey-pcc.gov.uk/wp-content/uploads/2017/06/Alison-Bolton_2017.pdf)

Information on disclosable interests is included within the Statement of Accounts.

### **Oversight by the Audit Committee**

The Committee's role is to review compliance within the Surrey Police Force and Office of the Surrey Police & Crime Commissioner, with the policies and procedures governing declarations of interest and the receipt of gifts and hospitality.

Records of gifts and hospitality for the Office of the PCC are presented to the Committee on a bi-annual basis.

## Procedure

### Governing Policy

Anti-Fraud and Anti-Corruption Policy (Subject to Change)

### Introduction

The aim of this document is to outline the procedure to accepting and recording of gifts, discounts, hospitality and declarations of interest.

### Procedure Statement

The acceptance of gifts, discounts, gratuities or hospitality can undermine personal and professional integrity and can lead to allegations of corrupt practices or improper relationships with members of the public or corporate bodies.

#### 1. Application

This Procedure applies to

- Police Officers
- Police Staff
- Police Community Support Offices (PCSOs)
- Police Support Officers (PSOs)
- Special Constabulary
- Volunteers

#### 2. Introduction

2.1 Police officers and staff must act with honesty and integrity and must not compromise or abuse their position. They should never solicit the offer of any gift, gratuity, favour or hospitality in any way connected to or arising from their role within the police service, whether on or off duty.

2.2 No officer or member of staff will produce a warrant card or ID card, or wear whole or part uniform, to obtain discounts, goods or services unless as part of an approved arrangement (see 3 below). This includes using a

warrant or ID card to gain free access to nightclubs, sporting events or other commercial premises.

2.3 Officers and staff must not accept any gifts or hospitality from journalists/members of the press.

2.4 Accepting free or discounted food or services whether on or off duty is unacceptable if the provision is because the donor is aware of the recipient's role.

2.5 There is a clear distinction between a gift, which may include something as simple as a hot beverage, creating an implicit obligation on the part of the police and refreshment that is an integral part of routine policing and builds public confidence. This procedure should not be interpreted in a way that would, for example, prevent neighbourhood staff from drinking a cup of tea with a Surrey resident in the course of their duties in the community. Officers and staff should be sensitive to accepting hospitality in commercial establishments where even the perception of an inducement might occur and adversely affect the Force's reputation.

2.6 This procedure should not be interpreted in a way that would, for example, prevent neighbourhood staff from accepting light refreshments as a common courtesy in line with policing duties, or inexpensive promotional products from partnerships or conferences. It is important however, that officers and staff be fully aware that in circumstances where an unsolicited offer of a personal gift or gratuity is made, the assumption should be that it will be politely declined.

2.7 Staff must not accept personal gifts of money (or gift vouchers) in the course of their duties or employment (including in any off duty situation) where the gift is related to, or may appear to have a connection to their duties or employment, under any circumstances, except as a donation to the Force. Where an offer of a gift of cash is made it will be declined, reported to a supervisor and a gift & hospitality pro forma document will be submitted.

2.8 This Policy does not apply to individuals acting in their capacity as part of any approved secondary employment or declared business interest.

### **3. Discounts from Retailers**

3.1 Many large employers provide schemes whereby their staff can obtain discounted products from a variety of different businesses. This is a common practice and is often seen as part of an incentive or retention package. Within Surrey Police we have the Stop & Save scheme but over time various other companies have offered a variety of different discounts to our staff. The police service must guard against any suggestion that staff could be influenced by a deal offered by a particular company.

3.2 In line with the Professionalism Action Plan, agreement has been made that it is appropriate for officers and staff to be eligible for discounts provided to them because of their roles within Surrey Police subject to a set of principles.

3.3 The following principles apply;

- All offers will be approved by PSD before circulation through the Information Hub and the Surrey Police Federation website.
- Discounts should apply to all Surrey Police personnel irrespective of rank or position (although there can be geographically targeted offers in individual cases)
- The discounts should not be disproportionate
- Agreements will only be approved where there is no likelihood of bringing the force into disrepute
- When applying for an approved discount personnel may use their staff ID/warrant card as identification

3.4 The Head of PSD will assess any offers as to whether there is potential (either perceived or actual) for it to be detrimental to public confidence.

