

# GIFTS, GRATUITIES & HOSPITALITY

## Executive Summary

All forms of police corruption are damaging. Corruption undermines investigations, prosecutions, endangers members of the service and impacts on the trust and confidence that our communities have in the West Midlands Police (WMP).

WMP expects and demands the highest levels of honesty and integrity from all police officers and staff, whether on or off duty. It is of fundamental importance that our communities have confidence in our ability to discharge our functions with fairness and impartiality.

As such, the acceptance or provision of gifts, gratuities and hospitality are likely to have an adverse impact on the integrity of individuals and the effectiveness and reputation of the organisation.

WMP recognises that the vast majority of officers and staff behave with honesty and integrity and the acceptance or provision of gifts, gratuities or hospitality, in appropriate circumstances should not be considered detrimental. However, there are occasions when circumstances make the acceptance or provision of gifts, gratuities or hospitality inappropriate.

**The policy has been written in accordance with NPCC Guidance *on gifts, gratuities and hospitality*, which provides an ethical framework to determine the boundaries of acceptability. West Midlands Police accepts and endorses this guidance, which forms part of this policy.**

**The NPCC guidance should be used by all officers and staff in their decision making when offered gifts, gratuities or hospitality (attached at Appendix A).**

The aims of this policy are to:

- a. Protect WMP from corruption and allegations of corruption;
- b. Increase public confidence in WMP; and
- c. Provide an ethical framework of guidance to members of WMP in relation to gifts, gratuities and hospitality.

## Authorised Professional Practice (APP):

- This policy has been checked against APP and there is none in relation to the subject matter of this policy.

## Policy Statements:

- This policy applies to all WMP officers, staff, PCSOs, special constables and volunteers, both on and off duty.
- This policy continues to apply where employees/volunteers are on secondment or acting in their capacity as representatives of the Police Federation, Trade Unions, Staff Associations and Support Associations.
- All offers of gifts, gratuity and hospitality must be declared and recorded in line with this policy, irrespective of whether or not it is accepted or rejected by the recipient (\*unless an exemption applies).
- Acceptance of gifts, gratuities and hospitality must be approved by a relevant senior officer/staff member (\*see authorisation levels below).



- Cash or monetary gifts must not be accepted, unless they are directed to specific police charities or police supported charities

**EXEMPTIONS**

- Impromptu provision of light refreshments as a common courtesy in line with policing duties (eg. tea, coffee, biscuits)
- Working lunches of a modest standard during police-related business meetings (without alcoholic drinks),
- Inexpensive promotional products from partnerships or conferences
- Discounts aimed at all members of the wider police service.

**AUTHORISATION LEVELS**

Recipient	Decision Maker	Register
Officer/Staff/PCSO/Special Constable/Volunteers	NPU/Department Appropriate Authority	Notification, endorsement, decision and course of action recorded on NPU/Dept register
NPU/Department SLT	Force Executive Team	Notification, endorsement, decision and course of action recorded on NPU/Dept register
Force Executive Team (excluding Chief Constable)	Chief Constable	Notification, endorsement, decision and course of action recorded on Command Team register
Chief Constable	Police & Crime Commissioner (PCC)	Notification, endorsement, decision and course of action recorded on Command Team register

- It is acknowledged that some staff on secondment or working in their capacity as Federation, Staff or Union representative may not have a Head of Department to whom they may report. You must therefore report to the most appropriate line manager within WMP.

**MINIMUM REPORTING REQUIREMENTS**

- Nature of the offer
- Surrounding circumstances in which the offer was made
- Estimated value of the gift, gratuity or hospitality
- Whether permission to accept any such offer was sought or granted

**RECORDING, COMPLIANCE AND MONITORING**

- PSD will maintain the force register of gifts, gratuity and hospitality under the direction of the Head of Professional Standards.



- Periodic scrutiny and auditing of the register will be completed in line with wider governance arrangements for integrity and counter corruption.
- The gifts, gratuity and hospitality register will be published annually in line with the Freedom of Information Publication Scheme.

## MISCONDUCT

- Failure to report gifts, gratuities and hospitality (whether accepted or refused) or a failure to comply with this policy may be a breach of the Standards of Professional Behaviour.
- Where a breach of the Standards of Professional Behaviour is identified, the officer/staff member may be referred to the relevant misconduct proceedings.

### Definitions/Acronyms:

**Gift:** is defined as any 'item, cash, goods or service which is offered for personal benefit at no cost, or at a cost that is less than its commercial value'.

**Gratuity:** is defined as 'a gift of money'.

**Hospitality:** is defined as 'any generous or material welcome or reception that is more than incidental, i.e. more than a beverage or light refreshment, and includes the offer of any free meals, excursions, flights or accommodation'.

WMP – West Midlands Police

NPU – Neighbourhood Policing Unit

PSD – Professional Standards Department

### Procedural Guidance Documents List:

#### Reporting & Recording Process

### Publication Instructions:

- Suitable for publication to public

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**Policy Author:** Insp Jonathan Beach, PSD

*Any enquiries in relation to this policy should be made directly with the policy author shown above.*



**Force Executive Approval:**

*David Thompson*

**CHIEF CONSTABLE**

**Monitoring and Review**

Version	Date Reviewed	No change / Minor Changes / Major Changes ( <i>detail</i> )	Amended / Agreed by