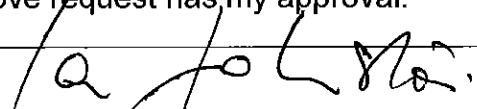


<b>Police and Crime Commissioner for Gwent Decision</b>	
PCCG-2014-098	Police and Crime Commissioner for Gwent Decision Session
Subject	Gifts and Hospitality Policy
Summary	To record the decision of the Police and Crime Commissioner regarding the Gifts and Hospitality Policy.

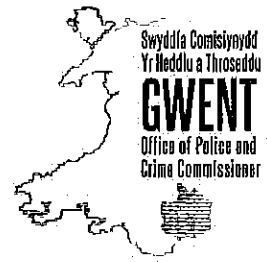
## DECISION

1. The aim of this policy is to increase public confidence by ensuring that the Police and Crime Commissioner for Gwent and his staff do not accept gifts and hospitality, otherwise than in accordance with the principles detailed in the procedure (Gifts and Hospitality) to this policy.
2. This policy covers situations where individuals may be offered gifts and/or hospitality. Those who are properly meeting members of the community in the normal course of their work may sometimes be offered 'gifts', a term which includes goods or payment and hospitality. To refuse such offers may cause offence or hinder working relationships. However to accept could equally be misinterpreted. It may lead to inaccurate expectations of favour or even constitute a criminal offence in some circumstances. There will also be occasions where specific advice is needed in the purchase of goods and service and the expenditure of public money.
3. The principle behind this policy is that the Police and Crime Commissioner and his staff should not accept gifts and hospitality, unless the principles outlined in the procedure are complied with. These principles apply to each offer of gifts or hospitality received on a personal basis. The policy does not apply to donations to the body corporate.

<b>Ian Johnston QPM, Police and Crime Commissioner for Gwent</b>	
I confirm I have considered whether or not I have any personal or prejudicial interest in this matter and take the proposed decision in compliance with my code of conduct. Any such interests are recorded below.	
The above request has my approval.	
Signed 	Date 5-1-15



<b>Contact Officer</b>	
Name	Sian Curley
Position	Head of Corporate Governance
Telephone	01633 643025
Email	<a href="mailto:Sian.Curley@Gwent.pnn.police.uk">Sian.Curley@Gwent.pnn.police.uk</a>
<b>Background papers</b>	Gifts and Hospitality Policy



## **OFFICE OF THE POLICE AND CRIME COMMISSIONER**

### **GIFTS AND HOSPITALITY POLICY AND PROCEDURE**

#### **POLICY**

The aim of this policy is to increase public confidence by ensuring that the Police and Crime Commissioner for Gwent and his staff do not accept gifts and hospitality, otherwise than in accordance with the principles detailed in the procedure (Gifts and Hospitality) to this policy.

This policy covers situations where individuals may be offered gifts and/or hospitality. Those who are properly meeting members of the community in the normal course of their work may sometimes be offered 'gifts', a term which includes goods or payment and hospitality. To refuse such offers may cause offence or hinder working relationships. However to accept could equally be misinterpreted. It may lead to inaccurate expectations of favour or even constitute a criminal offence in some circumstances. There will also be occasions where specific advice is needed in the purchase of goods and service and the expenditure of public money.

The principle behind this policy is that the Police and Crime Commissioner and his staff should not accept gifts and hospitality, unless the principles outlined in the procedure are complied with. These principles apply to each offer of gifts or hospitality received on a personal basis. The policy does not apply to donations to the body corporate.

#### **PROCEDURE**

This procedure covers situations where the Commissioner and his staff may be offered gifts and/or hospitality.

##### **1. GIFTS**

Gifts may only be accepted if they are:

- Of a trivial or inexpensive seasonal nature (e.g. pocket diaries, calendars)
- Gifts from overseas governments or organisations
- Gifts will not be accepted from outside contractors or companies likely to become contractors other than in exceptional circumstances and with the approval of the Chief Executive.

## 2. HOSPITALITY

A similar principle applies to the offer of hospitality in that:

- Offers of conventional hospitality (e.g. working breakfast lunch or dinner, refreshments provided during the course of attending seminars or conferences organised by outside bodies, the annual dinner of a representative association or local authority) which are limited to isolated occasions and can be shown to be in the interests of the Office of the Police and Crime Commissioner may be accepted. Any hospitality that extends beyond this will require the prior approval of the Chief Executive.
- Acceptance of frequent, regular hospitality, particularly from the same source, will in any case be in breach of this procedure.
- Invitations to sporting cultural or social events (other than on official duties), offers of free travel and invitations to conferences or other events, especially in exotic locations, should only be accepted in exceptional circumstances and then only with the approval of the Chief Executive.