3.5 Where an offer is made by a single business (i.e. not part of a chain) it will generally not be accepted; this would effectively be a more 'personal' offer where there is a greater opportunity for direct contact and more danger of the personnel providing a different service as a result. While it is accepted this could benefit larger retailers rather than small local businesses, a consideration must be given to potential risks of corruption.

3.6 Where an offer is made it should not be exclusively for Surrey Police personnel, but should be part of a wider scheme where other local businesses or services also receive the same benefit (i.e. All emergency services personnel including military). There may be some cases where the discount is only applicable to Surrey Police but this should be very rare and will only be applicable where the goods/service offered is directly relevant to the role.

#### **4. Raffle Prizes**

4.1 No officer or member of staff should approach corporate bodies, local businesses or business partners seeking the donation of prizes for a raffle.

#### **5. Uniform and Equipment as gifts**

5.1 Requests for uniform items to be given as gifts to visiting Forces or to take as gifts when visiting other Forces will be refused due to the security risks linked to the impersonation of Police officers

## **6. Sponsorship**

6.1 The scope of this policy does not relate to any formal arrangements around sponsorship

## **7. Loyalty Cards//Point Schemes**

There can be no individual gain when purchasing items or fuel for work purposes.

Advantages such as reward point schemes/air miles etc. cannot be collected

## **8. Procedure**

All offers of gifts and hospitality will be recorded whether they are accepted or not. A Gifts and Hospitality proforma must be submitted within seven working days of receipt of any gift or hospitality.

8.1 In determining whether hospitality should be accepted the following should be considered

- The value and significance of the gift/hospitality?
- Who is offering the hospitality and what is the motive of the person offering the gift//hospitality?
- What are the background circumstances?
- What does the donor expect in return?
- Would this compromise or could it create the perception of favour in the way a service is provided or is to be provided in the future?
- Is there a business relationship in existence where the provision and acceptance would compromise an individual's impartiality or may give the impression of doing so?
- Is it considered to be in the interest of the Force to accept or attend?
- Is acceptance likely to damage the reputation of Surrey Police?

8.2 If presented with a gift/hospitality, which it would be discourteous to refuse, it may be accepted and the donor should be advised that permission to retain the gift/accept the hospitality will be sought.

8.3 If the value is less than £50 it may be authorised by the line manager. Anything of a value in excess of £50 must be referred to the Head of Joint Force Vetting Unit for approval.

## **9. Declaration of Interest**

9.1 The Force holds existing contracts with suppliers and at times will actively undertake ongoing procurement for goods and services.

9.2 The offer of a gift or hospitality perceived to be with the object of obtaining preferential treatment should be declined. In such instances the gifts and hospitality pro forma will be completed.

9.3 Any officer or member of staff who has either a potential or established interest in any Contract or agreement placed or to be placed for or on behalf of Surrey Police must:-

- Immediately declare that interest to their line manager and complete a hospitality, gifts and declaration of interest pro forma
- Immediately remove him/herself from the process.

## **10. Recording**

10.1 A single register will be maintained and a sanitised version will be available on the Surrey Police website to demonstrate transparency.

## **11. Relevant law**

11.1 The Bribery Act 2010 (which came into force 1 July 2011) describes Bribery as 'Intending to bring about (or reward) improper performance by another person of a relevant function or activity'. It states bribery is offering, promising or giving an advantage knowing or believing that acceptance of the advantage itself constitutes improper performance. The Act states:

- 'Advantage' is financial or other advantage;
- Where a person agrees to receive or accepts something of value, bribery occurs whether or not the person actually receives it;
- The test is what 'a reasonable person' in the UK would expect;

A public official (including a police officer) cannot receive hospitality from an individual that would leave the officer beholden to that individual.

