

<b>Policy &amp; Procedure Title:</b>	Gifts, Gratuities and Hospitality
<b>Workstream/Business Area:</b>	Professional Standards
<b>Policy Author:</b>	DCI Professional Standards
<b>Service Area Approval:</b>	Head Professional Standards
<b>Chief Officer Approval:</b>	Deputy Chief Constable
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<b>Rating:</b>	Medium
<b>Protective Marking</b>	Official

## POLICY UPDATES

Version	Date	Comments	Author	Approving Officer
11	27/06/2025	Periodic review of policy.	DCI Fuller	D Supt Payne
10	05/09/2023		DI Fuller	D Supt Payne
9	21/01/2021		Kath Hawke	D Supt PSD



## 1. PURPOSE

**This is a combined Policy and Procedure document however for simplicity will hereafter be referred to as ‘the policy’.**

Police officers and staff (referred to hereafter as ‘individuals’) are subject to clear standards of professional behaviour, these standards outline that staff are honest, act with integrity and do not compromise or abuse their position.

Individuals are reminded that the Code of Ethics and Guidance for Ethical and Professional Behaviour in Policing, sets out the principles that underpin the conduct and behaviour that is expected from all individuals employed by Gwent Police. The Code states that our high expectations demand that we *“neither solicit nor accept the offer of any gift, gratuity or hospitality that could compromise our impartiality (in accordance with force policies on gifts and gratuities)”*.

The purpose of this policy is to provide guidance on the boundaries for the acceptability of gifts, gratuities and hospitality that individuals may be offered in the course of their duties.

**All offers of gifts, gratuities and hospitalities must be declared in line with this policy including those that are declined by the individual, so that all offers can be recorded in the force register regardless of whether accepted or not.**

It is important that individuals do not find themselves beholden to any individual or organisation to such an extent that they are unable to impartially undertake their role within the police service or create any perception of the same.

The policy outlined below is in place to prevent allegations of corrupt practices or improper relationships with members of the public or a corporate body that could arise from the offer of gifts, gratuities or hospitality and to promote public trust and confidence in Gwent Police.

This policy is not in place to address specific acts of bribery that would be categorised as criminality under the Bribery Act 2010.

A flowchart and frequently asked questions section can be found at the end of this policy.

## 2. RELATED DOCUMENTS

- Code of Ethics and Guidance for Ethical and Professional Behaviour in Policing
- Vetting APP
- Freedom of Information

## 3. DEFINITIONS

- Outlined within narrative

## 4. LEGISLATIVE FRAMEWORK

- ACPO 2012 Guidance on Gifts, Gratuities and Hospitality
- Code of Ethics and Guidance for Ethical and Professional Behaviour in Policing
- Prevention of Corruptions Acts 1906 and 1916



- Bribery Act 2010.
- Freedom of Information Act 2000

Gwent Police will take firm action where breaches of the 2010 Bribery Act are concerned. This could include disciplinary procedures leading to dismissal, termination of contract and criminal prosecution.

It is important to note that failure to register a gift/hospitality/gratuity in line with this policy or failing to follow instructions given by the Professional Standards Department (PSD) if an application is refused, could constitute a breach of the Standards of Professional Behaviour and/or the Disciplinary Procedure for Police Staff which could lead to disciplinary proceedings. This applies equally to Police Officers and Police Staff.

## 5. QUALIFICATIONS

N/A

## 6. ENTITLEMENT

N/A

## 7. RESPONSIBILITIES

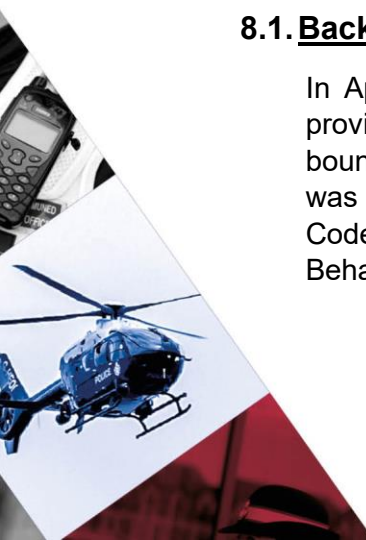
7.1. **All Officers and Staff** are responsible for ensuring:

- 7.1.1. The Code of Ethics and Guidance for Ethical and Professional Behaviour in Policing have been considered in the creation of this policy/procedure are adhered to when operating this policy & procedure.
- 7.1.2. They are mindful of and practice our local values and behavioural standards expected during all dealings with each other our community and our partners.
- 7.1.3. This Policy complies with the Welsh Language Standards in terms of dealing with the Welsh speaking public, impact upon the public image of the organisation and the implementation of the Welsh Language Standards.
- 7.1.4. This policy is written and operated in line with the Equality, Diversity and Inclusion direction and has been impact assessed.

## 8. PROCESS

### 8.1. Background

In April 2012, the Association of Chief Police Officers published guidance which provided police officers and staff with an ethical framework in which to determine the boundaries of acceptability relating to gifts, gratuities and hospitalities. This guidance was reinforced in 2014 by the Standards of Professional Behaviour outlined in the Code of Ethics and further since within the Guidance for Ethical and Professional Behaviour in Policing.



In relation to the offer of gifts, gratuities and hospitalities, PSD will maintain a register. This register will be under the direction and control of the Head of PSD, who will ensure scrutiny, auditing and governance of the register. Operational responsibility and decision making is delegated to the Deputy Head of PSD (Detective Chief Inspector (DCI)) who scrutinises, approves or refuses each application submitted (this can be delegated to a PSD Inspector during periods of absence/unavailability).

**Please note** there is no right of appeal to the approval decision and any rejection instructions must be followed.

The detail in the register will be anonymised which will allow it to be outward facing and published quarterly on the Gwent Police website.

An unedited version will also be sent to the OPCC on a quarterly basis for scrutiny.

All Police Officers, members of Police Staff and volunteers who are offered any gift, gratuity or hospitality regardless of whether this offer is accepted or not are required to notify PSD and to await authorisation for acceptance (unless the exemptions outlined below apply).

Notification should be made via PSD's online form, found on the PSD intranet front-page.

A PSD decision maker (Inspector or above but normally the PSD DCI) will review the application and grant or refuse its acceptance. The applicant will be informed of this decision via email.

## **8.2. Guiding Principles**

The principle is that individuals must decline an offer of any gift, gratuity or hospitality if acceptance may compromise their impartiality or create a perception of such a compromise.

Offers can vary widely from a genuine offer of a small gift in appreciation of good work, through to attempts at criminal offences of bribery.

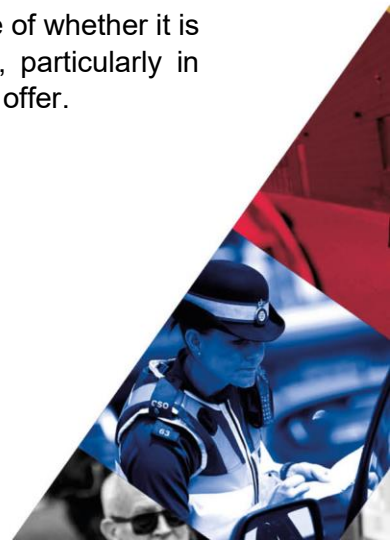
Gwent Police recognises that there are times when to decline an offer may cause offence or hinder productive working relationships with our communities or specific members of the community (for example a victim or a victim's family).

Sometimes to accept such an offer could be misinterpreted and could lead to inaccurate expectations of service or a favour.

Where doubt exists, the item(s) should be retained and booked into property, or the offer deferred, whilst advice from PSD is sought.

