

Witness Name: **Julie Norgrove**

Statement no: **First**

Exhibit: **JN17**

**THE LEVESON INQUIRY**

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Exhibit JN17 to the  
Witness Statement of **Julie Norgrove**

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**PROPOSED REDACTIONS**



Metropolitan Police Authority

Corporate Governance Committee - 12 December 2011

**MPS GIFTS AND HOSPITALITY POLICY**

Report by Director of Resources on behalf of the Commissioner

**SUMMARY**

The revised MPS Gifts and Hospitality Policy and Standard Operating Procedures set out the processes for reporting offers of gifts and hospitality and the factors to be considered by those authorising acceptance. The procedures outline the behaviours expected of all employees, as well as their responsibilities towards the MPS and its customers, clients and service users. Following extensive consultation with MPS Staff Associations, Staff Support Associations, Business Groups, the MPA and the MPS Advisor for Police and Media relations, MPS Management Board approved the revised Gifts and Hospitality for publication. A copy of the Policy and Standard Operating Procedures are attached for the information of committee members together with details of the accompanying implementation plan and activity to address the issues arising from the recent MPA audit of MPS compliance with its current Gifts and Hospitality policy and processes.

**A. RECOMMENDATION - That members;**

1. Note the revised MPS Gifts and Hospitality Policy and the proposed implementation plan.

**B. SUPPORTING INFORMATION**

**Context**

1. In 2004 the MPS published the Gifts and Hospitality Policy and Standard Operating Procedure (SOP) and following publication the Policy and associated procedures have been continually revised. In August 2011, MPS Management Board requested that a comprehensive review of the Gifts and Hospitality Policy should be undertaken to reflect the requirements of the Bribery Act 2010 and to ensure that gifts and hospitality processes and procedures were managed more consistently and robustly across the organisation.

2. To assist with the development of the revised Policy and to ensure compliance with the MPS Policy Development Framework, extensive consultation has been undertaken with the MPS Advisor for Police and Media relations, MPS Staff Associations (TUS and the Federation) the Superintendent's Association, Staff Support Associations, MPS Business Groups and the MPA.
3. Following completion of the consultation exercise the Gifts and Hospitality Policy and SOP was revised and presented to MPS Management Board on 28 November 2011. The Board agreed that the Policy would be formally published in January 2012.
4. A summary of the Gifts and Hospitality Policy and SOP is provided in paragraphs 5-8 of this report. A copy of the revised Gifts and Hospitality Policy and SOP is attached at **Appendix 1**. Details of the proposed implementation plan are provided in paragraph 9-10 of this report. Paragraphs 11-13 of this report provide a summary of initial activity to address the issues arising from the recent MPA audit of MPS compliance with the current Gifts and Hospitality Policy and associated processes.

#### **Summary of Gifts and Hospitality Processes and Procedures**

5. The revised MPS Gifts and Hospitality Policy and Standard Operating Procedure set out the processes for reporting offers of gifts and hospitality and the factors to be considered by those authorising acceptance.
6. The procedures outline the behaviours expected of all employees, as well as their responsibilities towards the MPS and its customers, clients and service users. Specific guidance is provided in the following areas:
  - Consideration of offers of gifts or hospitality
  - Declining offers of gifts or hospitality
  - Authority levels for the acceptance or refusal of gifts and hospitality
  - Examples of gifts and hospitality
  - Hospitality provided by the MPS
  - Recording of gifts and hospitality
  - Reviews and publication
  - Penalties for inappropriate acceptance
  - The Bribery Act 2010
  - Suspected wrongdoing
  - Offers from contractors
7. The Policy explicitly states that:

*'It is the policy of the MPS that Police Officers, Special Constables, volunteers or staff employed by or under the direction and control of the Commissioner must not accept gifts, hospitality or other benefits or services that would place them, or be perceived to place them, under an obligation or compromise their judgement and integrity. Offers of gifts and hospitality must therefore be declined with an explanation of this policy. The only exception to this is where it can clearly be justified that to refuse would cause serious offence or damage working relations'.*

8. The revised Gifts and Hospitality Policy and SOP also stipulates that all MPS B/OCUs and Business Groups maintain a Gifts and Hospitality Register and that all items or services that are intended for use by the MPS, for example, donations of items for use by Police Officers and Staff or the loan of premises, must be recorded in the register within five days of acceptance/refusal.

