



Review of Gifts and Hospitality

Required for:	<i>Joint Audit Committee Meeting April 2022</i>
Security Classification:	Official
Handling information if required:	N/A
Suitable for publication:	Yes
Title:	Review of Gifts and Hospitality
Version:	V.1.0
Purpose:	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.
ACPO / Strategic Lead:	Alison Bolton Chief Executive OPCC
National Decision Model compliance:	Yes
Date created:	29/03/2022
Date to be reviewed:	

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1. Background

The Joint Audit 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”* and *“to consider the adequacy and effectiveness of the (relevant) policies and procedures”*.

2. Policies for Gifts, Hospitality and Declarations of Interest

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

3. Office of the Police & Crime Commissioner – Arrangements for Recording Gifts and Hospitality

The Police and Crime Commissioner (PCC) and her 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 her 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”*.

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

[Web_21-22.pdf \(surrey-pcc.gov.uk\)](http://www.surrey-pcc.gov.uk/Web_21-22.pdf)

4. 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.

5. 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 was revised and re-issued in November 2020, a copy of which attached at Appendix A.

Surrey Police usually publishes a sanitised version of the last quarters recorded Gifts and Hospitality on its website, the last quarter can be seen here; [Gifts and Hospitality | Surrey Police](#)

All completed Gifts and Hospitality forms are reviewed and kept electronically by the Joint Force Vetting Unit on their Core-Vet system.

6. 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:

[NDI_PCC-LisaTownsend-2021.pdf \(surrey-pcc.gov.uk\)](#)

[2020_Alison-Bolton.pdf \(surrey-pcc.gov.uk\)](#)

Information on disclosable interests is included within both the PCC & Chief Constable's Statement of Accounts, as required by the CIPFA Code. The requirement is to disclose all material transactions with related parties, which have potential to influence the Group or to be controlled or influenced by the Group.

To comply with this the PCC and Chief Constable consider all related parties and disclose those that are material to the Statement of Accounts. In collating this data all staff and officers at the equivalent of Superintendent or above are asked annually to complete and sign a related party disclosure, which includes details relating to a spouse, partner, close family and household members.

Examples disclosed in the Statement of Accounts are:

- Central government due to the value of grants received
- Surrey Borough Councils through the precept income
- Collaborative arrangements
- Pension providers

There are examples where staff or officers have noted a related party, however they have found to be irrelevant to the preparation of the Statement of Accounts and therefore have not been disclosed.

Examples are:

- Parish councillor
- Chair of parish council sports & social club
- Close friend of the director of the catering company, however the individual employee had no involvement in the contract

The requirement to disclose an interest is also included in the Contract Standing Orders, which states “Any officer who has either a potential or established interest in any Contract or Agreement placed or to be placed for or on behalf of Surrey/Sussex Police shall: - declare that interest immediately to their Line Manager by completing a Declaration of Interest/Hospitality Pro-forma (refer to respective Force’s policy and procedures) and immediately remove his/herself from the Process. The Line manager shall inform the Head of Joint Procurement Service that the above action has taken place.

7. 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 and to ensure policies and procedures are effective.

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

8. Risks / Equalities

None arising.

9. Human Rights implications (if applicable)

No specific implications are raised by this report.

10. Recommendations

That the Committee notes the report.

11. Attachments / Background Papers

Attachment -A

Procedure

Governing Policy

Gifts, Gratuities and Hospitality Policy (Surrey and Sussex)

Policy

1	Introduction
1.1	This policy provides police officers, special constables and police staff with a framework to determine the boundaries of acceptability regarding the receipt of gifts, gratuity and hospitality.
1.2	This policy is required to ensure police officers, police staff and Special Constables understand the criteria and restrictions for accepting gifts, gratuities and hospitality whilst employed as a member of Surrey Police or Sussex Police (hereafter referred to as the Forces).
1.3	It is recognised that some police volunteer roles may be similar to that of police staff and therefore should be included within this policy.
1.4	An application for a gift, gratuity or hospitality must only be granted if the

Forces are satisfied that there are no issues likely to affect public trust and confidence or conflict with the Code of Ethics or standards of professional behaviour.

