

Witness Name: **Catherine Crawford**

Statement no: **First**

Exhibits: **CC20**

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THE LEVESON INQUIRY

Exhibit CC20 to the
Witness Statement of **Catherine Crawford**



METROPOLITAN POLICE AUTHORITY

MPA briefing paper

Suitable for Publication Scheme: **N**
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This briefing paper has been prepared to inform members and staff on:

ASSOCIATION OF CHIEF POLICE OFFICERS (ACPO) GIFTS AND HOSPITALITY REGISTER (APRIL 2010-OCTOBER 2010)

This briefing paper has been prepared by Alan Johnson, extension

Summary

As part of the 2006-07 audit plan, Internal Audit Directorate (now the Directorate of Audit, Risk and Assurance) carried out a review of Gifts and Hospitality in the Metropolitan Police Service. A number of recommendations referred to the arrangements in respect of Association of Chief Police Officer (ACPO) ranks.

Gifts and hospitality (report on behalf of Director of HR)

Background

1. As part of the 2006-07 audit plan, Internal Audit Directorate carried out a review of Gifts and Hospitality in the Metropolitan Police Service (MPS). The objectives of the audit were to evaluate the adequacy and effectiveness of systems established by management for offers of gifts and hospitality. In particular we set out to provide assurance that controls exist and are operating effectively to ensure that:
 - an approved policy and clearly defined procedures for managing the receipt of gifts and hospitality are in place;
 - guidance is issued to MPS officers and staff in line with policy and clearly defines what procedures are to be followed when gifts or hospitality are offered or made;
 - a system for recording the offer of gifts and hospitality is in place and operating effectively;
 - a monitoring system is in place to ensure adherence to the gifts and hospitality policy

2. Although the majority of agreed recommendations were not relevant to this Committee there were a small number that were, namely:
 - Quarterly reports of gifts and hospitality are sent to the relevant Deputy Assistant Commissioner and Directors for review and a record is maintained of the review;
 - The following half yearly reviews of senior officer's gifts and hospitality registers are introduced and recorded:
 - The Commissioner and Deputy Commissioner's register is reviewed by the Chief Executive to the MPA;
 - The Deputy Commissioner reviews other Management Board members' registers;
 - The appropriate Management Board member reviews the Deputy Assistant Commissioners 'and Directors' registers.
 - The results of the review of Management Board members' gifts and hospitality registers will be reported to the Metropolitan Police Authority's (MPA's) HR and Remuneration Sub Committee at the next meeting.
3. This report consists of two quarterly reports, namely April-July 2010 (Appendix 1) and August-October 2010 (Appendix 2).

**REVIEW OF MANAGEMENT BOARD GIFTS AND HOSPITALITY REGISTERS
(AUGUST 2010)**

1. **Introduction**

- 1.1 In May 2007, MPA Internal Audit conducted an audit to evaluate the adequacy and effectiveness of systems established by management for offers of gifts and hospitality. One of the recommendations was that gifts and hospitality registers should be reviewed.
- 1.2 This is the quarterly review of Management Board gifts and hospitality registers (excluding the Commissioner and Deputy Commissioner who are subject to a separate report by the MPA to HR Remco). This paper therefore sets out the findings of the review for Management Board (MB) for the period April 2010 - (end) July 2010.

2. **Methodology**

- 2.1 The holders of the gifts and hospitality (G&H) registers within each Private Office have been identified and contacted. The registers were reviewed to assess whether policy requirements are being complied with.

3. **Findings**

A. **The Register**

- 3.1 The Principal should ensure that a hospitality register is kept securely by a named individual, who should be either the staff officer or PA to the relevant Director or Assistant Commissioner. **Finding:** All registers are kept by a named individual within private offices.
- 3.2 A permanent record of offers of G&H must be kept. A hard-backed bound register will normally be used to record entries in a chronological order (loose-leaved documents are not acceptable unless there is a clear sequentially numbered page serial). A register may also be kept in an electronic format providing safeguards exist on the entry and subsequent amendment of records. **Finding:** All registers are hard-backed bound ones with the exception of the Director of Human Resources, whose private office also maintain an electronic register. All the registers were sequentially numbered.
- 3.3 The policy requires that the hospitality register is kept securely. **Finding:** All registers are kept securely in the private offices, which are locked overnight or when staff are absent.
- 3.4 Registers should be retained securely for seven years after the last entry. **Finding:** None of the registers yet cover more than seven years.
- 3.5 The Standard Operating Procedures for the G&H policy set out what details must be recorded within registers. **Finding:** The items that are properly and consistently recorded across all the registers are the number, date entered, item or nature of the gift/hospitality offered, value, recipient, who it was offered by, their relationship to the recipient, whether it was accepted or declined, reasons given, special authority received, authorising officer's signature.