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/Refused	Justification for Acceptance/Refusal	Approximate Value (£)
PCC Munro	Suffolk Police	10/01/2017	Refreshments	London	Accepted	Attended EDHR Committee Meeting in London	5.00
PCC Munro	Shah Jahan Mosque	11/01/2017	Refreshments	Woking	Accepted	Met with the Woking Taxi Association at the Mosque	3.00
PCC Munro and Alison Bolton	APCC	25/01/2017	Refreshments and Lunch	London	Accepted	Attended APCC Board meeting all day in London	£15.00
PCC Munro and Alison Bolton	APCC	26/01/2017	Refreshments and Lunch	London	Accepted	Attended APCC General Meeting in London all day	£15.00
PCC Munro	Crimestoppers	27/01/2017	Refreshments	Godstone	Accepted	Visited Crimestoppers at their Godstone office	£3.00
PCC Munro	Surrey County Council	06/02/2017	Refreshments	Surrey	Accepted	Attended the Police and Crime Panel	£3.00
PCC Munro and Alison Bolton	National Crime Agency	07/02/2017	Refreshments and Lunch	London	Accepted	NCA/PCC National Engagement Day in London all day	£10.00
PCC Munro	Sight for Surrey	09/02/2017	Refreshments	Fetcham	Accepted	Met with individuals from Sight for Surrey	£3.00
PCC Munro and Craig Jones	KSS CRC	10/02/2017	Refreshments	Guildford	Accepted	Went on a visit to the KSS CRC offices in Guildford for a morning	£5.00
PCC Munro	Home Office	13/02/2017	Refreshments	London	Accepted	Met with Lyle Wilton at the Home Office	£3.00
PCC Munro	British Transport Police	13/02/2017	Refreshments	London	Accepted	Met with Adrian Hanstock at the BTP HQ	£3.00
PCC Munro and Craig Jones	The Amber Foundation	21/02/2017	Lunch	Ockley	Accepted	Craig and David were invited to visit the Amber Foundation, and were asked to join them for lunch	£15.00
PCC Munro	Outline	23/02/2017	Refreshments	Woking	Accepted	Attended 'a cup of LGBT history' conference in Woking	£5.00
PCC Munro and Johanna Burne	Surrey Fire & Rescue Service	24/02/2017	Refreshments	Reigate	Accepted	Attended the Emergency Services Collaboration Programme Steering Board	£3.00
PCC Munro	Woking Street Angels	26/02/2017	Refreshments and snacks	Woking	Accepted	Attended a commissioning service for Woking's newest Street Angel	£10.00

PCC Munro	Surrey Heartlands STP	28/02/2017	Refreshments	Weybridge	Accepted	Met with Julia Ross, SRO for Surrey Heartlands	£3.00
PCC Munro	Surrey Hills	01/03/2017	Refreshments	Gomshall	Accepted	David met with Rob Fairbanks the Surrey Hills AONB Director	£3.00
PCC Munro and Sarah Haywood	Guildford Borough Council	06/03/2017	Refreshments	Guildford	Accepted	David and Sarah attended a meeting at the council offices regarding Surrey University students	£3.00
PCC Munro and Alison Bolton	Sussex Police	08/03/2017	Refreshments	Lewes	Accepted	David and Alison attended the Criminal Justice Partnership Meeting	£3.00
PCC Munro	Surrey County Council	09/03/2017	Refreshments	Kingston	Accepted	David attended the Health and Wellbeing Board at County Hall	£3.00
PCC Munro	City of London Freeman's School	13/03/2017	Refreshments	Ashted	Accepted	David met with the Headteacher of the City of London Freeman's School	£3.00
PCC Munro	Betchworth Rural Parishes	14/03/2017	Refreshments	Betchworth	Accepted	David attended the Betchworth rural parishes meeting and gave a presentation	£3.00
PCC Munro and Alison Bolton	APCC	15/03/2017	Refreshments	London	Accepted	David and Alison attended the APCC General meeting in London	£5.00
PCC Munro and Alison Bolton	Surrey County Council	15/03/2017	Refreshments	Kingston	Accepted	David and Alison attended the Community Safety Board	£3.00
PCC Munro	Lord-Lieutenant of Surrey	15/03/2017	Refreshments	Woking	Accepted	David attended the Poppy appeal cadet evening	£10.00
PCC Munro	APCC	20/03/2017	Dinner	London	Accepted	Attended the APPG on Mental Health	£15.00
PCC Munro	Surrey County Council	23/03/2017	Refreshments	Brookwood	Accepted	Attended the Surrey Civilian Military partnership Board	£5.00
PCC Munro	Cranleigh Rotary Club	23/03/2017	Dinner	Cranleigh	Accepted	Presented to Cranleigh Rotary Club	£20.00
PCC Munro	Surrey County Council	24/03/2017	Refreshments	Gomshall	Accepted	Attended the YES Graduation Ceremony	£10.00
PCC Munro/Craig Jones/Damian Markland	Thomas Knyvett College	28/03/2017	Refreshments	Ashford	Accepted	Attended a meeting at the college about Social Media Law and Ethics	£3.00
PCC Munro	Reform	30/03/2017	Refreshments	London	Accepted	Attended a Criminal Justice Reform conference in London	£10.00