2 **Scope**

- 2.1 The procedures provide guidance to all individuals on how to apply for a gift, gratuity or hospitality and the appeal process in the event a request is refused.

3 **Policy Statement**

- 3.1 The Forces will consider gifts, gratuities and hospitality with impartiality and in line with national guidance. We will continue to meet our responsibilities to provide an optimum service to the public we serve whilst protecting the safety and integrity of individuals who have, or seek approval for a gift, gratuity or hospitality. This policy and procedure is designed to promote consistent decision making in respect of those gifts, gratuities and hospitality which are inappropriate and which will adversely affect the reputation of the individual, the Forces, and the wider Police Service.

Procedure

1 **Key Principles**

- 1.1 Police officers, Special Constables and police staff must demonstrate the highest standards of professional behaviour, honesty and integrity. In particular, they must not compromise or abuse their position by soliciting the offer of any gift, gratuity or hospitality in any way connected to or arising from, their role whether on or off duty.
- Where a gift, gratuity or hospitality is given in these circumstances, it must initially be refused. However it is identified that refusing a gift, gratuity or hospitality could be offensive and as such it can be received and given to the line manager of the individual until advice is sought from the Joint Force Vetting Unit (JFVU).
- 1.2 Police volunteers will be dealt with separately and on a case by case basis. Should a gift or hospitality be received by a Police Volunteer, advice should be sought from the JFVU in the first instance.
- 1.3 As a further guiding principle, police officers, Special Constables and police staff must not accept the offer of any gift, gratuity, favour or hospitality without prior approval from the JFVU. This allows a third party viewpoint and independent assessment of any potential compromise or conflict of interest arising from the acceptance of any gift, gratuity or hospitality.
- 1.4 Offers of a gift, gratuity or hospitality vary widely according to the circumstances and will range from readily identifiable examples of criminality (such as a breach of the Bribery Act 2010), through to instances of entirely appropriate and reasonable display of gratitude and common courtesy which do not breach the integrity of any party.

1.5 The provisions of the Bribery Act 2010 contain 2 general offences. These include:-

- Section 1 – Offering, promising or giving of a bribe (active bribery).
- Section 2 – Requesting, agreeing to receive or accepting of a bribe (passive bribery).

The provisions of the Act extend the definition of bribery to include seeking (or agreeing), to bring about improper performance of duties which includes a public function such as policing.

Improper performance amounts to any breach of an expectation that a person will act in good faith, impartially or in accordance with a position of trust.

1.6 The Act does not prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure, intended to improve the image of the Forces and their services or build business relationships. However, it is clear that hospitality, promotional or other similar business expenditure can be employed as a bribe.

Considerations in this regard will include the degree of lavishness of a gift, gratuity or hospitality, its relative value, and the extent to which that gift, gratuity or hospitality is received. The existence or otherwise of previously offered or accepted gifts, gratuities or hospitality may also be relevant.

1.7 During the course of their duties in the community, police officers, Special Constables and police staff may occasionally be offered gifts or hospitality which do not in the circumstances amount to an integrity breach on the part of either party. Examples of such include the provision of light refreshments as a common courtesy in line with policing duties, inexpensive promotional products from partnerships or conferences or discounts aimed at all members of the wider police service.

1.8 Police officers, Special Constables and police staff must be aware that at times a refusal to accept such an offer may cause unnecessary offence or might hinder productive working relationships. Equally to accept such an offer may be mis-interpreted and could lead to inaccurate expectations of favour or service.

1.9 Police officers, Special Constables and police staff must not 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. For example, this includes using a warrant or ID card to gain free access to nightclubs, sporting events or other commercial premises.

1.10 Police officers, Special Constables and police staff must not accept personal gifts of money, which includes 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.

