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With compliments of
THE CHIEF CONSTABLE

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The attached is an early draft of force policy. This is currently being considered by other departments and business areas as part of the consultation process.

Regards



Serving our communities, protecting them from harm

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West Midlands Police



PART 1 POLICE ORDERS

Police Headquarters
Lloyd House

FORCE DIRECTIVE

NO. /2012

January 2012

GIFTS AND HOSPITALITY

All members of the public and communities we serve, all police officers, special constables and police staff members shall receive equal and fair treatment regardless of, age, disability, gender, race, religion, belief or sexual orientation. If you consider this policy could be improved for any of these groups please raise with the author of the policy without delay.

Any enquiries in relation to this Order should be directed to Steve Middleditch, Head of Corporate Services on extension 7800 2456 or the Head of Professional Standards Department.

1. INTRODUCTION.

- 1.1 Maintaining the integrity of the force and demonstrating transparency and accountability to the public we serve is essential to retain public confidence. The acceptance, refusal or provision of gifts and hospitality are issues that require careful consideration by all police officers, police staff and Police Community Support Officers (PCSOs).
- 1.2 When participating in normal working relationships, whether between the force and other organisations or between individuals, it is recognised that hospitality and reciprocation may, in some circumstances, be acceptable and that it can present the force in a positive way. The monetary value or perceived monetary value of the hospitality and the circumstances in which it is offered, form the essence of what is acceptable. This order sets a framework within which all West Midlands Police officers, staff and PCSOs may consider individual instances, seek advice, approval and the recording arrangements.
- 1.3 A modest degree of hospitality may be welcomed by partners in public service and displays cordiality that can assist working relationships. A responsible approach to this area and the correct degree of control will ensure this traditional means of greeting and appreciation remains a benefit to the force.

2. GUIDANCE.

- 2.1 The circumstances for either accepting or receiving gifts and hospitality are strictly limited in order to maintain public confidence. This applies to all police officers, staff and PCSOs. In all cases, permission should be sought from a line manager and recorded in a central register (see section 3).

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Visits to or by, and meetings or contact with, suppliers or potential suppliers should be for reasoned and justifiable purposes and duly authorised by managers or supervisors and recorded. Similarly, contact with the media involving socialising, gifts or hospitality should be documented in accordance with this policy. Contact with suppliers or potential suppliers involved in private sector partnering or persons acting on their behalf should be referred to the PSP Project Team at Lloyd House for prior approval.

- 2.2 The term 'gift' should be taken to mean items of a token value such as desk top items and diaries. It may be that a gift of a higher value is offered; this may be due to cultural or traditional reasons and accepting such a gift may be acceptable. In cases of doubt, advice should be sought from line management. Where circumstances do not justify acceptance, the gift should be politely refused. Where gifts and hospitality are offered by a contractor or supplier, known to be or likely to be on any list of tenderers or contractors, they must not be accepted..
- 2.3 This guidance relates to police officers, police staff and PCSOs in their employment within West Midlands Police who are expected to maintain the highest level of integrity at all times and to act in accordance with force values:
- We put the public first in everything we do
 - We act with integrity, fairness and humanity
 - We are one team working together
 - We listen, learn and strive to improve
- 2.4 In general, hospitality is defined as provision of refreshments including drinks and/or food and should be employed in welcoming visitors and in expressing our appreciation of their visit. It may be engaged when participating in customary exchanges between organisations and individuals and in recognising support and contributions to our work.
- 2.5 Hospitality and gifts received should be recorded at LPU or departmental level and hospitality or expenditure given (other than official meetings/ceremonies etc) are recorded via the i-Procurement purchasing system using the appropriate cost code available.
- 2.6 Providing a comprehensive list or summary of what is and is not acceptable is not practical and leaves too great an area subject to interpretation. However, the following are examples of items that are unlikely to be acceptable: cash, alcohol, lavish food or entertainment, eg private boxes at sporting events, loan of vehicles, free travel, free entertainment, free trials of unauthorised uniform, expensive goods, accommodation, invitations to private or exclusive social events and trade shows, exhibitions, supplier or potential supplier visits without due cause or authorisation. Regular but small gifts of refreshment may be unacceptable, especially if from a particular donor. What the public might think, should also be a guide.

Police officers, staff and PCSOs should act with professional judgement, using force values and line managers as a guide. In all cases, consideration as to what is proper and what may be seen to be proper should be given. However, certain events and products should be avoided especially where there is no tangible policing or community link or benefit and where embarrassment or reputational damage to the force could be caused.

3. OFFICIAL RECORDING and AUTHORITY REQUIRED

- 3.1 Appropriate gifts and hospitality up to the value of £25 may be accepted and given and will be recorded via form WG450 which will inform LPU/departmental line manager for local audit recording and examination.

Offers of gifts and hospitality that are refused will also be recorded as above.

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- 3.2 The acceptance (or refusal) of gifts or hospitality between £25 and up to £250 must be authorised by (or reported to) the LPU Commander or Department Head. Where the gift or hospitality involves the LPU Commander or Department head, this should be referred to the Director of Resources or Head of Professional Standards.
 - 3.3 Gifts or hospitality given or received that exceed £250 in value must be authorised by the Director of Resources. Where such gifts or hospitality are refused, this will also be recorded as above.
 - 3.4 The issue of aggregation should be monitored by managers and supervisors. That is, the number of and the value of gifts or hospitality of any value received, refused or given where any one individual or outside body is involved.
 - 3.5 All gifts or hospitality, received, given or refused, should be submitted, by e-mail, to **(insert new e-mail address)** attaching form WG450 via the standards forms page of the intranet.
 - 3.6 LPUs and departments will maintain local registers (form WG450) which will be forwarded at the end of each month to Corporate Services Department who will maintain the force register. This will include nil returns will be recorded as certification that no gifts or hospitality have been given or received. This register will be used to monitor events and trends and is subject to public disclosure.
- 4. CONSEQUENCES.**
- 4.1 Strict anti-corruption legislation exists to ensure the highest standards of conduct and probity are maintained by public servants. Breaches, particularly regarding suppliers, tenders and contracts can result in criminal offences being committed. Questions are asked by the media and the public regarding the levels/value of gifts and hospitality, either given or received. The force is bound, under the Freedom of Information Act, to publish that information. Inappropriate acceptance of or giving of gifts and hospitality can cause embarrassment and reputational risk to the force and to the individual.

Draft for consultation and approval

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