### **In all cases:**

The offer of a gift, gratuity or hospitality must be declared irrespective of whether it is accepted or rejected by the recipient. This demonstrates integrity, particularly in instances where there is any concern over the motivation behind the offer.



### Considerations for individuals, line managers & PSD decision makers:

In deciding whether an offer of a gift, gratuity or hospitality can be accepted, the following principles should be considered:

- **Genuine** - Is the offer made for reasons of genuine appreciation for something done, without any encouragement from me/the individual?
- **Independent** – If accepted, would a reasonable bystander be confident that I/the individual could be independent and impartial in doing my/their job?
- **Free** - Could I/the individual always feel free of any obligation to do something in return for the donor?
- **Transparent** – Would I/the organisation be comfortable if the accepted gift were transparently visible to colleagues, the force and the public?

### 8.3. Gifts, Hospitality and Gratuities – in detail:

#### 8.3.1. Gifts

Gifts may be accepted **with approval** and recorded on the register if they are:

- Bona fide, unsolicited and inexpensive gifts of thanks from members of the public or victims of crime. These may be offered to individual officers or teams in genuine appreciation of outstanding levels of service.
- For avoidance of doubt alcohol **can** be accepted and retained if it is proportionate to the circumstances. Each gift of alcohol will be considered on a case-by-case basis.

#### Consumption of perishable Items prior to obtaining authorisation:

It is recognised that some offers made in good faith will be of perishable food and drink that will spoil if stored awaiting authorisation.

In such cases, so long as the offer is proportionate to the act being thanked/appreciated, then immediate consumption is appropriate.

The individual officer or staff member will be expected to apply this test using their common sense and should seek guidance from a supervisor prior to consumption.

*For example: A box of cream cakes worth £10 is offered to a response officer to share with their colleagues would likely be proportionate, however, the offer to the same officer of a three-course meal worth £50 would not.*

Some gifts may be accepted in the following circumstances with **no requirement** to record on the register, if they are:

- Of a trivial or inexpensive seasonal nature (e.g. pocket diaries, calendars, stationery or other small items offered during a courtesy visit or conference e.g. pens).
- Gifts from overseas governments or other law enforcement organisations which are small commemorative items.





**The following gifts must not be accepted:**

- Cash or money in any form (including vouchers) must not be accepted and if they were accepted, will be rejected by the PSD decision maker (please see below regarding gift vouchers relating to refreshments under 8.3.2).
- A gift that is not cash, but has clear greater monetary value, such as an item of jewellery or a watch.  
(Good advice and to avoid offence or hinder working relationships would be to steer persons making monetary offers towards appropriate charity donations).
- Gifts from outside contractors or companies likely to become contractors, other than in exceptional circumstances and with the prior approval of a Chief Officer.
- The frequent acceptance of any gift, irrespective of value, from the same source.

Such offers should not be accepted **but must still be declared** to be recorded on the register.

### **8.3.2. Hospitality**

Unlike tangible gift items, offers of hospitality will often require consideration based on the context and circumstances.

Hospitality may be accepted in the following circumstances with **no approval or requirement to record** on the register if:

- Offered in professional settings as part of your duties and during a working day, such as attending meetings, seminars or conferences (e.g. tea and biscuits). This also includes a meal with a drink (non-alcoholic) if provided by another police force, partner agency or external body in training or other setting relating to law enforcement or community safety.
- Impromptu offers of light refreshments during policing duties (such as an offer of, or the purchasing for an individual of a cup of tea/coffee/biscuit/small snack).
- Please note, the acceptance of a low-value gift voucher **that enables an impromptu offer of light refreshments** and is clearly intended for that purpose is permitted. For example, rather than buying an individual a coffee, a member of the public hands the individual a £5 gift voucher that relates only to a premises selling light refreshments, or hands them a voucher that can be redeemed in a variety of outlets, but does so within or near an outlet offering only refreshments (with the clear intent of the voucher being used there). On the other hand, if the individual was handed a £5 gift voucher that could be spent in a variety of outlets not offering refreshments, or if the value was excessive, then this must be refused and treated as per cash gifts.

