



Gifts, Gratuities and Hospitality Policy (Surrey and Sussex) (1201/2024)

Abstract

This policy outlines the process by which a gift, gratuity or hospitality must be declared and the circumstances in which members of Surrey Police and Sussex Police may be required to decline or permitted to accept them. It outlines responsibility to declare gifts, gratuities, and hospitality in order that each Force can be satisfied that there is no conflict of interest or undermining of personal and professional integrity.

Policy

1. Introduction

1.1 This policy provides police officers, Special Constables, and police staff with a framework to determine the boundaries of acceptability regarding the receipt of gifts, gratuity, and hospitality.

1.2 This policy is required to ensure police officers, police staff and Special Constables understand the criteria and restrictions for accepting gifts, gratuities, and hospitality whilst employed as a member of Surrey Police or Sussex Police (hereafter referred to as the Forces).

1.3 It is recognised that some police volunteer roles may be similar to that of police staff and therefore included within this policy.

1.4 An application for a gift, gratuity or hospitality must only be granted if the Forces are satisfied that there are no issues likely to affect public trust and confidence or conflict with the [Code of Ethics](#) or Standards of Professional Behaviour.

2. Scope

2.1 The procedures provide guidance to all individuals on how to submit a notification of a gift, gratuity or hospitality and the appeal process in the event a request is refused.

3. Policy Statement

3.1 The Forces will consider gifts, gratuities, and hospitality with impartiality and in line with national guidance. We will continue to meet our responsibilities to provide a service to the public whilst protecting the safety and integrity of individuals who have, or seek approval for a gift, gratuity, or hospitality. This policy and procedure are designed to promote consistent decision making in respect of gifts, gratuities, and hospitality which are inappropriate, and which could adversely affect the reputation of the individual, the Forces, and the wider police service.

3.2 The Gift, Gratuity, and Hospitality Policy is not intended to address donations and sponsorship or income generation. Donations and sponsorship are covered by the Donations and Sponsorship Received from Members of the Public, Companies and other Bodies Policy (Surrey and Sussex) (489). Income generation in Sussex Police is covered by the Income Generation and Charging Policy (490).

Procedure

1. Key Principles

1.1 Police officers, Special Constables and police staff must demonstrate the highest standards of professional behaviour. In particular, they must not compromise or abuse their position by soliciting the offer of any gift, gratuity or hospitality in any way connected to or arising from, their role whether on or off duty.

Where a gift, gratuity or hospitality is offered, it should ideally be politely refused. However, it is recognised that refusing a gift, gratuity or hospitality could cause offence to the donor and therefore it must be retained by the recipient's line manager until advice is sought from the Joint Force Vetting Unit (JFVU) on whether the gift, gratuity or hospitality can be accepted.

1.2 Police volunteers will be dealt with separately and on a case-by-case basis. Should a gift or hospitality be received by a Police Volunteer, advice should be sought from the JFVU in the first instance. See 1.3.

1.3 As a guiding principle, police officers, Special Constables, and police staff must not accept the offer of any gift, gratuity, favour, or hospitality without prior approval from the JFVU. This allows an independent assessment of any potential compromise or conflict of interest.

1.4 Offers of a gift, gratuity or hospitality vary widely and could range from a reasonable display of gratitude and common courtesy, which does not breach integrity of any party, through to criminal offences such as a breach of the [Bribery Act 2010 \(legislation.gov.uk\)](https://www.legislation.gov.uk).

1.5 The provisions of the Bribery Act 2010 contain 2 general offences. These include:-

- Section 1 – Offering, promising, or giving of a bribe (active bribery).
- Section 2 – Requesting, agreeing to receive, or accepting of a bribe (passive bribery).

The provisions of the Act extend the definition of bribery to include seeking (or agreeing), to bring about improper performance of duties which includes a public function such as policing. Improper performance amounts to any breach of an expectation that a person will act in good faith, impartially or in accordance with a position of trust.

1.6 The Act does not prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure, intended to improve the image of the Forces and their services, or build business relationships. However, it should be noted that hospitality, promotional or other similar business expenditure can be employed as a bribe. Considerations may include the lavishness of a gift, gratuity or hospitality, its relative

value, and the extent to which that gift, gratuity or hospitality is received. Previously offered or accepted gifts, gratuities or hospitality may also be relevant.

1.7 Police officers, Special Constables and police staff may occasionally be offered gifts or hospitality which are incidental to their duties. Examples of such include the provision of light refreshments as a common courtesy in line with policing duties, inexpensive promotional products from partnerships or conferences or discounts aimed at all members of the wider police service.

1.8 Police officers, Special Constables and police staff must be aware that at times a refusal to accept such an offer may cause unnecessary offence or might hinder productive working relationships. Equally to accept such an offer may be mis-interpreted and could lead to inaccurate expectations of favour or service.

1.9 Police officers, Special Constables and police staff must not produce a warrant card or ID card, or wear whole or part uniform, to obtain discounts, goods, or services unless as part of an approved arrangement. At no time should staff actively solicit hospitality. For example, this includes using a warrant or ID card to gain free access to nightclubs, sporting events or other commercial premises.

1.10 Police officers, Special Constables and police staff must not accept personal gifts of money (which includes gift vouchers or other forms of credit voucher) in the course of their duties or employment. Police officers, Special Constables and police staff must not accept gifts of alcohol. A gift of alcohol must be refused.

This includes any off-duty situation, where the gift is related to, or may appear to have a connection to their duties or employment.