#### **Gifts and Hospitality Implementation Plan**

9. Following publication of the Gifts and Hospitality Policy in January 2012 information about the revised Policy and SOP will be provided for all managers and staff via MPS People Pages together with a comprehensive set of Frequently Asked Questions. In addition an understanding of the key principles will be embedded into Police Officer recruit training, MSC training and the Police Staff induction programme. Regular codes of conduct alerts will also be published on the MPS Intranet. To further embed staff understanding of their key responsibilities in relation to gifts and hospitality training and development will be provided following completion of a Performance Needs Analysis. The results of the Performance Needs Analysis will recommend the most appropriate training and development intervention which may include the delivery of an E-Learning module for delivery in February 2012.
10. The publication of the revised Gifts and Hospitality Policy and SOP will also explicitly support the publication of the findings and recommendations arising from the report on Police Media relations produced by the MPS Advisor due to the direct links that exist between these areas of work.

#### **MPA Audit of MPS gifts and hospitality framework**

11. In November 2011 the MPA provided initial feedback on its audit of MPS compliance with the current Gifts and Hospitality Policy, SOP and associated processes. The MPA audit provides an assessment of the effectiveness of the existing governance framework in place to ensure that the integrity of the MPS was not compromised by the acceptance of gifts or hospitality or the provision of hospitality and makes a number of recommendations to improve performance.
12. The emerging findings of the MPA audit were that:
  - the current control framework in place for gifts and hospitality was not operating effectively to mitigate key risks to protect the integrity and reputation of the MPS
  - although procedures were in place to support the Policy they required greater clarity in places to ensure the policy intent was consistently met, particularly around the interaction with suppliers of goods and services
  - approval of the acceptance of gifts and hospitality was not consistently documented and that the standard of records generally needed to improve
  - the level of monitoring and review was felt to be inconsistent and had proved ineffective in highlighting areas of potential challenge.
13. A number of issues identified during the course of the MPA audit have already been addressed through the provision of greater clarity within the revised Gifts and Hospitality Policy and SOP about the professional and ethical standards required of officers and staff and information about the legislative framework. In

addition, the introduction of E-Registers to replace existing Gifts and Hospitality Registers is also anticipated to address concerns identified during the course of the MPA audit about the consistency and standard of record keeping. The MPS will continue to work closely with the MPA auditor to ensure that all of the issues arising from the MPA audit are fully addressed.

#### **Publication Schedule and Quality Assurance**

14. The Resources Directorate's Programme Office will arrange for the quality assurance and publication of the registers for Management Board, ACPO and equivalent police staff via the MPS Publication Scheme. Publication will be achieved within 15 working days of the end of each month.
15. Each business group will establish systems to quality assure and publish their registers, for officers and staff below ACPO level, within 20 working days of the end of the month. Business groups will also establish systems to monitor compliance with this policy.

### **C. OTHER ORGANISATIONAL & COMMUNITY IMPLICATIONS**

#### **Equality and Diversity Impact**

1. A full Equality Impact Assessment has been undertaken for the revised Gifts and Hospitality Policy and Standard Operating Procedures and has been submitted to the Diversity and Citizen Focus Directorate for quality assurance. An issue that has arisen during the course of the EIA relates to the sensitivity that will be required in the declining of gifts and hospitality (and the disposal of gifts) from religious leaders or those representing a particular community. Although the need to be sensitive in such situations is explicitly acknowledged in the revised Gifts and Hospitality Policy and SOP further consultation will be undertaken to develop more detailed guidelines. This guidance will be published as one of a series of FAQs in the Gifts and hospitality Section of People Pages

#### **Financial Implications**

2. Any costs associated with the development of an E-learning package will be met from within existing Business Group budgets.
3. Failure to comply with the corporate provisions of the Bribery Act 2010 could result in potential litigation costs in the defence of any corporate prosecution.

#### **Consideration of MET Forward**

4. The revised Gifts and Hospitality Policy and SOP directly support the Met Support and Met Standards strands of MET Forward.

