



British
Transport
Police

NOT PROTECTIVELY MARKED
BRITISH TRANSPORT POLICE

GIFTS AND HOSPITALITY STANDARD OPERATING PROCEDURE (SOP)

STANDARD OPERATING PROCEDURE			
REFERENCE.	SOP/219/10		
PROTECTIVE MARKING	NOT PROTECTIVELY MARKED		
PORTFOLIO	DEPUTY CHIEF CONSTABLE		
OWNER	Head of Professional Standards Department		
START DATE	12 October 2010		
REVIEW DATE	October 2013		
THIS POLICY REPLACES:	Guidance on the Giving and Acceptance of Gratuities- SOP ref D55133		
VERSION	DATE	REASON FOR AMENDMENT	AMENDED BY
1.3	19 July 2010	N/A	Sammia Ahmad Portfolio Support Policy Team
1.4	5 August 2010	Amendments	
1.5	20 August 2010	Final amendments	Sammia Ahmad Portfolio Support & Policy Team
1.6	26 October 2010	Change of owner	T/Insp Howson



NOT PROTECTIVELY MARKED
BRITISH TRANSPORT POLICE

CONTENTS

1	INTRODUCTION	3
2	BACKGROUND	3
3.	DEFINITIONS	3
4.	RESPONSIBILITIES	4
5	PROCEDURES	5
6	GIFT AND HOSPITALITY REGISTER	6
7.	HOSPITALITY	7
8.	DISCOUNTS	7
9.	ENTERTAINMENT	8
10.	MONITORING AND COMPLIANCE	9
11.	APPENDICES	9



NOT PROTECTIVELY MARKED
BRITISH TRANSPORT POLICE

GIFTS AND HOSPITALITY STANDARD OPERATING PROCEDURE (SOP)

1 INTRODUCTION

- 1.1 This procedure provides guidance for and applies to all British Transport Police (BTP) employees, except the Strategic Command Team (SCT), on the giving and acceptance of gratuities.
- 1.2 All gifts and hospitality accepted or declined by the SCT will continue to be recorded and managed by the Chief Constable's Executive Assistant (EA).
- 1.3 This procedure applies to England, Wales and Scotland commencing from August 2010.

2 BACKGROUND

- 2.1 During the course of their work, it is likely that BTP employees will receive offers of gifts and hospitality. This SOP is designed to protect the integrity of the BTP and ensure that employees are not compromised by the offering, acceptance or rejection of gratuities. It will enable individuals to work without the fear of accusations of corruption and dishonesty and will protect the reputation of the organisation.
- 2.2 The policy will also provide reassurance and confidence to the public and external stakeholders that high standards and expectations are in place for BTP employees when dealing with offers of gratuities and hospitality.

3 DEFINITIONS

- 3.1 Gratuities – can be defined as gifts, loans, hospitality or any other benefit. Throughout this SOP Gratuities will be referred to as Gifts and/or Hospitalities.
- 3.2 BTP employees – can be defined as Police Officers and Police Staff including the extended policing family and those working voluntarily or under contract to BTP.



NOT PROTECTIVELY MARKED
BRITISH TRANSPORT POLICE

4 RESPONSIBILITIES

- 4.1 Individual's responsibilities** - when a gift or hospitality (not falling under section 7.3) is offered any acceptance should be authorised by a line manager (wherever possible). Whether a gift or hospitality is accepted, declined or not authorised, the details in all cases must be passed to the individual's line manager (see Appendix A which is a process map for this and also Section 6.3 as to what details are required)
- 4.2 Line Manager's responsibilities** - are to assess whether it is appropriate to authorise the acceptance of a gift or hospitality (where it falls outside of section 7.3) offered to their member of staff. Whether it is accepted or declined the details must be noted on the Gifts and Hospitality Log (Template at Appendix B). This should then be submitted to the Area or Portfolio SPOC (please see Appendix C for each Area's or Portfolio's SPOC) as soon as practicable and within 28 days from receipt.
- 4.3 Area and Force Headquarters Department Single Point of Contact (SPOC)** – will collate and record information on the acceptance or declining of gifts by any member of their Department or Portfolio. The SPOC will also maintain a log of all Gifts and Hospitality received (see Appendix B) and ensure timely quarterly submissions to the Professional Standards Department (PSD) Intelligence Unit (IU) at Force Headquarters (FHQ), who will maintain the force register (See Appendix D). It is not necessary for each Department in each Area to have a SPOC.
- 4.4 PSD Intelligence Unit** – will hold responsibility for collating all the Area Gifts and Hospitality Logs received from FHQ Departments and Areas. These will be placed in the Gifts and Hospitality Register (See Appendix D) and submitted to the Command Support Group on a quarterly basis. They will also be responsible for taking reports of inappropriate receipts of gifts and hospitalities and dealing with them under unsatisfactory performance or the misconduct policy. Employees can notify PSD of any concerns they have over the receipt of gifts and hospitalities directly in writing to the Head of PSD or by email to the PSD Intel unit inbox or, through the confidential reporting network CARS, or the Crimestoppers Integrity Line.