2 **Responsibilities and Contact Details**

2.1 The JFVU has responsibility for gifts, gratuities and hospitality areas of

business, which includes recording, decision making and maintaining the single register for all gifts and hospitality applications for the Forces.

- 2.2 Professional Standards Department (PSD), will ensure scrutiny, auditing and governance of the register in line with wider corporate governance arrangements for integrity and counter corruption.
- 2.3 The register will be reviewed by the Forces respective Head of PSDs in conjunction with the Joint Procurement Service. It is also subject to regular scrutiny by the Surrey or Sussex Office of the Police and Crime Commissioner as appropriate.
- 2.4 The JFVU can be contacted using the below contact details. If you are in any doubt regarding whether a gift, gratuity or hospitality must be declared, advice must be sought from the JFVU as soon as possible.

Joint Force Vetting Unit (JFVU) Gifts and Hospitality Team

Tel: 01273 404478

Email: GiftsandHospitality.Vetting@sussex.pnn.police.uk

3 **Application for Gifts, Gratuities and Hospitality**

- 3.1 All gifts, gratuities and hospitality require approval from the JFVU before they can be accepted. Police officers, Special Constables and police staff need to complete an application form as soon as possible or within a maximum of 7 days from the receipt of the gift, gratuity or prior to any hospitality offered. The gift, gratuity or hospitality must remain with the applicant's line manager, until approval has been given from the JFVU.

Application forms can be requested from the JFVU. Please ensure you have the latest version of the application form before submitting to the JFVU. All applications must be sent to the JFVU via email and hard copy versions will not be accepted.

- 3.2 All gifts, gratuity and hospitality applications require rationale from the applicant, detailing why they believe the gift, gratuity or hospitality should be accepted or refused. Applications also require support from the applicant's line manager. Line managers are required to review the gift, gratuity or hospitality and provide rationale as to why it should be accepted or refused. Line managers must consider the points in **Appendix A: Gifts, Gratuities and Hospitality Authorising Principles for Line Managers** when making their decision.

Any application received without full rationale from the applicant and line manager will be not be accepted.

- 3.3 All gifts, gratuities and hospitality applications take up to 30 days to process and all decisions will be communicated to the applicant and line manager in writing.

4 **Decision Making**

- 4.1 Gifts, gratuities and hospitality decisions will be made in accordance with the National Decision Model ([NDM](#)).
- 4.2 Gifts, gratuities and hospitality decisions are made by the JFVU Supervisors and all decisions will be communicated in writing to the applicant. Line managers will also be advised of the decision.
The JFVU Supervisors will consider the appropriateness of the gift, gratuity or hospitality in relation to the circumstances to which it was received and whether it is considered reasonable in the eyes of the public.
- 4.3 Each case will be assessed on its own individual merits, taking all information into account. Where an application is granted the JFVU Supervisor will provide the applicant with written approval to accept the gift, gratuity or hospitality.

Where an application is rejected the JFVU Supervisor will provide the applicant and line manager with the decision in writing along with the reasons why it cannot be accepted. Individuals are required to return the gift, gratuity or hospitality offer to whoever gave it to them, if appropriate. Should the return of a gift, gratuity or hospitality not be appropriate, then it must be donated to one of the Chief Officer's charities.

5 Appeals

- 5.1 All applicants have the right to appeal the gifts, gratuities and hospitality decision. Appeals must be made in writing to the JFVU Manager within 14 days of being notified of the decision.
All appeals will be reviewed by the JFVU Manager. In some cases, it may be necessary to refer an appeal to the Head of PSD or their appropriate deputy for the respective Force. In these cases, the Head of PSD or appropriate deputy will review the gift, gratuity and hospitality, along with any associated rationale for decisions. They may also consult with any relevant staff networks, Police Federation or UNISON if required, to gather information for the final decision.
- 5.2 The final decision will be given to the applicant in writing within 21 days of receipt of the notice of appeal. After this, there is no further right of appeal. At all stages of the appeals procedure the applicant may be represented by Police Federation or UNISON (if a member).