Other Hospitality may be accepted **with approval** and recorded on the register such as:

- An offer of hospitality involving the annual dinner of a representative association or local authority
- Invitations to sporting, cultural or social events (other than on official duties), offers of free travel and invitations to less relevant conferences/events.



especially in exotic locations, will be subject of close scrutiny during the approval stage and may be rejected.

- Particular caution should be exercised when offers of hospitality are made by members of the media or ex police officers or staff employed as private investigators or legal representatives.
- Consideration should always be given to the nature of the hospitality, as well as the character and position of the person making the 'offer' and indeed any other persons who have received similar invitations.

Individuals are also reminded that religious hospitality is prevalent and embedded in some diverse and minority communities in Gwent and individuals must consider the circumstances of each donor. In such circumstances, any refusal of hospitality needs to be tempered with enhancing community relationships and any perception of offence by the person(s), or community involved. To ensure public trust and confidence, we must play an active role in our communities by being visible and accessible to all local people, so we can listen and act on issues that matter the most to them. We will support all our communities to be safe and feel safe, including officers and staff, treating everyone with dignity and respect. Individuals are encouraged to seek advice from PSD or the force Equality, Diversity and Inclusion team in such instances.

#### **Hospitality must not be accepted if:**

- It amounts to regular free or discounted food or refreshments whether on or off duty.
- Includes a degree of lavishness which is outside of the industry norm or is beyond any sense of common courtesy or reasonableness.
- Is offered by outside contractors or companies likely to become contractors, other than in exceptional circumstances and with the prior approval of a Chief Officer.

Such offers of hospitality should not be accepted **but must still be declared** to be recorded on the register.

#### **8.3.3. Gratuities**

A gratuity is a monetary benefit, often given in response to someone who has performed a service.

A gratuity may be accepted and recorded on the register if it is in relation to:

- Offers or discounts negotiated through Gwent Police, the Police Federation, the Superintendents' Association, or other staff association or trade union and supported and publicised by the force (such as the Cycle to Work, GWP Rewards, Bluelight Card schemes or private health insurance).

There is no requirement to declare any such gratuity on the force register.

Gratuities which amount to individual gain from a points scheme when purchasing items, fuel, travel or accommodation in relation to Gwent Police business are not



permitted. For example, it is not acceptable for an individual to claim Nectar points on their personal Nectar card when buying fuel via a force fuel card for a force vehicle.

**No police officer or member of police staff will seek to obtain, negotiate or accept any individual or team discounts or benefits by virtue of their membership (temporary or otherwise) of Gwent Police.**

#### **8.4. Warrant and ID Cards**

The use of the Warrant or Identification Cards, for the purpose of obtaining discounts, favourable service, treatment, or access to places of entertainment, except on police business, is absolutely forbidden.

#### **8.5. Overarching notes**

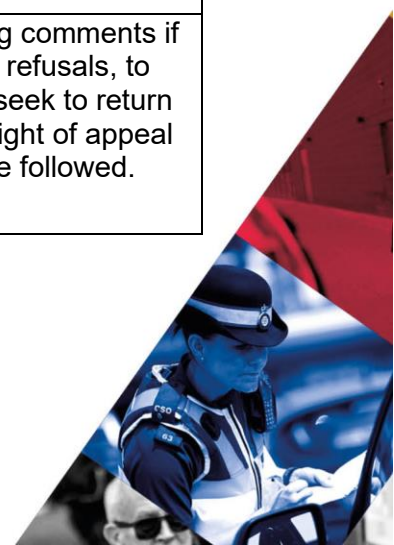
The overarching messages of this policy are:

- **This is about transparency, integrity and promoting high ethical standards.**
- **If in doubt seek advice.**
- **Remember to inform PSD of any non-accepted or inappropriate offers that you have declined. It is important that such offers and donors are monitored in case bribery or other concerns develop.**

