



**STANDARD OPERATING PROCEDURES:
OFFICE OF THE BEDFORDSHIRE POLICE AND CRIME COMMISSIONER**

Title	Gifts and Hospitality
Area of Compliance	Business and Compliance
SRR Ref. No.	PCC – SR8
SOP Ref. No.	009/2015
Version No.	Version 1.0
Senior Lead	Chief Executive
Author	Compliance Officer

Revision History

Date	Revision	Change	Section	Review Date
December 2015	1.0	New Document		

1. Purpose

1.1 The purpose of this document is to provide guidance to the Police and Crime Commissioner, Deputy Police and Crime Commissioner and all staff of the Office of the Police and Crime Commissioner (OPCC) in Bedfordshire, as to the acceptance of gifts, gratuities and hospitality.

1.2 The entire office must comply with this policy, though some sections are applicable only to the following due to the increased risk associated with their role:

- Police and Crime Commissioner (PCC)
- Deputy Police and Crime Commissioner (DPCC)
- Chief Executive and Monitoring Officer

This guidance is necessary to ensure that:

- The actions of members of Bedfordshire OPCC will not give rise to, or foster suspicion that outside individuals or organisations have gained favour or advantage,

Office of the Police and Crime Commissioner for Bedfordshire

Bridgebury House | Woburn Road | Kempston | Bedfordshire | MK43 9AX

Tel: 01234 842 066 | Email: pcc@bedfordshire.pnn.police.uk

Web: bedfordshire.pcc.police.uk | Twitter: [@BedsPCC](https://twitter.com/BedsPCC)

by any member of Bedfordshire OPCC accepting gifts or hospitality from any such person or organisation.

- No member of Bedfordshire OPCC will accept any gift or hospitality which could cause their judgement or integrity to be compromised, either in fact or by reasonable implication, and thereby damage the reputation of Bedfordshire OPCC.
- Any gift or hospitality, whether accepted or declined, will be recorded in the Gift and Hospitality Registry and will be subject of audits.

2. Affected persons

2.1 This policy will apply to all staff working in the Office Police & Crime Commissioner (OPCC) whether employed full-time or part-time, fixed term, permanent, seconded or on a temporary basis.

3. Strategic Risk Register

3.1 The Gifts and Hospitality policy will be monitored within the Strategic Risk Register to ensure full adherence to the policy at all times.

4. Policy

4.1 The following guidance is to be noted on instances where an exemption from any requirement to record is in order, and discretion may to an extent be exercised:

- Where there is an impromptu and unforeseen provision of light refreshments in line with staff duties.
- Where working lunches of a modest standard are offered during OPCC-related meetings, without alcoholic drinks.
- Where inexpensive promotional products from partnerships or conferences are offered to a maximum total value of £20.00.
- Where a discount is offered on a service or product that is available to the entire office.

4.2 All gifts, gratuities or hospitality, accepted or declined, which do not fall within the categories as stated in 4.1 above will be recorded by the PCC, DPCC and Chief Executive in the manner outlined in 4.3, and by all other OPCC staff as outlined in 4.4.

4.3 The following guidance applies to the PCC, DPCC, and Chief Executive. An individual Register for each of these positions is required to be updated and maintained by the claimant, with the latest edition to be published on the OPCC website quarterly. It is a statutory requirement that this information is available on an on-going basis.

4.4 The following guidance applies to all OPCC staff (excluding PCC, DPCC and Chief Executive). A single Register is available for completion by all OPCC staff working under the Chief Executive. This Register is maintained by the Compliance Officer for Standards and Integrity. Where possible, acceptance of gifts, gratuities or hospitality must be approved by the Chief Executive. Should there be any doubt as to whether a gift, gratuity or hospitality should be recorded; advice should be sought from the Chief Executive. This register is likely to be less populated than that of those referred to in 3.3, and as such will be published on the website only as often as the Compliance Officer for Standards and Integrity deems appropriate.

Policy Implications

4.5 The provisions of this policy are consistent with the Bribery Act 2010. As with all legislation, OPCC regulations must be read and given effect as far as possible in a way which is compatible with the European Convention on Human Rights. In particular, Article 8 of the Convention states that there shall be no interference with a person's private life unless:-

1. it is in accordance with the law, and
2. is necessary in a democratic society:-
 - In the interests of national security.
 - In the interests of public safety.
 - In the interests of economic well-being of the country.
 - For the prevention of disorder and crime.
 - For the protection of health and morals.
 - For the protection of the rights and freedoms of others.

4.6 Subject to proportionality it can be said on one or more grounds referred to above that restrictions on the receipt of gifts, gratuities and hospitality are necessary to ensure that the OPCC remains effective, protects its reputation, maintains high standards of conduct and probity from its staff, and avoids any conflict of interest within their duty as a holder of office or member of staff.

4.1 The risks emanating from the acceptance of Gifts, Gratuities and Hospitality are to both the individual's integrity and the organisation's reputation. Both of these risks will be mitigated by the adoption of this policy and adherence to its guidance.

5. Responsibilities

5.1 Responsibility for ensuring the effective implementation and operation of the arrangements will rest with the Business and Compliance Manager. Managers will ensure that they and their staff operate within this policy and arrangements, and that all



reasonable and practical steps are taken to avoid discrimination. Each manager will ensure that:

- All their staff are aware of the policy and the arrangements, and the reasons for the policy;