### **Legal Implications**

5. The Bribery Act 2010 ("The Act") replaces the previous Anti-Corruption and Bribery laws e.g., The Public Bodies Corrupt Practices Act 1889, Prevention of Corruption Act 1906 and The Prevention of Corruption Act 1916 and abolishes the UK common law offences of bribery and embracery.
6. The Act is intended to "provide a modern and comprehensive scheme of bribery offences to equip prosecutors and courts to deal effectively with bribery at home and abroad". The Act came into force in April 2011 and creates criminal offences in relation to conduct which leads to or is intended to lead to "improper performance", i.e., performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust. Whether a person has behaved improperly is to be judged by what a reasonable person in the UK would expect.
7. Section 7 of The Act creates a new offence of failing to prevent a person associated with a relevant commercial organisation from bribing another to obtain or retain business or an advantage for the relevant commercial organisation. It is a defence for the relevant commercial organisation to prove that it had in place adequate procedures designed to prevent persons associated with it from undertaking such conduct. The relevant commercial organisation is a body incorporated to carry out business in the UK. Provided the organisation is incorporated it does not matter that it carries out purely public functions provided it carries out commercial activities. Whilst Section 7 does not appear to apply to the MPS the prospect under The Act of custodial sentences for up to 10 years per offence and unlimited fines clearly support the need to take steps to prevent reputational damage.

### **Environmental Implications**

8. There are no environmental implications associated with this report.

### **Risk (including Health and Safety) Implications**

9. Potential risks associated with non-compliance with the Gifts and Hospitality Policy and SOP include the cost of managing non compliance and the impact on the credibility and reputation of the MPS through public corporate prosecution.
10. There are no Health and Safety implications associated with this paper.

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Organisational Development Team.

APPENDIX 1

**Gifts and Hospitality  
Policy and Standard Operating Procedure**

**Contents**

1. **Introduction**
2. **Application**
3. **Purpose**
4. **Scope**
5. **Policy statement**
6. **Overriding principles**
7. **Consideration of offers of gifts or hospitality**
8. **Declining offers gifts or hospitality**
9. **Authority levels for the acceptance or refusal of gifts and hospitality**
10. **Examples of gifts and hospitality**
11. **Hospitality provided by the MPS**
12. **Recording of gifts and hospitality**  
*Reviews and publication*
13. **Associated issues**
  - *Penalties for inappropriate acceptance*
  - *The Bribery Act 2010*
  - *Suspected Wrongdoing*
  - *Hospitality provided by the MPS*
  - *Use of Warrant Cards/ Identification Cards to obtain Services*
  - *Relations with the Media*
  - *Payment for Interviews, Broadcasts and Speaking at External Events*
  - *Offers from Contractors*
  - *Offers of gifts and hospitality from personal friends*
  - *Sponsorship*
  - *Compensation*
  - *Awards and Prizes*
  - *Responsibilities*
14. **Associated Documents, Policies and Legislation**  
**Appendices:**
  - Annex A: Gifts and hospitality flow chart
  - Annex B: Gifts and hospitality action and disposal
  - Annex C: Gifts and hospitality which do not have to be entered onto the register
  - Annex D: Gifts and hospitality which should never be accepted
  - Annex E: Guidance on the management of the register
  - Annex F: Sample authorisation and registration form

## 1. Introduction

This Policy and its procedures underpin the standards of conduct expected from those who serve in public office set out by the Committee on Standards in Public Life (the Nolan Committee). The seven principles of selflessness, integrity, objectivity, accountability, openness, honesty and leading by example will underpin the work of all public authorities and all MPS officers, Special Constables, volunteers and staff employed by or under the direction of the Commissioner are required to adopt these principles as the basis for their working practices across the organisation.

This Policy and its procedures set out the process for reporting offers of gifts and hospitality and the factors to be considered by line managers who authorise acceptance.

These procedures take immediate effect and are designed to prevent bribery and corruption as well as protecting the reputation of the organisation and safeguarding individuals.

The Policy and procedures replace previous guidance contained in Item 3, Notices 5/09.

## 2. Application

All Police Officers, Special Constables, volunteers or staff employed by or under the direction and control of the Commissioner Officers and staff must be made aware of, and are required to comply with these procedures and all relevant MPS policy and associated procedures.

## 3. Purpose

The purpose of this Policy and procedures is to protect the integrity of the MPS and ensure that individual members of staff are not compromised by the acceptance, rejection or offering of gifts and hospitality.

## 4. Scope

This Policy and procedures apply to all Police Officers, Special Constables, volunteers or staff employed by or under the direction and control of the Commissioner when an offer of a gift or hospitality is either received or provided, whether on or off duty.

## 5. Policy Statement

It is the policy of the MPS that Police Officers, Special Constables, volunteers or staff employed by or under the direction and control of the Commissioner must not accept gifts, hospitality or other benefits or services that would place them, or be perceived to place them, under an obligation or compromise their judgement and integrity. Offers of gifts and hospitality must therefore be declined with an explanation of this policy. The only exception to this is where it can



clearly be justified that to refuse would cause serious offence or damage working relations.

