

Gifts and Hospitality Policy

Policy Owner	Chief Executive
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Security Classification	Official
Disclosable under Freedom of Information Act?	Yes
Risk Rating	Low
Equality Analysis	Low

The Office of the Police and Crime Commissioner welcomes comments and suggestions from the public and staff about the contents and implementation of this policy. Please e-mail opcc@warwickshire.police.uk

1. Introduction

This policy aims to increase public confidence by providing the Police and Crime Commissioner (PCC) and Office of the PCC (OPCC) staff with a framework to determine the boundaries of acceptability regarding the receipt of gifts and hospitality.

This policy sets out an approach to the acceptance of gifts, gratuities and hospitality. The policy is applicable to the Police and Crime Commissioner, Deputy PCC, and all those who work within the Office of the Police and Crime Commissioner, as a staff member or a contractor or volunteer.

2. Principles

The PCC and OPCC staff should demonstrate the highest standards of professional behaviour, honesty and integrity, as well as comply with the Nolan Principles and the Code of Conduct at all times. You must not abuse your position for personal advantage and should always carefully consider the motivation of the person offering a gift, gratuity or hospitality and the risk of becoming improperly beholden to them or an organisation. You should also consider the reputational impact of any decision to accept a gift or hospitality. All applicable acceptances must be recorded in the register, and in respect of the PCC, Deputy PCC and other Statutory Officers should also be published on the website.

Whilst acceptance might seem a minor show of gratitude, there may be an impact, which could affect the reputation of the Police and Crime Commissioner or his office. The principles apply to each offer of a gift or hospitality received on a personal basis, and some examples are outlined below to enable decision making. If in doubt you should discuss with your line manager, and ultimately the Chief Executive, whether you should accept a gift or hospitality.

The Chief Executive will have final determination of whether a staff member should accept a gift, and will provide advice to the PCC and Deputy PCC accordingly. In respect of gifts or hospitality given to the Chief Executive herself, the Chief Finance Officer will make the determination.

OPCC staff are also governed by a disciplinary procedure. Any act that goes against the principles set out in this policy and that may discredit the OPCC may amount to gross misconduct, under the disciplinary policy in place.

3. Whether to accept the offer

The following questions should be considered when deciding whether an offer should be accepted:

- Genuine – Has the offer been made because somebody genuinely appreciated something I have done, without any encouragement from me?

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- Independent – If I accept the gift, would a reasonable bystander be confident that I could continue to do my job without undue influence?
- Free – Could I always feel free of any obligation to do something in return for the donor?
- Transparent – Would I be comfortable if the gift was transparent to my organisation, its clients and to the public?

3.2 Gifts

Some examples of gifts which may be accepted include:

- from an individual, community or organisation in recognition of an individual or organisational service (e.g. a box of chocolates, a framed picture). Such gifts will normally be shared or displayed on OPCC premises and not retained by individuals. These items will be recorded.
- gifts from overseas governments or organisations (e.g. plaques, shields, commemorative items). These items will be recorded.
- of a trivial or inexpensive nature, for example, diaries, calendars, pens, stationery, key rings, or other small gifts offered during a courtesy visit. These items will not be recorded.
- insignificant marketing or refreshment items freely available to all persons attending a conference, exhibition, seminar or other event (e.g. pens, key rings, coasters, etc.). The acceptance of such items will be a matter for the personal discretion of the individual concerned. These items need not be recorded.

Gifts which should not be accepted include:

- those from outside contractors or companies tendering for work, unless of a trivial or inexpensive nature as described above;
- cash payments other than as a donation to a specific police charity;
- those likely to compromise an individual's impartiality, or may give the impression of doing so;
- those likely to damage the image and/or reputation of the OPCC;
- offered frequently from the same source, irrespective of value unless approved by the Chief Executive specifically
- financial rewards resulting from the publication of articles or delivery of speeches or presentations related to an individual's role within the organisation – eg at a conference or seminar.

These lists serve as examples only, and are therefore not exhaustive.

3.3 Hospitality

It is a usual part of business to be offered and to accept light refreshments as part of attendance at meetings and events. This may extend to a meal if the event warrants

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it. This sort of hospitality does not need to be declared. A meal or other consumable hospitality which is in addition to the usual refreshments, should be declared. This could be a meal at an event, conference or after a meeting, which has a cost~~s~~ attached which is covered by others. This also includes meals or drinks in restaurants. These should be recorded on the form.

An invitation to a sporting or social event (other than on official duties), offers of free travel and/or accommodation, and invitations to conferences or other events in foreign locations must be agreed in advance and declared, and every instance should be reviewed to ensure that it fits within the principles outlined. Such activity will almost always need to be recorded.

There can be no individual gain when purchasing items or fuel for work purposes. Advantages such as point schemes/air miles etc. cannot be collected under these circumstances.

4. Recording and reporting

All gifts and hospitality received should be recorded on the register. The register will be reviewed by the Chief Executive to ensure that appropriate decisions have been made.

Should the Chief Executive determine that the gifts or hospitality should not have been accepted, or a record is missing from the register, she will deal with the matter with regard to the severity of the impact, with respect of the Nolan Principles, keeping a record of action taken. The misconduct policy will be used as required. Where it is determined that a gift should not have been accepted the recipient will be responsible for returning it. Where this is not practical or possible, consideration will be given to charity donation.

Every quarter the website should be updated to show the Gifts and Hospitality received by the PCC, Deputy PCC, Chief Executive and Chief Finance Officer.

5. Equality Statement

The Police and Crime Commissioner is committed to the principles of equality and diversity. No member of the public, member of staff, secondee, contractor, volunteer or job applicant shall be discriminated against on the grounds of age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; or sexual orientation. If you need some help to understand or take action in respect of this policy please contact an appropriate person within the OPCC.

This policy has been assessed against the PCC's Equality Statement and objectives and determined to be unlikely to disproportionately affect someone with a protected characteristic.

6. Revision Record

Date of change	Nature of revision
4 January 2023	Review and update from 2015 version