## **9. APPENDICES**

### **APPENDIX 1 – Flowchart**

<b><u>STEP 1</u></b>	Applicant declares details of the gift/gratuity/hospitality via the Microsoft Forms link on the PSD Intranet front-page
<b><u>STEP 2</u></b>	The application automatically flows to the PSD DCI who considers the application in line with this policy. This is normally completed the same day, save for absences where a PSD Inspector may authorise (the perishable goods guidance also provides mitigation in this scenario)
<b><u>STEP 3</u></b>	The PSD DCI authorises/refuses the application, adding comments if necessary. Comments will normally be added only in refusals, to guide the applicant as to what steps to take next (e.g. seek to return the item, if impossible, donate to charity). There is no right of appeal to the decision and the rejection instructions must be followed.





<u>STEP 4</u>	The response from the PSD DCI flows automatically back to the applicant by email and at the same time all details and the decision are recorded on the register
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## APPENDIX 2 - Frequently Asked Questions:

### Question

**Can you provide a rough idea of the cost for what would be regarded as an “acceptable” gift that can be retained and what isn’t? I know it is on a case-by-case basis, but rough guides would be helpful.**

### Answer

It is considered that the value of a general “gift” would be £25 or under generally to be considered acceptable to be retained.

Anything with a greater value than this would subject to greater scrutiny and it is less likely that permission to accept it will be granted.

All gifts should be retained in the workplace until permission to accept is gained (with consideration to the note above on perishable items).

There is a requirement on the force to publish details of all gifts offered (including those that are not accepted) in an anonymised form on the Force external website so all offers of gifts, irrespective of value should be declared so that PSD can comply with this requirement.

### Question

**I have been invited to a formal dinner by my local community council, they have included a plus one with the invite, is this ok to accept?**

### Answer

Any hospitality that extends beyond normal work (including conferences or training courses that include a buffet, being offered a tea or coffee whilst taking a statement etc.) will need to be declared and permission given to attend. This applies even if you are attending in your capacity as a member of Gwent Police.

It is important to gain permission prior to attending the event, particularly where you are offered an invitation for a guest or the event involves the consumption of alcohol.

### Question

**Through work I have organised a free raffle and we had a significant number of gifts donated as prizes by members of the public and local business, is it ok to accept these prizes?**

### Answer

The force has to assure itself that any gift or donation accepted for whatever purpose is not likely to result in perceptions of impartiality.

Any donation should be genuinely made, freely given and transparent, with no expectation of reward or favour. For example, when determining whether a donation can be accepted,

consideration will be given to whether the donor intends to use the fact that they have donated a prize to promote their own interests.

It is unlikely that any gifts given towards a general raffle would be refused but they would still need to be declared and permission granted to accept prior to the raffle or event taking place.

### **Question**

**What should I do if I get offered small items of refreshments whilst on duty where I have to make a decision to accept or not immediately?**

### **Answer**

There is no requirement to declare occasional low value offers of what would be considered conventional hospitality and refreshment (tea/coffee/biscuits) offered in the course of your day-to-day duties, this would also include buffets at training and conference events. These can be accepted without the need to declare.

However acceptance of frequent or regular hospitality from the same person(s) or businesses is not acceptable.

### **Question**

**Recently a member of the public came to the station with approximately 10 boxes of chocolates for my team. It was clear to me as being a show of support and generosity from a member of the public who wanted to say thank you to the police. Should I declare these?**

### **Answer**

It is normal for members of the public to want to express their thanks to our staff, especially in the Christmas period. Whilst there are unlikely to be any issues in relation to the acceptance of gifts of this nature, they still need to be declared, recorded, and published on the force website for public scrutiny.

### **Question**

**My local supermarket café is offering discounted lunches to officers at my station. Can we utilise this offer?**

### **Answer**

Offers or discounts such as this should not be made locally and need to be assessed and if appropriate negotiated through Gwent Police.