All offers of gifts and hospitality whether accepted or declined, will be recorded in approved gifts and hospitality registers.

All gifts and hospitality registers will be regularly authorised, audited and published. A flow chart outlining the process is provided at Annex A.

## **6. Overriding Principles**

The guidance contained within this Policy is the minimum requirement. No part of the Policy or its procedures may be removed or altered.

## **7. Consideration of offers of gifts or hospitality**

Police Officers, Special Constables, volunteers or staff, including authorising officers, must always consider whether the acceptance of a gift or hospitality is appropriate or legal, and how it is likely to reflect upon the reputation of the MPS. Any gift or offer of hospitality that is accepted must be justifiable in terms of the benefit to policing London. On occasions where it is clear that to refuse a gift would cause serious offence or damage working relations, then the gift should be donated to a charity chosen by the MPS, and the acceptance noted with an authorising officer's rationale in the Gifts and Hospitality Register.

When considering the acceptance of items or services for use by the MPS, e.g. donations of items for use by police, or the loan of premises, it is important to consider:

- the motivation for the offer;
- the public perception of acceptance;
- the potential impact of acceptance on public confidence in the MPS's integrity, and
- whether, what at first sight appears to be an innocent offer could later become the subject of adverse comment or criticism

## **8. Declining offers**

All gifts and hospitality must be politely declined with an explanation of this policy. The only exception to this is where there is a valid reason to believe that to refuse the offer may cause serious offence or damage working relationships. Even a relatively small gift to a sole or key decision maker may fall within the scope of the Bribery Act 2010 if it could be perceived to elicit the improper performance of that function.

## **9. The authority levels for the acceptance or refusal of gifts and hospitality**

The authority level for the acceptance / refusal of gifts and hospitality must be no lower than OCU Cmdr / Department Head.

## 10. Examples of Gifts and Hospitality

Examples of gifts include:

- Cash
- Jewellery/ornaments/watches
- Bottle/s of wine and spirits
- Ceremonial gifts (for example, plaques, shields or glass or crystal ware)
- Confectionery
- Gift vouchers
- Stationery (for example, diaries, calendars, pens etc)
- Tickets to events

Examples of hospitality include:

- Invitation to attend conferences
- beverages or light refreshment
- offers of free meals
- excursions
- flights
- accommodation (including hotels)
- entry to sporting events and facilities
- entry to clubs

Examples of gifts and hospitality which do not have to be entered into the register are included in Annex C.

Examples of gifts and hospitality which should never be accepted are included in Annex D.

## 11. Hospitality provided by the MPS

Hospitality provided by the MPS is defined as any benefit, or benefit in kind provided by or on behalf of the MPS, that is provided at the discretion of the MPS, in the public interest, to further policing in London. Examples:

- Meals (buffets, refreshments or snacks)
- Drinks (beyond typical meeting provisions)
- Events and shows

## 12. Recording of Gifts and Hospitality

All gifts and hospitality, whether accepted or declined, must be reported to a line manager within 5 days and entered in the Gifts and Hospitality Register using the Authorisation and Registration form (Annex F).

Each Business Group lead or B/OCU Commander must appoint a Single Point of Contact (SPOC) responsible for maintaining local Gifts and Hospitality registers. This will typically be either the staff officer or personal assistant to the relevant Business Group lead/ B/OCU Commander.

Where a gift is accepted, a report must be sent to the appropriate ACPO Officer or Director (through the Business Group lead, B/OCU Commander) for a decision to be made on what should be done with the gift.

Any gift with an estimated value higher than £25 will be sold and the proceeds (via MPS Exchequer Services) donated to a charity chosen by the MPS. Lower value gifts should be donated to a locally identified charity. Further information on the disposal of gifts is contained in Annex B.

For security, access to the Gifts and Hospitality register must be limited to staff appointed to undertake the responsibility for maintaining the register, i.e. the SPOC. This must be accessible via the Business Group, B/OCU shared drive and protectively marked 'restricted' and password protected. Once the Authorisation and Registration form is received the SPOC will record the details in the Gifts and Hospitality Register.

Entries may only be reviewed and where appropriate removed after seven years in accordance with the MPS retention period. See Annex E for further guidance on the management of Gift and Hospitality Registers.

### Reviews and Publication

Individuals nominated to maintain Gift and Hospitality Registers must send quarterly reports of new entries to the relevant ACPO Officer/Director for review. A record of the review together with a copy the report will be maintained for scrutiny purposes.

