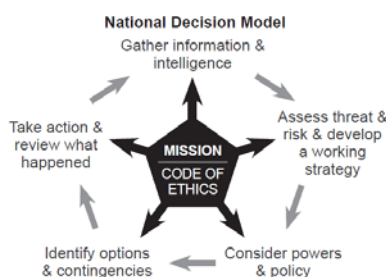




### Review of Gifts from Third Parties and Sponsorship Strategy

<b>Required for:</b>	Joint Audit Committee, 24th April 2019
<b>Security Classification:</b>	<b>Official</b>
<b>Handling information if required:</b>	n/a
<b>Suitable for publication:</b>	Yes
<b>Title:</b>	Review of Gifts from Third Parties and Sponsorship Strategy
<b>Version:</b>	1
<b>Purpose:</b>	To provide an update to the Joint Audit Committee on gifts and sponsorship.
<b>ACPO / Strategic Lead:</b>	CFO
<b>National Decision Model compliance:</b>	Yes
<b>Date created:</b>	26 <sup>th</sup> March 2019
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#### What are the Policing Principles?

Accountability	<input checked="" type="checkbox"/>	Fairness	<input checked="" type="checkbox"/>	Honesty	<input checked="" type="checkbox"/>
Integrity	<input checked="" type="checkbox"/>	Leadership	<input checked="" type="checkbox"/>	Objectivity	<input checked="" type="checkbox"/>
Openness	<input checked="" type="checkbox"/>	Respect	<input checked="" type="checkbox"/>	Selflessness	<input checked="" type="checkbox"/>

## **1. Background**

The responsibility regarding gifts and sponsorship is included in the Financial Regulations under Gifts, Loans & Sponsorship (see appendix A).

A Surrey and Sussex policy and procedure for donations and sponsorship is in place to ensure that all donations and offers of sponsorship are held centrally (see appendix B).

The Force does not as a rule give gifts to third parties, there is not a policy relating to gifts to third parties contained in the Financial Regulations.

## **2. Gifts to third parties**

The Force does not as a rule give gifts to third parties, there is not a policy relating to gifts to third parties contained in the Financial Regulations.

The Joint Transport Service keep records of vehicle disposals and have the following as a donated vehicle:

- 2018/19 - Mercedes Sprinter donated to Surrey Scouts by the PCC.

## **3. Gifts received**

Surrey Police has in place a comprehensive policy for recording gifts and hospitality for its officers and staff. Surrey Police publishes a sanitised version of the completed pro-forma on its website. The policy was included in Gifts and Hospitality report received by the Joint Audit Committee in July 2018. The 2018/19 gifts and hospitality register is included at appendix C.

## **4. Loans**

The Force does not as a rule loan property to or from third parties. Any such agreements would be approved at a local level.

## **5. Sponsorship**

Surrey Police has in place a comprehensive policy for recording sponsorship agreements (see appendix B). There are currently three such agreements in place which relate to sponsored vehicles within the Joint Transport Service as follows:

- TOYOTA-RAV4 – Provided by Toyota
- VAUXHALL-ASTRA – Provided by Banham Security
- SKODA OCTAVIA – Provided by Absolute Security

An example is: the Skoda Octavia is provided by Absolute Security. This lease commenced in November 2018 for 3 years. The vehicle has the Surrey Police Crest along with Absolute Security details, with the wording "Working in partnership to reduce crime".

## **6. Recommendations**

Committee members are asked to note this report

**Financial Regulations:****4.8 Gifts, Loans & Sponsorship**

The PCC's CFO & the CC's CFO are responsible for ensuring that all gifts of money, gifts or loans of other property, including sponsorship, which are received by the PCC or the CC or their officers or staff, are properly recorded in the financial statements. As a general rule officers and staff may only accept gifts of low intrinsic value.

The PCC or the CC may accept gifts, loans and sponsorship from any source which has genuine and well-intentioned reasons for wishing to support specific police projects. In return the provider may expect some publicity or other acknowledgement, such as displaying an organisation's name or logo. This is acceptable provided that it does not dominate or detract from the purpose of the supported project.

The CC must refer all gifts, loans and sponsorship above £50,000 to the PCC for approval before they are accepted.

Gifts and loans and sponsorship should not be accepted where there is a risk of offending the integrity or propriety of the police.

Priority shall be given to meeting the needs of the PCC or Police rather than those of any sponsor and care should be taken to avoid association with inappropriate sponsors, giving the impression that sponsors have accrued a commercial advantage, entering into projects of dubious or limited benefit and allowing unacceptable conditions to be attached to sponsorships.

The total value of gifts, loans and sponsorship accepted should not exceed a maximum equivalent value of 1% of the Force annual Net Budget Requirement.

Both CFOs must ensure that registers for the Office of the PCC and the Force are maintained which respectively record, all gifts of money, gifts or loans of other property, including sponsorship.



## Donations and Sponsorship Received from Members of the Public, Companies and other Bodies

### Abstract

This Policy details the types of donations or sponsorship that can be made and the criteria that must be met before either can be considered and accepted by the Surrey or Sussex Police and Crime Commissioner (PCC) or the Surrey or Sussex Chief Constable (CC). This includes an audit trail for accounting and recording to ensure complete transparency.