Appendix 1

- 3.6 Offers of alcohol should be politely declined. If it is not possible to decline such a gift, Internal Audit recommended that it should be donated to charity and a record maintained of the donation. **Finding:** Of the registers reviewed, where alcohol was accepted (not to cause offence) it was subsequently donated. Several offers were declined.

B. Vulnerable Posts

- 3.7 The G&H policy requires that the Principal should ensure that vulnerable posts are identified and that systems are put in place to ensure that the post holders make regular returns to the Hospitality Register Keeper (including nil returns). Annex A of the Standard Operating Procedure provides examples of vulnerable post holders. **Finding:** As the Principals all maintain a register the status as a vulnerable or non-vulnerable post is deemed not to be relevant.

C. Monitoring and Review

- 3.8 It is the responsibility of the Principal to ensure that the policy and guidance are complied with, and that the hospitality register is properly used, with a review and challenge mechanism in place. This report is respectfully submitted as the review of the Management Board registers for Quarter 1, 2010.

- 3.9 The policy also requires that the Principal ensures that the hospitality register is audited on a regular basis and that a summary is sent quarterly to the relevant authority. This report is respectfully submitted as the review for Quarter 1, 2010.

4. Conclusion and Recommendations

- 4.1 The purpose of the G&H policy is to ensure that the integrity and probity of the MPS and its individual members are not compromised by the offering, acceptance or rejection of gifts and hospitality. It is intended to ensure a consistent approach. The following recommendations are made to ensure greater compliance with policy:

- 4.2 As stated previously, the registers should be weeded after seven years.

- 4.3 All Principals should ensure that their G&H registers are reviewed/audited on a regular basis and a summary report sent quarterly to the Deputy Commissioner. **Finding:** This is consistently being applied with quarterly returns to MPA HR REMCO and internally via Performance Board (with returns submitted to Strategy & Improvement).

ANNEX A – Items Recorded Within Gifts and Hospitality Registers

Information / OCU	ACSO	ACSC	ACTP	ACCO	Director HR	Director DoI	Director DPA	Director Resources
Serial/index number for each entry	✓	✓	✓	✓	✓	✓	✓	✓
Date entered	✓	✓	✓	✓	✓	✓	✓	✓
Date gift/hospitality offered	✓	✓	✓	✓	✓	✓	✓	✓
Nature gift/hospitality offered	✓	✓	✓	✓	✓	✓	✓	✓
Value	✓	✓	✓	✓	✓	✓	✓	✓
Recipient	✓	✓	✓	✓	✓	✓	✓	✓
Name/company details of the person making the offer	✓	✓	✓	✓	✓	✓	✓	✓
Relationship	✓	✓	✓	✓	✓	✓	✓	✓
Whether accepted or refused	✓	✓	✓	✓	✓	✓	✓	✓
Reasons for acceptance or refusal	✓	✓	✓	✓	✓	✓	✓	✓
Date special authority received for the gift	✓	✓	✓	✓	✓	✓	✓	✓
Authorising officer's signature	✓	✓	✓	✓	✓	✓	✓	✓

ANNEX B - Breakdown by Management Board member (and their direct reports)