PCC Munro	British Transport Police	30/03/2017	Refreshments	London	Accepted	Met with Chief Constable Ian Hopkins	£3.00
PCC Munro and Nathan Rees	HMP Brixton	05/04/2017	Refreshments	London	Accepted	Met with the Prison Radio Association at HMP Brixton	£3.00
PCC Munro	British Transport Police	06/04/2017	Refreshments	London	Accepted	Attended the Police and Public Consultation Forum	£3.00
PCC Munro and Alison Bolton	Surrey County Council	06/04/2017	Refreshments	Kingston	Accepted	Attended the Health and Wellbeing Board	£3.00
PCC Munro	Woking Debates	08/04/2017	Refreshments	Woking	Accepted	Attended the Woking Debate on Does Prison Work?	£5.00
PCC Munro	Surrey Fire & Rescue Service (SFRS)	11/04/2017	Refreshments	Reigate	Accepted	Attended the SFRS HQ for a tour	£3.00
PCC Munro	Enterprise M3 LEP	13/04/2017	Refreshments	Basingstoke	Accepted	Met with the Chair of M3 LEP Geoff French	£3.00
PCC Munro and Craig Jones	HMP Bronzefield	18/04/2017	Refreshments	Ashford	Accepted	David and Craig had a tour of HMP Bronzefield	£3.00
PCC Munro	NACRO	19/04/2017	Refreshments	London	Accepted	David attended the NACRO 50th Anniversary Celebration	£10.00
PCC Munro	Kingston Liberal Synagogue	22/04/2017	Refreshments	Long Ditton	Accepted	David attended a 50 years celebration	£10.00
PCC Munro	Surrey Chamber of Commerce	25/04/2017	Breakfast	Guildford	Accepted	David gave a presentation at a Chambers Power Breakfast	£20.00
PCC Munro	Guildford Crown Court	26/04/2017	Refreshments	Guildford	Accepted	Meeting with Judge Fraser	£3.00
PCC Munro	Knaphill Residents' Association	26/04/2017	Refreshments	Knaphill	Accepted	Guest speaker at Association Meeting	£3.00
PCC Munro	KSS CRC	27/04/2017	Refreshments	Redhill	Accepted	Networking event	£10.00
PCC Munro	Metropolitan Police Service (Sutton)	28/04/2017	Refreshments	Sutton	Accepted	Meeting with Borough Commander	£3.00
PCC Munro	Wonersh Parish Council	04/05/2017	Refreshments	Wonersh	Accepted	Guest speaker at Parish Annual Assembly	3.00
PCC Munro	Woking Chamber of Commerce	05/05/2017	Refreshments	Woking	Accepted	Guest speaker at Chambers Breakfast Meeting	10.00
PCC Munro	Twelve Lunch Club	25/05/2017	Lunch	Ripley	Accepted	Guest at lunch club of Surrey business owners	15.00
PCC Munro	Country Land and Business Association (CLA)	29/05/2017	Breakfast	Guildford	Accepted	Guest at CLA Breakfast meeting at Surrey County Show	10.00
PCC Munro	Surrey County Agricultural Society	29/05/2017	Lunch	Guildford	Accepted	Guest at Presidents' Lunch at Surrey County Show	25.00

PCC David Munro	West Yorkshire Police	16/06/2017	Lunch and refreshments	Leeds	Accepted	Provided as part of National LGBT Conference	10.00
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