NOT PROTECTIVELY MARKED
BRITISH TRANSPORT POLICE

4.5 Chief Constable's EA – will be responsible for the recording of accepted and declined gifts and hospitality of any member of SCT.

5 PROCEDURES

5.1 The Prevention of Corruption Act 1906 and the Prevention of Corruption Act 1916 outline situations where a criminal offence can be committed as a result of the acceptance of a gift. Subsequently, offers of gifts should normally be declined, except where there is a valid reason to believe that refusing the offer may damage community and working relationships.

5.2 BTP employees must ensure that:

- Any gifts and hospitalities accepted are justifiable and reasonable;
- The acceptance of gifts and hospitality do not amount to implications that BTP Officers or Staff have gained an unfair advantage or favour as a result of acceptance of gifts;
- BTP Staff do not accept gifts or hospitalities that will compromise their integrity or cause unprofessional behaviour and a neglect of duty, both in fact or insinuation;
- Any gifts or hospitalities (which are not included in section 7.3) accepted or declined are appropriately recorded in the Gifts and Hospitality Log.

5.3 It is not necessary to record gifts that are offered on a generic basis, which are always declined. An example of this could be promotional offers sent to BTP employees via email.

5.4 All BTP employees should abide by the seven principles of public life in accordance with the Nolan Committee report. The seven principles are Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership.

5.5 BTP employees are responsible for ensuring that any inappropriate acceptances of gifts by their colleagues are reported to PSD.



NOT PROTECTIVELY MARKED
BRITISH TRANSPORT POLICE

5.6 PSD will investigate any reported or suspected breach of this SOP and related policy statement.

6 GIFTS AND HOSPITALITY REGISTER

6.1 In line with HMIC recommendations and the Freedom of Information Act, BTP maintains a Gifts and Hospitality Register, in which all offers of gifts and hospitality will be recorded. Authorisation by line management should ideally be sought prior to the acceptance of gifts, however it is accepted that this is not always possible.

6.2 The process map outlines the process for the recording of all accepted or declined gifts and hospitality and can be found at Appendix A.

6.3 Where any BTP employee accepts or declines a gratuity over the value of £15 which is justifiable or reasonable and is in line with the Gift and Hospitality Policy it is necessary that details regarding the offered gratuity are sent to the employee's Line Manager via e-mail. The email will need to include the following details:

- The recipient name
- Date
- Description and value of the Gift or Hospitality
- The company/organisation offering the gift or hospitality

6.4 The Line Manager will need to complete the Gift and Hospitality Log with the necessary information and send this to the Area/Portfolio SPOC who will hold a central log of all gifts and hospitality received in their Portfolio or Area. Appendix C contains the current SPOC list. The Area/Portfolio SPOC will submit the completed Area or Portfolio Gift and Hospitality Log to the PSD IU based at Force Headquarters on a quarterly basis. All Area/Portfolio logs can be sent to the PSD IU using the following email address: GiftsRegister@btp.pnn.police.uk.

6.5 All gifts accepted or declined, worth over £15 must be registered and declared within 28 days to the Area/Portfolio SPOC (See Appendix C for the list of SPOCs)



NOT PROTECTIVELY MARKED
BRITISH TRANSPORT POLICE

11 MANAGEMENT OF RECORDS IN RELATION TO THIS SOP

11.1 The records and data maintained in respect of this SOP have to be justified. As such, the Gifts and Hospitality entries will be kept for four financial years from the creation date. At the beginning of the fourth financial year, the first year's data will be deleted.

11.3 The Gifts and Hospitality register will be published in accordance with the Freedom of Information 2009 Publication scheme adopted by BTP. PSD IU will be responsible for publishing the register disclosing gifts and hospitality received and declined by SCT members annually.

12. MONITORING AND COMPLIANCE

12.1 It is the responsibility for all Area Commanders and Portfolio Leads to ensure compliance with this SOP. Compliance in relation to submission of logs will be monitored by PSD IU through dip sampling and review of submissions. Information from the Gifts and Hospitality Register will be assessed by SCT prior to appropriate disclosure and publication.