6 Recording

- 6.1 All gifts, gratuities and hospitality are recorded on the vetting management database Core-vet, and maintained by the JFVU. An extract of the database will be published on the Forces websites to provide transparency and to promote public confidence.
The application, supporting documents and associated correspondence will be stored for monitoring purposes, and for the resolution of disputes. The content of the database will be available to both the Forces for lawful business purposes and for organisational management purposes.

7 Statistical Reporting

- 7.1 The JFVU report gifts, gratuities and hospitality information and statistics to

the Office of Police and Crime Commissioner and the Joint Audit Committee. Some department heads request reports for their business area, which is provided. The information is used for transparency to improve public confidence in the police service and for audit purposes.

Any information or statistics used are anonymised for data protection purposes and any confidential information will not be disclosed.

8 Reporting Suspected Breaches

- 8.1 It is the responsibility of everyone to report any concerns about gifts, gratuities and hospitality either through their line manager or by direct contact with the JFVU or PSD. Individuals are encouraged to report overtly to PSD where possible. Individuals must be supported by their line manager during this process.

Gifts, gratuities and hospitality concerns can also be reported via the PSD's anonymous reporting systems which can be found by clicking on the relevant link below:-

Surrey: [Anonymous reporting](#)

Sussex: [Break the silence - Anonymous reporting](#)

- 8.2 The JFVU and PSD investigations are responsible for investigating suspected breaches of gifts, gratuities and hospitality. PSD Anti-Corruption Unit (ACU) take sole responsibility for the deployment of covert tactics focused against subjects, including Individual's that are believed to be in breach of this policy.
- 8.3 Divisions and departments must not, under any circumstances, attempt to deploy any covert tactics against any subjects, including police officers, Special Constables and police staff, who pose a threat to the Forces through corruption, without the involvement of the PSD ACU.

9 Information Management

- 9.1 Details relating to the nature of the gift and the donor will be retained for a period of seven years.
- 9.2 Information Management and Security is everyone's personal responsibility. Vetting Staff must ensure they act with the highest integrity when managing personal information and sensitive issues.
- 9.3 Vetting Staff must ensure their use of the Force's information or information systems is accessed for a legitimate policing purposes and where such activity supports the goals and objectives of the JFVU.
- 9.4 Personal browsing of the Force's systems or information is not permitted under any circumstance. Anyone found to be accessing Force systems or information without a lawful purpose may be subject of disciplinary proceedings.
- 9.5 Vetting Staff must ensure that all hard copy documents containing personal information are stored securely and locked away when not in use. They must also ensure that personal information is disposed of in the correct way, to

prevent accidental disclosure of information or unnecessary retention of material.

Please refer to the [Information Management Policy \(Surrey and Sussex\) \(1187\)](#) for further guidance.

PCC/OPCC Gifts and Hospitality Register March 2022

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
DPCC	High Sheriff of Surrey	02/03/2022	Refreshments/Lunch	Egham	Accepted	High Sheriff's Summit on School Exclusion	5.00	Policy Lead for Community Safety also attended
PCC and DPCC	Forensic Analytics	03/03/2022	Lunch	Epsom	Accepted	Lunch meeting to discuss how Forensic Analytics could offer their services to OPCC/Surrey Police	35.00	Cost per person
DPCC	Take the Reins/Lingfield Park Racecourse	04/03/2022	Lunch	Lingfield	Accepted	All day meeting to learn more about the Take the Reins project	30.00	
DPCC	Surrey County Council	15/03/2022	Lunch	Pirbright	Accepted	Surrey Armed Forces Covenant Conference	10.00	
DPCC	High Sheriff of Surrey	16/03/2022	Refreshments	Guildford	Accepted	High Sheriff Youth Awards Annual Celebration	10.00	Cost per person. DPCC's partner also attended.
DPCC	Surrey County Council	18/03/2022	Buffet lunch	Walton	Accepted	SFRS Youth Engagement Scheme Graduation	5.00	
DPCC	High Sheriff of Surrey	24/03/2022	Refreshments	Guildford	Accepted	Installation of the High Sheriff of Surrey 2022/23	10.00	Cost per person. DPCC's partner also attended.
DPCC	Woking Borough Council	25/03/2022	Refreshments	Woking	Accepted	VIP Day for Woking Junior Citizen	5.00	