Business Group	Quarter 1 (April-July 2010)			Comment
	No. of entries	No. accepted	No. refused	
Central Operations	32	17	15	Reasons for refusal and acceptance were as follows - 3 X Business Dinners with private Industry Security Partners with regard to the Olympics, 8 x not to offend, monitoring a working partnership, Involved with MPS rowing project, Previous engagement, Covered by another SMT member, No longer Commander Westminster, Work Commitments, Already invited by another party, Small gift of book of stamps by royal mail by way of an apology, unavailable due to other commitments, opportunity to network with other companies involved in border & homeland security, and finally accepted as it was an educational visit
Commissioner's Private Office	50	14	36	Business invitations accepted/gifts accepted to prevent offence. Refusals due to conflicting diary commitments.
Director of Professional Services	0	0	0	Nil Return
Director of Legal Services	17	4	13	Staff accepted invitations as a "networking opportunity". Invitations were declined as they were classified as "Excessive Hospitality", "held away from chambers", "previous engagement" and some invitations "did not comply with MPS Policy", .
Directorate of Information	120	25	95	Majority not accepted due to unavailability and hospitality offers no benefit to MPS
Directorate of Resources	34	21	13	Check return
Directorate of Public Affairs	10	10	0	9 entries accepted - business lunches in relation to current media issues 1 entry accepted - thank you gift for presentation given to outside organisation, PRCA
Human Resources	46	43	3	Reason for acceptance HR Directors' Dinner-24 June, Master Class research & representing LA, In gratitude for customer service, Working lunches & gifts from The Ministry of Public Security of People's Republic of China, To retain effective working relationship, Free IT Trail (Community of Practice). Reason for refusal include 1-existing supplier which is tendering for other products and Not allowed under hospitality policy
Specialist Crime Directorate	21	18	3	Three invitations of hospitality were declined due to the high value and potential for negative publicity it was therefore decided that it would have been inappropriate to accept these offers

Business Group	Quarter 1 (April-July 2010)			
Specialist Operations	21	14	7	14 were accepted as they were professional security contacts. 7 were refused due to other diary commitments.
Territorial Policing	65	58	7	No specific comments provided.
Total				

**REVIEW OF MANAGEMENT BOARD GIFTS AND HOSPITALITY REGISTERS
(NOVEMBER 2010)**

1. **Introduction**

1.1 In May 2007, MPA Internal Audit conducted an audit to evaluate the adequacy and effectiveness of systems established by management for offers of gifts and hospitality. One of the recommendations was that gifts and hospitality registers should be reviewed.

1.2 This is the quarterly review of Management Board gifts and hospitality registers (excluding the Commissioner and Deputy Commissioner who are subject to a separate report by the MPA to HR Remco). This paper therefore sets out the findings of the review for Management Board (MB) for the period August 2010 - (end) October 2010.

2. **Methodology**

2.1 The holders of the gifts and hospitality (G&H) registers within each Private Office have been identified and contacted. The registers were reviewed to assess whether policy requirements are being complied with.

3. **Findings**

A. **The Register**

3.1 The Principal should ensure that a hospitality register is kept securely by a named individual, who should be either the staff officer or PA to the relevant Director or Assistant Commissioner. **Finding:** All registers continue to be kept by a named individual within private offices.

3.2 A permanent record of offers of G&H must be kept. A hard-backed bound register will normally be used to record entries in a chronological order (loose-leaved documents are not acceptable unless there is a clear sequentially numbered page serial). A register may also be kept in an electronic format providing safeguards exist on the entry and subsequent amendment of records. **Finding:** All registers are hard-backed bound ones. Some also maintain an electronic register. All the registers are sequentially numbered.

3.3 The policy requires that the hospitality register is kept securely. **Finding:** All registers are kept securely in the private offices, which are locked overnight or when staff are absent.

3.4 Registers should be retained securely for seven years after the last entry. **Finding:** None of the registers yet cover more than seven years.

3.5 The Standard Operating Procedures for the G&H policy set out what details must be recorded within registers. **Finding:** The items that are properly and consistently recorded across all the registers are the number, date entered, item or nature of the gift/hospitality offered, value, recipient, who it was offered by, their relationship to the recipient, whether it was accepted or declined, reasons given, special authority received, authorising officer's signature.

3.6 Offers of alcohol should be politely declined. If it is not possible to decline such a gift, Internal Audit recommended that it should be donated to charity and a record maintained

Appendix 2

of the donation. **Finding:** Where alcohol was accepted (not to cause offence) it was subsequently donated. Several offers were declined.

B. Vulnerable Posts

3.7 The G&H policy requires that the Principal should ensure that vulnerable posts are identified and that systems are put in place to ensure that the post holders make regular returns to the Hospitality Register Keeper (including nil returns). Annex A of the Standard Operating Procedure provides examples of vulnerable post holders. **Finding:** As the Principals all maintain a register the status as a vulnerable or non-vulnerable post is deemed not to be relevant.