## 3. THE ROLE OF THE CHIEF EXECUTIVE

Any case of doubt regarding the offer of gifts or hospitality should be referred to the Chief Executive, prior to acceptance. Factors to be taken into account will include the type, value and frequency of what is offered, the relationship involved and the risk to the image and reputation of the Office of the Police and Crime Commissioner. Each request will be considered on its merits and the Chief Executive's decision will be final.

## 4. REPORTING

Individuals shall report and record any exceptional offers of gifts or hospitality that have been declined. All gifts and hospitality accepted should be declared and the details forwarded to the Business Support Officer who will enter them into a register kept for that purpose. The details will include: -

- ✓ Date and time (date of acceptance of gift/hospitality)
- ✓ Recipients
- ✓ Identity of the individual and name of the organisation providing the gift/hospitality
- ✓ Estimated value of gift/hospitality provided
- ✓ Whether approval of Chief Executive sought, and if so, when granted (or denied) with reason for decision

The register will be open to inspection by the public.

**If there is the slightest doubt about the wisdom or propriety of accepting an offer of a gift or hospitality, it should be refused.**

Any assessment or action taken will be 'relevant and sufficient' and the least intrusive. Decisions made will be made fairly balancing between the restrictions on individual rights and the interests of the community at large. Therefore restrictions on individual rights will be proportionate and legitimate.

**The following is a useful checklist to assist all individuals in deciding whether they should accept gifts/hospitality:-**

- **Why is the offer being made?**
- **What are the background circumstances?**
- **Does the donor feel obliged to make the offer?**
- **What is the donor likely to expect in return?**
- **How does the intended recipient feel about the propriety of the offer?**
- **Is it really an integral and logical part of the business relationship or process?**
- **What could be the outcome for the Office of the Police and Crime Commissioner or the intended recipient if the offer is accepted or declined?**
- **What advice would the line manager give if they were with the recipient at the time the offer was made, or was aware of the offer?**
- **Would the recipient feel content, and easily able to justify its acceptance to the public?**

## **5. OVERSEAS GOVERNMENTS AND ORGANISATIONS**

Special considerations apply to gifts and hospitality from overseas governments and organisations. Although the principles set out above apply generally to such gifts and hospitality, there may be occasions when refusal could appear discourteous or a gift should be offered in return. The advice of the Chief Executive should be sought in such circumstances.

## **6. EMPLOYEES INTEREST IN CONTRACTS**

Offers from outside contractors will not generally be accepted, but under certain circumstances and subject to approval of the Chief Executive, may be permitted.

All individuals must be careful that they do not unwittingly commit the Police and Crime Commissioner to contractual obligations when responding to or initiating verbal or written enquiries with suppliers or contractors.

No member of the Office of the Police and Crime Commissioner, may become involved in, or accept a directorship in any company holding a contract with the Police and Crime Commissioner, without the express written permission of the Chief Executive.

There may be occasions when individuals come into official contact with a business organisation, contracted by the Police and Crime Commissioner, in which they, or a

family member have a known interest. In these circumstances the employee must immediately disclose this interest to the Chief Executive, who will nominate an appropriate person to undertake the work.

Individuals concerned in any way with official contracts or purchasing of goods and services will not disclose personal details of themselves or other individuals to a contractor for private contract purposes, e.g. delivery to, home address, e-mail address or telephone numbers.

No individual who is engaged in secondary employment may do anything that infers that the Office of the Police and Crime Commissioner is in anyway supportive of, or indeed involved with the activities undertaken by that person in the course of their secondary employment.

## **7. DISCOUNTS**

Group arranged discounts will be accepted provided they are transparent and properly negotiated through the Staff Associations and are given purely on the basis that the organisation has a large customer base. Care should be given as to the provider when ensuring that there is no likelihood that such agreements will give rise to public concern or effect public confidence in the organisation.

The Office of the Police and Crime Commissioner will not engage in the negotiation of discounts for its employees.

Any promotional gifts accompanying services purchased on behalf of the organisation, for example, tokens or points given away 'free' with the purchase of fuel for police vehicles, should not be accepted.

Private and personal arrangements in which a discount is offered, or sought, based upon employment with Police and Crime Commissioner for Gwent is not permitted.

## **8. WILLS**

There may be occasions when an individual, their partner, or a relative, benefits from a Will where it is, or could be perceived to be as a result of employment, engagement, or of a contract or business relationship developed through their status as a member of the Office of the Police and Crime Commissioner. In such circumstances the individual should report the benefit to the Chief Executive outlining the circumstances.