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## **Hospitality and Gifts Policy**

[Originally inserted by 'Policy Guideline' P68/99 and updated by P80/06]

This 'Policy Guideline' reviews and updates the current policy, procedure and protocols to be followed by all members of staff considering receipt/provision of hospitality or gifts. The guidance is designed to:

- ◆ Prevent any improper inference(s) being drawn from innocent activity such as attendance at conferences/events.
- ◆ Provide a framework whereby devolved hospitality budgets can be used appropriately.
- ◆ Present Essex Police in a positive light as a good host.

The Police Regulations 2003 and the Police (Conduct) Regulations 2004 still apply and are unaffected by this policy - see below.

'Hospitality' includes receiving gifts or gratuities in any form, giving material or passive support by attending or participating in an event (including sporting functions) where the clear inference to be drawn is one of representing Essex Police in an official capacity. It does not include participation in recognised and approved Force Sport or activity undertaken in a private off-duty capacity where no official link with Essex Police can be drawn or inferred. Tea, coffee, biscuits, sandwiches, cakes and other light refreshments provided at meetings are not included in this policy.

Not only should staff act beyond reproach but they should be seen to do so. A guiding principle is that no officer or staff of Essex Police should put themselves in a position that might be construed with suspicion.

### **Acceptance of Hospitality**

Members of Essex Police may only accept hospitality in order to:

- ◆ Participate in seminars, presentations and similar functions to further relations with public and private bodies or individuals to gain support for the policing effort.
- ◆ Further community relations.
- ◆ Extend the educational and marketing aspects of policing.
- ◆ Acknowledge achievement in various aspects of policing, civic duty, bravery, or charity work.

Offers of hospitality must be considered carefully before acceptance to ensure no improper inference can be drawn. Staff should be particularly sensitive to the timing of hospitality in relation to decisions which the Force or Police Authority may be taking that affect those providing the hospitality, e.g., a potential contractor.

Invitations to attend purely social or sporting functions, at the cost of a private sector host, should be politely refused. Such invitations can only be accepted when Essex Police is required to be formally represented or it is in the interests of Essex Police to attend such a function as a member of a wider partner group.

When hospitality is declined, this should be done courteously by informing those making the offer of the procedures and standards operating within Essex Police.

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Approval to attend any event that might be construed as 'hospitality' must be submitted in advance to the Divisional/Departmental Commander or Project Board Chairperson as appropriate. In cases where the hospitality is extended to them, and there is doubt as to whether it is covered under this policy, then the authorisation rests with a Chief Officer. Chief Officers, when offered hospitality, should have another Chief Officer verify there is no potential compromise in accepting the offer. All staff and officers of Essex Police are required to complete hospitality registers.

It is suggested that the most practical way of administering this would be for each Divisional/Departmental Commander to give some form of blanket authority, particularly to the functions of the Division/Department which, subject to records being kept, would not require authorisation on each individual occasion.

From time to time, occasions will arise when the benefits or hospitality offered will not fall clearly into any of the circumstances described in this policy. If in doubt, Police Staff and Police Officers alike should refuse the gift or hospitality and inform their line manager in writing.

### **Providing Hospitality**

Hospitality may be offered, within devolved limitations, to parties or persons from outside Essex Police where there is a clear potential benefit or reasonable expectation for such hospitality to be provided.

It would not be expected to routinely provide hospitality to members of staff from other forces who are able to claim subsistence or expenses. The exception would be cases where different forces or organisations took it in turn to host a particular meeting, and to provide hospitality on a reciprocal basis.

Divisional/Departmental Commanders are accountable for devolved budgets which will be subject of monitoring and audit. Virement between budget heads is the responsibility of the budget holder within Financial Regulations.

Hospitality will not normally be given for internal meetings or events except where the time allotted for lunch has to be flexible. An exception to this would be in the case of a 'planning' or 'teambuilding' day for example. If a Division, Department or Section is called together for such an occasion, hospitality may be provided, particularly if it would prove more cost effective than paying a number of subsistence claims.

Where a company or organisation is engaged in an authorised project with Essex Police, and meetings are held at alternative venues, it is acceptable to reciprocate appropriate refreshment.

One of the purposes of this policy is to avoid staff personally incurring expenditure in hosting guests. It will be normal, therefore, for the number of guests to be equal to, or in excess of, the numbers of Essex Police members of staff present.

### **Corporate Hospitality**

It is acknowledged certain events transcend Divisional boundaries or specific Departmental responsibility. Divisional/Departmental Commanders may seek, through advanced submission of Catering Form 7 to the Head of Administrative Services (who manages this

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budget on behalf of the Director of Finance & Administration (DFA)), allocation of funds from this budget head.

The Head of Corporate Support will retain responsibility for administration of the Corporate Meetings budget which will be addressed in consultation with Chief Officers and subject to audit.

### **Acceptance of Gifts, Legacies and Bequests**

Members of staff are *not* permitted (as the result of the provisions of any service administered by the Police Authority) to receive any legacy or bequest from, or on behalf of, any person with whom they come into contact in the course of their duties or work with the Police Authority.

Personal gifts or services should not be accepted from any contractor, supplier or any company/individual who may be seeking benefit from Essex Police, e.g., those who are on or likely to be on a tender or contract list.

There are limited exceptions when a gift may be accepted:

- ◆ Modest gifts of minimal value and promotional nature given to a number of people and not solely to one individual, e.g., pens, diaries.
- ◆ Small gifts where refusal may cause offence and where the giver is not seeking business from Essex Police but wishes to express thanks for advice, help or co-operation received. However, *under no circumstances* will this include money.

All gifts, other than token items (as outlined above) *must* be reported to the Divisional/Departmental Commander or Line Manager.

### **Police Officers**

The Police (Conduct) Regulations 2004 (Regulation 3 and Schedule 1) in the Code of Conduct state:

#### *Honesty and integrity*

It is of paramount importance that the public has faith in the honesty and integrity of police officers. Officers should therefore be open and truthful in their dealings; avoid being improperly beholden to any person or institution; and discharge their duties with integrity.

The Police Regulations 2003 (Regulation 6 and Schedule 1) state:

A member of a police force shall at all times abstain from any activity which is likely to interfere with the impartial discharge of his duties or which is likely to give rise to the impression amongst members of the public that it may so interfere; and in particular a member of a police force shall not take any active part in politics.

Accordingly police officers should not accept gifts, other than those of token value, unless the permission of the Divisional/Departmental Commander has been given. If in doubt the gift should be refused. If a gift, other than a token gift, is received or offered a report should be submitted detailing the person who gave or offered the gift, a description of the gift and the circumstances in which it was given or offered.

### **Sponsorship, Gifts and Loans (on behalf of Essex Police)**

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Where an outside organisation wishes to sponsor or is seeking to sponsor a Police activity, the basic conventions concerning acceptance of gifts apply. Further guidance can be obtained from the Head of Financial Services, Headquarters [📞 Ext. 50800].

### Records

For the protection of individuals, records should be kept locally of all accepted hospitality and gifts, other than token items. A Register, using revised Form A460, should be maintained by each Division/Department for audit purposes. Form A460, *which contains a copy of this 'Policy Guideline'*, records the date, the name of the recipient, the nature of the gift or hospitality and the donating organisation. The form is only available on the Intranet via the Force Forms Register from where it should be printed off for manual usage.

**'Policy Guideline' P68/99 of 11 March 1999 is cancelled.**

**For guidance in respect of Gifts, Loans and sponsorship connected to the Essex Police Sports Association [CLICK HERE](#).**

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