C. Monitoring and Review

3.8 It is the responsibility of the Principal to ensure that the policy and guidance are complied with, and that the hospitality register is properly used, with a review and challenge mechanism in place. This report is respectfully submitted as the review of the Management Board registers for Quarter 2, 2010.

3.9 The policy also requires that the Principal ensures that the hospitality register is audited on a regular basis and that a summary is sent quarterly to the relevant authority. This report is respectfully submitted as the review for Quarter 2, 2010.

4. Conclusion and Recommendations

4.1 The purpose of the G&H policy is to ensure that the integrity and probity of the MPS and its individual members are not compromised by the offering, acceptance or rejection of gifts and hospitality. It is intended to ensure a consistent approach. The following recommendations are made to ensure greater compliance with policy:

4.2 As stated previously, the registers should be weeded after seven years.

4.3 All Principals should ensure that their G&H registers are reviewed/audited on a regular basis and a summary report sent quarterly to the Deputy Commissioner. **Finding:** This is consistently being applied with quarterly returns to MPA HR REMCO and internally via Performance Board (with returns submitted to Strategy & Improvement).

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Date gift/hospitality offered	✓	✓	✓	✓	✓	✓	✓	✓
Nature gift/hospitality offered	✓	✓	✓	✓	✓	✓	✓	✓
Value	✓	✓	✓	✓	✓	✓	✓	✓
Recipient	✓	✓	✓	✓	✓	✓	✓	✓
Name/company details of the person making the offer	✓	✓	✓	✓	✓	✓	✓	✓
Relationship	✓	✓	✓	✓	✓	✓	✓	✓
Whether accepted or refused	✓	✓	✓	✓	✓	✓	✓	✓
Reasons for acceptance or refusal	✓	✓	✓	✓	✓	✓	✓	✓
Date special authority received for the gift	✓	✓	✓	✓	✓	✓	✓	✓
Authorising officer's signature	✓	✓	✓	✓	✓	✓	✓	✓

ANNEX B - Breakdown by Management Board member (and their direct reports)

Business Group	Quarter 2 (Aug-Oct 2010)			Comment
	No. of entries	No. accepted	No. refused	
Central Operations	15	6	9	9 offers were refused due to the potential CO recipient being - "Previously Engaged" or "Committed Elsewhere" on the day of the hospitality event. Two acceptances were made as Refusal would offend. The following other reasons were recorded - gift of non value
Commissioner's Private Office	49	10	39	Business invitations accepted/gifts accepted to avoid causing offence. Invitations declined due to conflicting diary commitments.
Director of Professional Services	1	1	0	1 plaque and 1 pin from Chief of Police of Indonesian Police and Command College, presented to DCI Mehat. Accepted to avoid causing offence.
Director of Legal Services	106	49	57	Staff accepted the majority of the invitations as 'an opportunity for networking', 're-establishing ongoing relationships' or where 'there was no contractual relationship' with the organisation concerned. Staff declined invitations due to 'annual leave'.
Directorate of Information	74	18	56	Majority not accepted due to unavailability and hospitality offers no benefit to MPS. Those accepted offered opportunities for peer-to-peer networking with key suppliers.
Directorate of Resources	36	15	21	
Directorate of Public Affairs	18	18	0	16 entries accepted - business lunches. 1 entry accepted - Taxi from photo shoot to airport, annual leave cancelled to accommodate delay in shoot. 1 entry accepted - Bouquet of flowers for birthday from advertising agency, didn't want to cause offence
Human Resources	59	57	2	Acceptances: to maintain effective relationships, in line with policy. Refusals: One bottle of wine not allowed under hospitality policy and refusal of seats in box at West Ham, not allowed under hospitality policy.
Specialist Crime Directorate	24	21	3	Accepted - low value and to refuse may cause offence or lunch/dinner invitations. 2 refused as potential to jeopardise investigations 1 refused as unable to attend due to diary clash

Business Group				
Specialist Operations	26	12	14	12 were accepted as they were related to professional work events. 14 were declined because AC Yates was not available to attend.
Territorial Policing	90	83	7	No comments noted.
Total				