PCC/OPCC Gifts and Hospitality Register January 2022

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
None Received								

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
DPCC Ellie Vesey-Thompson	RMA Sandhurst	08/12/2021	Lunch/Refreshments	Sandhurst	Accepted	RMA Sandhurst's Commandant Parade	£20.00	

PCC/OPCC Gifts and Hospitality Register November 2021

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
Lisa Townsend	Broadmoor Hospital	09/11/2021	Sandwich lunch as part of a wider meeting and tour	Broadmoor Hospital	Accepted	To see mental health hospital in line with APCC responsibility	10.00	
Lisa Townsend	Surrey County Council	17/11/2021	Refreshments	SCC HQ Woodhatch	Accepted	Safe Drive Stay Alive VIP event	5.00	
Lisa Townsend	Police Superintendents Assoc	23/11/2021	Dinner	Lingfield Race Course	Accepted	Invited as a special guest to Police Supts Association District Meeting	£25.00	

PCC/OPCC Gifts and Hospitality Register October 2021

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
PCC Lisa Townsend	Ah! Media UK	12/13 October 2021	Complimentary tickets to Police Strategy Forum including on-site accommodation, all meals and refreshments, networking dinner, access to seminars)	Gloucestershire	Accepted	Police Strategy Forum	995.00	DPCC also attended on complimentary ticket
PCC Lisa Townsend	Guildford Crown Court	26/10/2021	Lunch with Judges	Guildford Crown Court	Accepted	to have oversight of Crown Court	15.00	
DPCC Ellie Vesey-Thompson	Lord Lieutenant/SERFCA	21/10/2021	Refreshments	Dorking	Accepted	Lord Lieutenant's Surrey Awards 2021	20.00	

PCC/OPCC Gifts and Hospitality Register September 2021

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
PCC Lisa Townsend	Jonathan Lord MP	23/09/2021	Refreshments	Woking	Accepted	Invited to Jonathan Lord MP's Blue Ribbon Club Evening	£10	DPCC also attended
PCC Lisa Townsend	North East Feminist Collective	01/09/2021	Bouquet of flowers, mug, fridge magnet, keyring	NA	Accepted	Gift to PCC following Mail on Sunday newspaper article	£50	

PCC/OPCC Gifts and Hospitality Register August 2021

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
None received								

PCC/OPCC Gifts and Hospitality Register July 2021

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Approximate Value (£)	Additional Comments
PCC Lisa Townsend	High Sheriff of Surrey	02/07/2021	Lunch and refreshments	Egham	Accepted	Invited to High Sheriff Summit meeting on Inclusion	£5	DPCC also attended
PCC Lisa Townsend	High Sheriff of Surrey	06/07/2021	Refreshments	Guildford	Accepted	Invited to Service for the Judiciary	£10	DPCC also attended
PCC Lisa Townsend	Surrey Police Band	20/07/2021	Concert tickets	Guildford	Accepted	Invited to Surrey Police Band Concert - complimentary tickets	Unknown	DPCC also attended

PCC/OPCC Gifts and Hospitality Register June 2021

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
PCC Lisa Townsend	Mole Valley DC	26/06/2021	BBQ	Ashtead	Accepted	Invited to attend launch of Mole Valley Veterans' Hub as part of Armed Forces Day 2021	£5	DPCC (nominated) Ellie Vesey-Thompson also attended

PCC/OPCC Gifts and Hospitality Register May 2021

Name of Recipient	Name of Provider	Date Gift/Hospitality Received	Details of Gift/Hospitality	Location	Accepted/ Declined	Justification for Acceptance/ Refusal	Value (£)	Additional Comments
None received								