13. APPENDICES

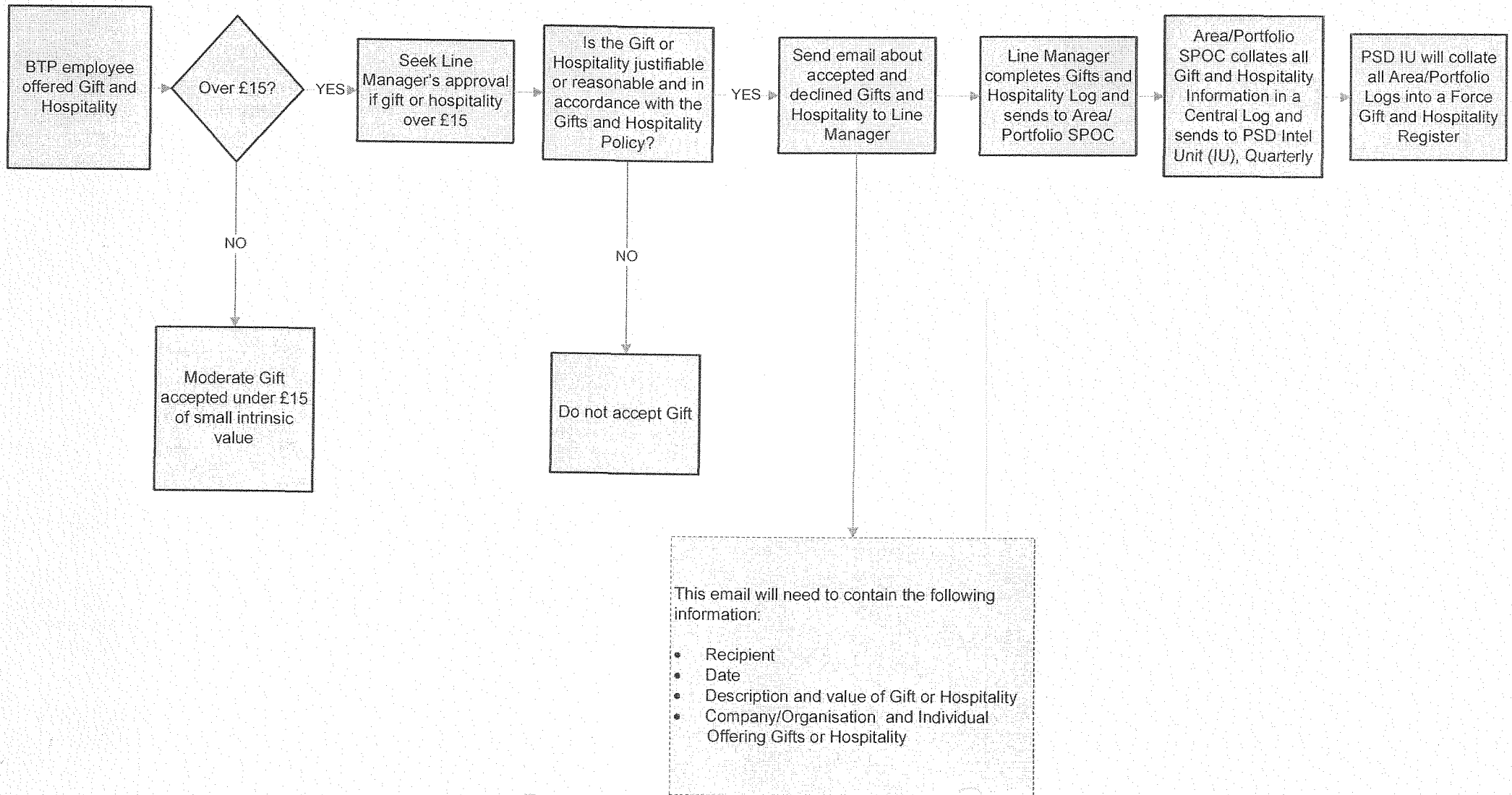
13.1 Appendix A: Process Map Gifts and Hospitality SOP.

Appendix B: Gifts and Hospitality Log.

Appendix C: Area and Portfolio Single Point of Contact.

Appendix D: Gifts and Hospitality Register.

Appendix A - Gift and Hospitality Log Process Map



APPENDIX B: GIFT AND HOSPITALITY LOG FORAREA/PORTFOLIO

Recipient	Date	Description of Gift or Hospitality	Company/Organisation /Individual offering Gift or Hospitality	Value of Item	Accepted/ Declined	Approved by:	Line Manager's Comments

Please send all Gift and Hospitality Logs via your Area/Portfolio SPOC to the PSD Intel Unit at: GiftsRegister@btp.pnn.police.uk

**APPENDIX C: AREA AND DEPARTMENT SINGLE POINT OF CONTACT
(SPOC)**

Area/Department	Name	Role
London South	Robin Richardson	Detective Inspector
London North	Paul McGregor	
London Underground	Donna Augustus	PA to Area Commander
North-East	Bev Mitchell	PA to Area Commander
North-West	Stuart Holmes	Head of Finance and Corporate Services
Wales and Western	Karen Taylor	Head of Finance and Corporate Services
Scotland	Anne Cochrane	Head of Finance and Corporate Services
DCC's Portfolio	Claire Woodfield	EA to DCC
Protective Services	Suzanne Caddell	Support Officer to Detective Chief Superintendent Protective Services
Territorial Policing	Julie Gunn	PA to Ch Supt TP
Operations	Lesley Warne	EA to ACC Operations
HR	Anna Wawrzyniak	EA to HR Director
Finance & Corporate Services	Kirsty Want	EA to Finance Director

APPENDIX D: FORCEWIDE GIFT AND HOSPITALITY REGISTER FOR THE BRITISH TRANSPORT POLICE

Recipient	Date	Description of Gift or Hospitality	Company/Organisation /Individual offering Gift or Hospitality	Value of Item	Accepted/ Declined