2. Responsibilities and Contact Details

2.1 The JFVU has responsibility for gifts, gratuities, and hospitality, which includes recording, decision making and maintaining the single register for all gifts and hospitality applications for the Forces.

2.2 The Professional Standards Department (PSD) will ensure scrutiny, auditing, and governance of the register in line with wider corporate governance arrangements for integrity and counter corruption.

2.3 The register will be reviewed by the Forces respective Head of PSD in conjunction with the Joint Procurement Service. It is also subject to regular scrutiny by the Surrey or Sussex Office of the Police and Crime Commissioner.

2.4 The JFVU can be contacted for advice as follows.

Joint Force Vetting Unit (JFVU) Gifts and Hospitality Team.

Tel: 01273 018742.

Email: giftsandhospitality.vetting@sussex.police.uk

3. Application for Gifts, Gratuities and Hospitality

3.1 All gifts, gratuities, and hospitality require approval from the JFVU before they can be accepted. Police officers, Special Constables and police staff must complete an

application form as soon as possible or within a maximum of 7 days from the receipt of the gift, gratuity or prior to any hospitality offered. The gift, gratuity or hospitality must remain with the applicant's line manager, until approval has been given from the JFVU. Perishable items of low value may not be suitable to store until a decision has been received. It is accepted that such gifts or offers of hospitality may be consumed with a gift, gratuity and hospitality application being submitted retrospectively.

Application forms can be found on How do I? (HDI) Joint Force Vetting Unit. All applications must be sent to the JFVU via email.

Applications must include full details of the donor and describe the donor's relationship to the recipient, (victim of crime, member of public, business owner etc.), including NICHE reference numbers where appropriate.

3.2 Applications require a supporting rationale and agreement from the applicant's line manager. Line managers must consider the points in Gifts, Gratuities, and Hospitality Authorising Principles for Line Managers when making their decision. Any application received without a rationale from the applicant and line manager will not be accepted.

3.3 Applications may take up to 30 days to process and all decisions will be communicated to the applicant and line manager in writing.

3.4 Staff must also declare gifts, gratuities, and hospitality that are declined at the point it is offered. Such refusals must be disclosed to the Joint Force Vetting Unit as part of this policy.

4. Decision Making

4.1 Gifts, gratuities, and hospitality decisions will be made in accordance with the Code of Ethics and [National Decision Model \(NDM\)](#).

4.2 Gifts, gratuities, and hospitality decisions are made by the JFVU Supervisors, and all decisions will be communicated in writing to the applicant. Line managers will also be advised of the decision. The JFVU Supervisors will consider the appropriateness of the gift, gratuity, or hospitality in relation to the circumstances to which it was received and whether it would be considered reasonable in the eyes of the public.

4.3 The Gift, Gratuity, and Hospitality Policy is intended to manage low value items only and as a guide an upper limit of £20 is considered appropriate.

Each request will be assessed on a case-by-case basis. Where an application is granted the JFVU Supervisor will provide the applicant with written approval to accept the gift, gratuity, or hospitality.

Where an application is rejected the JFVU Supervisor will provide the applicant and line manager with the decision in writing along with the reasons why it cannot be accepted. Individuals are required to return the gift, gratuity or hospitality offer to the donor. Should the return of a gift, gratuity or hospitality not be appropriate, then it must be donated to one of the Chief Officer's charities.

5. Appeals

5.1 All applicants have the right to appeal, and these must be made in writing to the JFVU Manager within 14 days of being notified of the decision. All appeals will be reviewed by the JFVU Manager. In some cases, it may be necessary to refer an appeal to the Head of PSD or their appropriate deputy for the respective Force. In these cases, the Head of PSD or appropriate deputy will review the gift, gratuity, and hospitality, along with any associated rationale for decisions. They may also consult with any relevant staff networks, Police Federation or UNISON if required, to gather information for the final decision.

5.2 The final decision will be given to the applicant in writing within 30 days of receipt of the notice of appeal. After this, there is no further right of appeal.

6. Recording

6.1 All gifts, gratuities, and hospitality are recorded on the vetting management database Core-vet and maintained by the JFVU. An Anonymised extract of the database will be published on the Forces websites (as required under the [Freedom of Information Act 2000 Publication Schemes](#)) to provide transparency and to promote public confidence. The application, supporting documents and associated correspondence will be stored for monitoring purposes, and for the resolution of disputes. The content of the database will be available to both the Forces for lawful business purposes and for organisational management purposes.

7. Statistical Reporting

7.1 The JFVU report gifts, gratuities, and hospitality information and statistics to the Office of Police and Crime Commissioner and the Joint Audit Committee. Some department heads request reports for their business area, which is provided. The information is used for transparency to improve public confidence in the police service and for audit purposes. Any information or statistics used are anonymised for data protection purposes and any confidential information will not be disclosed.

8. Reporting Suspected Breaches

8.1 It is the responsibility of everyone to report any concerns about gifts, gratuities, and hospitality either through their line manager or by direct contact with the JFVU or PSD. Individuals are encouraged to report overtly to PSD where possible. Gifts, gratuities, and hospitality concerns can also be reported via the PSD's anonymous reporting systems which can be found via

Surrey: Anonymous Reporting

Sussex: Break the Silence - Anonymous Reporting

9. Information Management

9.1 Details relating to the nature of the gift, recipients and the donor will be retained for a period of seven years. Please refer to the Information Management Policy (Surrey and Sussex) (1187) for further guidance.

Team: Professional Standards Department