Authority levels for the scrutiny and review of entries in registers will be undertaken as follows:

- The Deputy Mayor for Policing and Crime will review the registers of the Commissioner and Deputy Commissioner
- The Deputy Commissioner will review the registers of Management Board members
- Management Board members will review the registers of ACPO officers and Directors
- ACPO officers / Directors will review local B/OCU /Business Group registers every quarter
- The B/OCU Commander /Business Group lead will review B/OCU /Business Group registers

The Resources Directorate Programme Office will arrange for the quality assurance and publication of the registers for Management Board, ACPO and equivalent police staff via the MPS Publication Scheme within 15 working days of the end of the month.

Management Board members will establish systems for the publication of their registers, for officers and staff below ACPO level, within 20 working days of the end of the month. Management Board members will also establish systems to monitor compliance with this policy within their business group.

### 13. Associated issues

#### **Penalties for inappropriate acceptance**

Failure to follow this policy and procedure could render an individual liable to misconduct or disciplinary proceedings under the Police (Conduct) Regulations 2008 or Police Staff Discipline Procedures or lead to criminal proceedings under the Bribery Act 2010.

#### **The Bribery Act 2010**

The Bribery Act 2010 came into force in July 2011 and creates a criminal offence in relation to conduct which leads or is intended to lead to "improper performance". Improper performance means performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust. Whether a person has behaved improperly is to be judged by what a reasonable person in the UK would expect. Bribery can also relate to functions and activities improperly performed in the course a person's employment and activities improperly performed on behalf of a body of persons.

The acceptance of small gifts and reasonable hospitality made and accepted in good faith and recorded does not constitute an offence. Acceptance should however only be undertaken in full consideration of the guidance contained in this Policy and Standard Operating Procedure.

#### **Suspected Wrongdoing**

In any case where there is suspicion of wrongdoing (e.g. undue influence or a risk of unprofessional behaviour), the B/OCU Commander/Head of Branch must ensure that a full report is made (through the appropriate ACPO Officer/Director) to the Senior Director of HR who will consult with the Director of Resources and report to the Commissioner and the Mayor's Office for Policing and Crime as appropriate. Further information is also available from the Reporting Wrongdoing SOP.

Any MPS officer or staff who suspects wrongdoing must report this to their Line Manager immediately. This includes offers of bribes and requests for provision of confidential police information. Line Managers must ensure any such incidents are fully reported to the Directorate of Professional Standards Intelligence Development Group (IDG) Mailbox at the earliest opportunity.

Suspected wrongdoing can also be reported via the DPS Right Line (65599) or the DPS Mailbox.

#### **Hospitality provided by the MPS**

There will be occasions where there is a justified business need for hospitality to be provided by certain MPS role holders. The provision of such hospitality must be proportionate, appropriate and auditable and must:

- Not be offered on the basis of hospitality received or to induce favours;
- Not be afforded to the same individual or group on a regular basis;
- Not be extended to the husband, wife, partner, civil partner, son or daughter of the host or guest.

Detailed guidance in relation to hospitality provided by the MPS is available on the Gifts and Hospitality section of People Pages.

### **Use of Warrant Cards/ Identification Cards to obtain Services**

Warrant cards and Metropolitan Police Identification Cards must not be used to obtain discounted or free services or goods. However officers and staff can make use of authorised retail and other discount schemes (e.g. as advertised in *The Job* or *Met Benefits*) without the need to register. Metbenefits or those approved by MPS Staff Associations and Trade Unions on behalf of their members are also approved method for members of the MPS to gain access to general benefits that are widely and openly available.

### **Relations with the Media**

Please refer to the Media Relations Policy for further information on relations with the media.

### **Payment for Interviews, Broadcasts and Speaking at External Events**

Any payment made for interviews, broadcasts or for speaking at an external event while on duty must be declared using the relevant Authorisation Form and paid into the Mayors Office for Policing and Crime Fund via Exchequer Services. Further information in relation to this process can be obtained from the MPS Customer and Commercial Services Events Sponsorship and Intellectual Property Unit (ESIPU).

An individual will only be entitled to retain the payment if:

- the subject is unconnected with the normal duties of the person concerned;
- membership of the MPS is not an integral part of the interview or broadcast;
- the matter has been reported to a supervisor and prior approval obtained;
- and;
- the interview, broadcast or speaking event is not carried out in MPS time or using MPS facilities.