#### Supporting Documents/Procedures

- [Donations and Sponsorship Pro-forma](#)
- [Donations – Acceptance, Considerations and Principles Procedure](#)
- [Sponsorship Opportunities - Acceptance, Considerations and Principles Procedure](#)

### Policy

#### 1. Introduction

1.1 This policy is required to ensure all donations or offers of sponsorship are assessed, recorded and processed appropriately to provide transparency, demonstrate integrity and support the Financial Governance requirements of the Surrey or Sussex Police and Crime Commissioner and the Surrey Police and Sussex Police Chief Constable.

For the purpose of this policy, 'Force' refers to undertaking the operational policing responsibilities of the Chief Constables only, whereas 'Surrey Police and Sussex Police' refers to activities of both the PCCs and the Chief Constable teams. This policy covers all police officers, police staff and employees of the PCCs.

#### 2. Scope

2.1 This policy defines the types of donations and sponsorship that can be made and the criteria that must be met before either can be accepted. It includes the audit, reporting and agreement process and what should be done if an offer is considered inappropriate and cannot be accepted.

The acceptance of gifts, hospitality and gratuities are not covered by this policy. [Please refer to the Anti-Fraud, Corruption and Bribery Policy for Surrey and Sussex Police.](#)

### 3. Policy Statement

3.1 Public confidence in the Police is crucial in a system that is built on the principle of policing by consent. The Surrey Police and Sussex Police PCC and the Chief Constables will ensure complete openness and transparency and will not accept any donations or offers of sponsorship that will impact on our integrity or ethics or which could be misconstrued as potential preferential treatment by competitors.

## Procedure

### 1. Responsibilities Overview

1.1 By accepting donations or offers of sponsorship within the criteria of this policy, it will provide small but important additional resources to support policing activities. The following must be followed:

- All donations and sponsorship items must be recorded on the Surrey and Sussex [Donations and Sponsorship Pro-forma](#) which can be found in the Forms section of the Information Hub in Surrey and on Sussex Force's templates.
- The Donations and Sponsorship Pro-forma must be submitted to the Joint Force Vetting Unit (JFVU) via e-mail to [businessinterests.vetting@sussex.pnn.police.uk](mailto:businessinterests.vetting@sussex.pnn.police.uk) either in advance or at the latest within seven working days of receipt of any Donations or Sponsorship. All cases will then be centrally recorded on the Core-Vet database within the JFVU.
- All police officers and police staff are responsible for declaring any and all donations made directly to them.

Donation and sponsorship details held on the register will be reviewed by the Head of Professional Standards Department (PSD) in conjunction with the Joint Surrey and Sussex Procurement team. It is also subject to scrutiny by the PCCs.

### 2. Legal Status

2.1 The Police Act 1996 s93(1) provides that:

(1) A Police and Crime Commissioner (PCC) or Chief Constable may, in connection with the discharge of any of its functions, accept gifts of money and gifts or loans of other property provided the terms of their donations appear to be appropriate.

(2) The terms on which gifts or loans are accepted under subsection (1) may include terms for the commercial sponsorship of any activity of the PCC or of the functions of the Chief Constable maintained by it.

2.2 The Home Office Financial Management Code of practice for the Police Forces of England and Wales ('The Code') provides that:

- 'A PCC may decide to accept gifts of money, gifts or loans of other property if they will enable the police either to enhance or extend the service which they would normally be expected to provide. The terms on which gifts, loans and sponsorship are accepted may allow commercial sponsorship of some police force activities'.
- Donations and sponsorship can be accepted from any source which has genuine and well intentioned reasons for wishing to support specific projects. In return, the provider may expect some publicity or other

acknowledgement. It is acceptable to allow the provider to display the organisation's name or logo on publicity material, provided this does not dominate or detract from the purpose of the supported project.

### 3. Definitions

#### 3.1 Donation

A donation is the act or action of transferring ownership of cash or other tangible asset as a free gift. It can also be extended to include services (i.e. free performance of an act or acts) but must not be regarded as a contract or sponsorship or have any commercial intent, obligation or reciprocal commitment.

#### **Sponsorship**

For the purpose of this policy, 'sponsorship' is defined as "the voluntary provision to the police service of non-public funds, services, equipment or other resources."

### 4. **Authorisation to Accept**

4.1 When a donation or offer of sponsorship is received, the Divisional Commander, Head of Department or Chief Executive is responsible for deciding if it is acceptable.

4.2 Delegated Budget Holders are able to accept sponsorship and donations of up to £1,000 on behalf of the Chief Constable in line with the Scheme of Delegation.

4.3 The Chief Constable can accept sponsorship and donations of up to £50,000.

4.4 The Chief Executive may accept a donation or sponsorship up to the value of £50,000 on behalf of the relevant PCC.

4.5 Where the actual or assessed value of a donation or sponsorship exceeds £50,000, the decision to accept must be referred to the relevant PCC for ratification.

4.6 The total value that can be accepted in any one financial year, when considered together with the value of donations or sponsorship, shall not be allowed to exceed a maximum equivalent value of 1% (one percent) of the total police fund budget annually.

### 5. **Associated Policies and Guidelines**

5.1 This policy should be read in conjunction with the following policies and guidelines:

- Anti-Fraud and Corruption Policy
- Income Generation and Charging Policy (Sussex only)

For further information on the types of donation that can be considered and the relevant audit process, please refer to **the** [Donations – Acceptance, Considerations and Principles Procedure](#)

For further information on all aspect of sponsorship, please refer to the [Sponsorship Opportunities - Acceptance, Considerations and Principles](#) Procedure.