

Witness: Lynne Owens  
Statement No: 1  
Exhibits Referred to: LO/1, LO/2, LO/3, LO/4, LO/5, LO/6,  
LO/7, LO/8, LO/9, LO/10  
Date Statement Made: 26 January 2012

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**The Leveson Inquiry into the Culture Practices and Ethics of the Press**

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This is the exhibit marked 'LO/10' referred to in the statement of Lynne Owens, dated this 26<sup>th</sup> day of January 2012.

**Title: Hospitality, Gifts and Declarations of Interest**

**Governing Policy : Anti Fraud and Anti Corruption Policy**

**Aim : The aim of this document is to outline the procedure for receiving hospitality, gifts and discounts, in addition to declarations of interest.**

**Text**

To use the authority of office to obtain or gain a personal advantage is unethical and, in certain circumstances, a criminal offence. No member of staff will produce a warrant card or civilian identity card, or wear whole or part uniform, to obtain discounts, goods or services unless as part of an approved arrangement.

There is a clear distinction between a gift, which may create 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. 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. This also applies to offers in respect of a particular group of officers, such as a geographically based team, those who work in the same office, and those who share the same shift pattern.

If presented with a gift, which it would be discourteous to refuse, it should be accepted and the hospitality, gifts and declaration of interest pro forma submitted to the intended recipient's line manager including consideration of the following points;

- What is the motivation behind the offer?
- What is the value and significance of the gift being offered?
- What are the background circumstances?
- Who is the donor?
- Does the donor feel obliged to make the offer?
- What does the donor expect in return?
- What could be the public perception or reputational impact of accepting the offer?

The donor should be advised that permission to retain the gift will be sought and that they will be advised of the outcome.

If the value of gift is less than £50 then it may be authorised by the line manager. If considered in excess of this amount the line manager will review and seek further advice/guidance from the Head of PSD

Promotional items of insignificant value, such as calendars and pens, may be accepted and need not be included on the register.

Staff must not accept personal gifts of money 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 donations to the Force, or as part of the responsibilities of their role. Where an offer of a gift of cash is made it will be declined and reported immediately to a supervisor or manager.

### Hospitality

Where an offer of hospitality is made by a member of the public, contractor/supplier or an external body i.e. such as a meal or attendance at a function and it is considered to be in the interest of the Force to attend, the hospitality, gifts and declaration of interest pro forma must be submitted to the line manager. The line manager will review and either authorise, refuse authorisation or seek further advice/guidance from the Head of PSD.

This is to protect staff from any subsequent suggestion of impropriety. Before accepting such an offer the following should be considered:

- Is attendance at the function part of a duty fulfilment, such as furthering community relations, and is the work element significant (i.e. a presentation or panel discussion)?
- Is it for charity? If so, attendance should not be free unless the recipient is invited as a valued dignitary (part of the attraction).
- Is it mainly for pleasure? In this case attendance should never be free.
- What would be the public perception or reputational impact of accepting the offer?

Occasions may arise when a member of the force is invited to a function where a "donation" or fee is expected from attendees. If the invitation is:

1. As a representative of Surrey Police and not in a personal capacity;

and,

2. It is considered that an attendance is justified in the interests of the organisation; the associated fee may be reclaimed as an expense in the normal way, subject to budget holder approval.

In all instances, any documentation and/or a hospitality, gifts and declarations of interest pro forma relating to the acceptance of hospitality, gratuity or declarations of interest, **whether authorised or not**, must be forwarded to the Head of PSD for recording on the Force Register.

Members of Chief Officer Group will obtain authority from their line manager with the exception of the Chief Constable, who will obtain approval from the Police Authority. Pro formas to be completed and forwarded to the Head of PSD for recording on the Force Register.

This will provide a source of reference for those asked to authorise the applications and will contribute towards similar offers being treated in the same way across the force.

Some members of the public may offer to make a contribution towards Police

Charities instead of making a gift to a particular officer or group of officers. In this case, based on a similar approach to that above, offers will be politely declined in the following circumstances:

- Where there is an obvious ulterior or dishonest motive.
- Where it would place the police in a difficult position, e.g. donation from a political party or lobby group.
- Where it would arouse suspicion of attempting to influence the police.
- If the donor is of doubtful character or unsound mind.

#### Uniform and Equipment as Gifts

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. Police Staff and Officers could make themselves liable to disciplinary proceedings if 'sensitive' items are given, however well intentioned.

For the list of 'sensitive' items, please refer to the Uniform Reference Page.

#### **Declaration of Interest**

The Chief Constable has a duty to protect the interests and integrity of the force by ensuring that approved business interests for police officers and staff are not likely to discredit the police service. All officers and staff should disclose their involvement in a business interest or secondary employment.  
(See Business and secondary employment procedure)

There may be occasions when officers or staff may not be initially aware of this interest, under the Local Government Act 1972, they must declare in writing any pecuniary interest (direct or indirect) that an Officer has or becomes aware of in respect of a Contract placed by his/her Authority.

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:-

- declare that interest immediately to their line manager by completing a hospitality, gifts and declaration of interest pro forma
- Immediately remove him/herself from the Process

Such Interests will be construed as (but not limited to):-

- Any employee who is also employed (full or part time) by any of the other parties to the Contract
- Any employee who is a director, partner or substantial shareholder of or has a financial interest in any of the other parties to the Contract
- Any employee who has family members who are owners, employees or have another substantial interest in any of the other parties to the Contract

#### **Register monitoring and feedback**

A single register will be maintained centrally on the Force intranet, which will record separately details of gifts and hospitality received. A sanitised version will be available on the public website.

The register will be audited by the DCC via the Portfolio meeting

The register will be subject of a quarterly dip check by the Audit Committee of the Police Authority to ensure that the type and level of gifts and hospitality being received are appropriate.

Entries relating to Chief Officer Group will be formally reported to the Committee by the Head of PSD on a quarterly basis.

**Note:** If an individual is unsure whether something constitutes a gift or gratuity they should discuss it with the Head of Professional Standards.

### Monitoring

Document reviewed annually

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**Approved By :** DCC

(Command/Dept  
Head)

**Department :** Professional Standards Department

**Author :** Head of PSD

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**See Also :** [Anti Fraud and anti corruption Policy](#)  
[Hospitality, Gifts and Declaration of Interest Pro-forma](#)  
[Flow Chart for Hospitality and Gifts](#)

**Document**  
**Classification :** Not Protectively Marked

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