Where the event organiser requests details of fees to be charged, individuals should contact the Costing Team within the Finance Department (DoR Mailbox-Costing Team) for advice and guidance in respect of the charges to be made.

### **Offers from Contractors**

The standard conditions of government contracts prohibit a contractor from offering gifts or considerations of any kind with the object of obtaining preferential treatment in connection with a contract.

If any such offer is made to a member of staff or their immediate family (husband, wife, partner, civil partner, son or daughter), the facts must be reported as soon as practicable to the relevant Line Manager and the Directorate of Professional Services (DPS) via the Intelligence Development Group DPS Mailbox - IDG Reception.

Any offers of gifts or hospitality from a supplier where there is either an ongoing procurement exercise, or where there is a contractual dispute must be declined and the Director of Procurement informed of the offer. The Line Manager and DPS should also be informed via the Intelligence Development Group DPS Mailbox - IDG Reception.

It will be considered a breach of these procedures if an officer or member of staff accepts a gift from any contractor other than as set out in this Policy and procedures.

### **Gifts and Hospitality offered by a Personal Friend**

Gifts and hospitality offered by personal friends are subject to this policy if they are connected with an individual's role as a Police Officer, Special Constable, member of police staff or volunteer, or if there might be a perception that there is such a connection. For example, where the personal friend is employed by a current or prospective external contractor, or is the subject of a police investigation, particular caution should be exercised and the approach must be discussed with a line manager and the discussion minuted. It is important to always consider that what at first sight might seem an innocent offer could later be the subject of public criticism.

### **Sponsorship**

It is essential that all local sponsorship is referred to the Customer and Commercial Services Events Sponsorship and Intellectual Property Unit (ESIPU) before entering into any agreement or accepting any item. This ensures compliance with the Bribery Act 2010 and provides legal protection under police legislation regarding sponsorship

### **Compensation**

Any monies awarded as compensation by a criminal court may be kept by the individual to whom they have been awarded.

### **Awards and Prizes**

Awards and prizes in recognition of personal or organisational achievement may be accepted so long as they do not breach this Policy and its procedures.

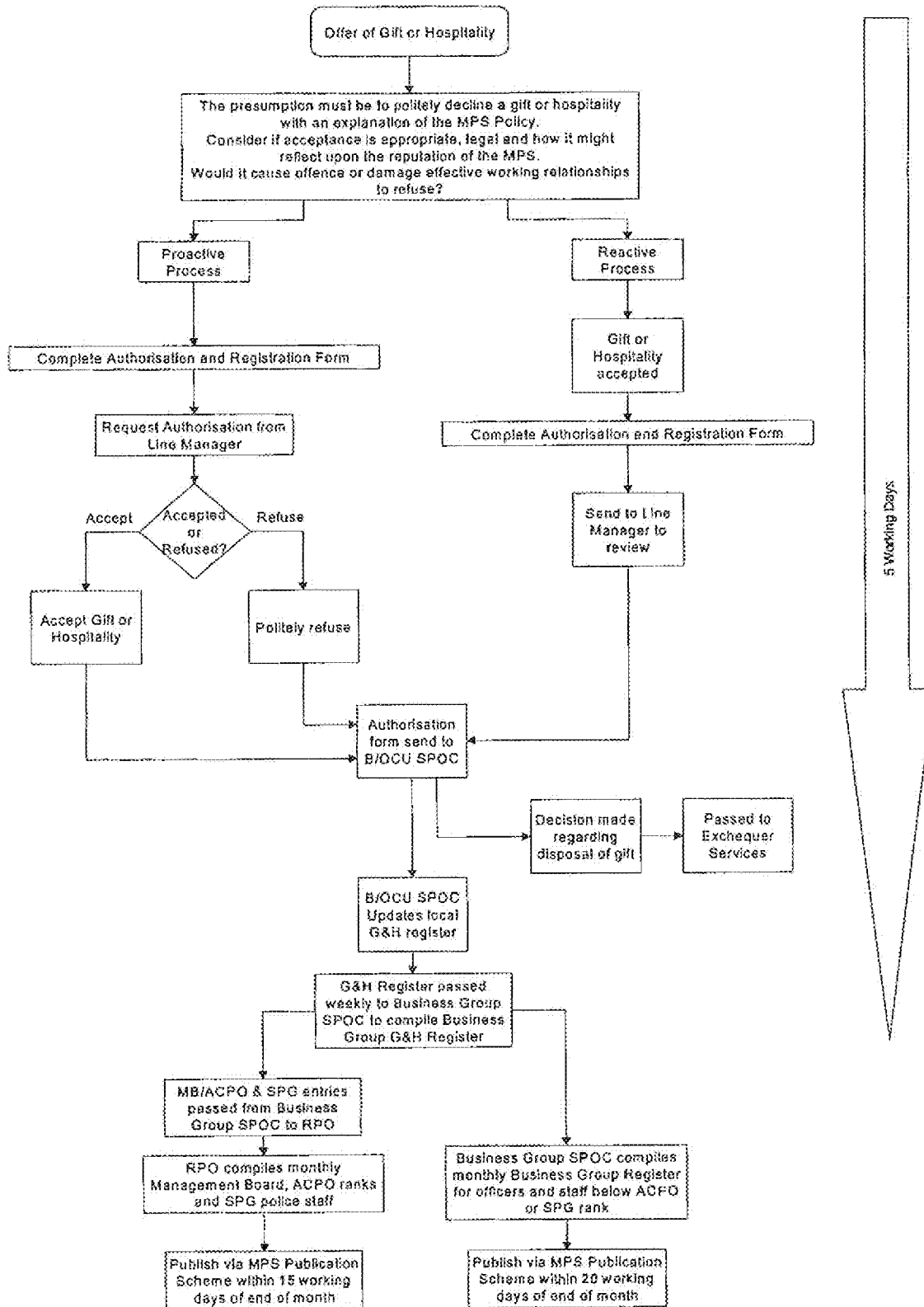
### **Responsibilities**

This Policy and its procedures are owned by Resources Directorate People Services and will be monitored and reviewed by the People Services Organisational Development Team.

**Associated Documents, Policies and Legislation**

- Gifts and Hospitality Policy
- Media Relations Policy
- Special Notice 5/00 - Prevention and Detection of fraud and theft
- Professional Standards Policy
- Business Interests, Secondary Employment and Political Activities SOP
- Bribery Act 2010
- PeoplePages - Gifts and Hospitality Frequently Asked Questions and Toolkit

Annex A: Gifts and Hospitality Flow Chart





**Annex B: Gifts and Hospitality Action and Disposal**

Example	Action / Disposal
<b>Cash</b>	The OCU Commander / Head of Business Group must be notified and arrangements made with Exchequer Services for the cash to be transferred to a charity chosen by the MPS.
<b>Jewellery / ornaments / watches</b>	Proceeds from the sale of items will be paid into Exchequer Services who will transfer the monies into a charity chosen by the MPS.
<b>Alcohol</b>	Proceeds from the sale of items will be paid into Exchequer Services who will transfer the monies into a charity chosen by the MPS.
<b>Invitation to attend Conference(s)</b>	The reason for such hospitality should be clearly related to the purpose of the event and therefore no subsequent justification of acceptance would be required. However, the hospitality should be recorded in the register if there is any question about the nature of the relationship between the MPS and the host organisation or where the value of the hospitality may be perceived as significant
<b>Invitation to attend overnight conference (costs met by host)</b>	The reason for such hospitality should be clearly related to the purpose of the event and therefore no subsequent justification of acceptance would be required. However, the hospitality should be recorded in the register if there is any question about the nature of the relationship between the MPS and the host organisation or where the value of the hospitality may be considered significant. Authority to attend must be sought from the Line Manager / appropriate level of authority prior to attendance.
<b>Expensive excursions</b>	Must be refused except in exceptional circumstances which must be justified in writing by a senior member of staff (at least ACPO/Director level) who must record the receipt and rationale in the Gifts and Hospitality Register.
<b>Complimentary tickets to functions / sporting events</b>	Should be refused except in exceptional circumstances. Must be justified in writing to the Line Manager who must approve in advance if tickets are to be accepted.

**Annex C:  
Examples Gifts and Hospitality which do not have to be included in  
the register**

Non alcoholic beverages e.g. a cup of tea / coffee and insignificant marketing or refreshment items freely available to all persons attending an event
Working lunches and dinners which form part of meetings, training events, presentations, conferences, seminars or similar events, where attendance is in the interest of the MPS for instance Safer Neighbourhoods Team (SNT) community meetings etc
Attendance at schools, lunches, dinners, receptions, or comparable functions organised by Embassies, cultural organisations, professional bodies and their equivalents, where attendance is in the capacity of an official MPS representative
Attendance at social events between colleagues / reciprocal between colleagues
Acceptance of minor gifts between colleagues and other constabularies, for instance badges, pens etc
Products purchased from MPS authorised discount schemes for example those advertised in <i>The Job</i> or <i>Met Benefits</i>
Inexpensive calendars / paperweights / badges / pens / coasters / plaques / plates / flags may be accepted provided that they bear the company's name or insignia

**Annex D:**

**Examples of Gifts and Hospitality which should never be accepted**

It will not be appropriate to accept invitations to sporting or social events, offers of free travel and/or accommodation, invitations to conferences or other events in foreign locations unless it is clear that the invitation is directly relevant to an individual's official duties
Financial payment resulting from the publication of articles related to an individual's role within the MPS. Payments offered should only be made to the MPS via Exchequer Services and not the individual.
Repeated acceptance of gifts and hospitality from the same person or organisation even where the value on each occasion is less than £25.
Gifts and hospitality offered from outside contractors or companies tendering for work or where there is an ongoing procurement exercise or contractual dispute

**Annex E****Management of the Gifts and Hospitality Register Checklist**

The overall responsibility for local registers rests with the Management Board Members/ B/OCU Commander / Directors

A permanent local record of offers of gifts and hospitality must be recorded in an electronic register using the Gifts and Hospitality template in the toolbox
For security, access must be limited to staff appointed to undertake the responsibility of maintaining the register, i.e. the Single Point Of Contact (SPOC). This must be subject to password protection due to the risk of alterations being made and be protectively marked 'restricted'
Electronic registers must only be accessible to appointed individual(s) via the B/OCU shared drive
All entries must be indexed and recorded in chronological order
All offers of gifts and hospitality must be registered within 5 working days of the offer being made, regardless of whether they are accepted or declined unless operational circumstances make it impractical to do so
Any corrections to the original entry should be struck out. The date of the new entry and reason for emendation must be recorded in the comments box
Entries may only be reviewed and where appropriate removed after seven years in accordance with the MPS retention period
Registers are to be made available for examination by senior staff, auditors, HMIC, the Mayor's Office for Policing and Crime, or other stakeholders who have a legitimate need for access
All offers of gifts and hospitality whether accepted or declined must be recorded in the register
Registers must hold details relating to hospitality provided by the MPS
Entries into the register will only be made when the authorisation form is received by the Single Point of Contact

**Annex F  
Sample Authorisation and Registration Form**

Protective marking	
Suitable for Publication Scheme Y/N	



**Working together for a safer London**

**Authorisation and Registration form for Gifts & Hospitality received by MPS Police Officers and Police Staff**

To: B/OCU Gifts & Hospitality Single Point Of Contact \*

(\*insert name of SPOC)

From: Name:.....(Please Print)

Warrant/Pay Number (inc. prefix) .....

B/OCU / Department/Team:.....

Date of gift/benefit/hospitality offered:	
Details of gift/benefit/hospitality (to include location address if relevant):	
Estimated value of Gift/Benefit/Hospitality:	
Reason for acceptance/refusal:	
If gift accepted, specify method of disposal i.e. retained by recipient/donated to named charity	
Person/body providing gift/benefit hospitality including relationship to MPS/member of staff:	
Is provider involved in MPS procurement process or has a contractual/grant-giving/regulatory relationship with MPS (or is actively considering such a relationship)?	

**Signature of recipient :** ..... **Date:** .....

**Rank / Band :** .....

**Approval of Line Manager**

I confirm that I am satisfied that the receipt/refusal of the above described gift/benefit/hospitality was appropriate for the reason stated.

**Signature of Line Manager:** ..... **Print Name:** .....

**B/OCU:** ..... **Date:** .....

**Approval of B/OCU Commander / Director**

I confirm that I am satisfied that the receipt/refusal of the above described gift/benefit/hospitality was appropriate for the reason stated.

**Signature of B/OCU Commander/Director:** ..... **Print Name:** .....

**B/OCU:** ..... **Date:** .....

**APPENDIX 1  
REVISED**

**Gifts and Hospitality  
Policy and Standard Operating Procedure**

**Contents**

1. Introduction
2. Application
3. Purpose
4. Scope
5. Policy statement
6. Overriding principles
7. Consideration of offers of gifts or hospitality
8. Declining offers gifts or hospitality
9. Authority levels for the acceptance or refusal of gifts and hospitality
10. Examples of gifts and hospitality
11. Hospitality provided by the MPS
12. Recording of gifts and hospitality  
*Reviews and publication*
13. **Associated issues**
  - *Penalties for inappropriate acceptance*
  - *The Bribery Act 2010*
  - *Suspected Wrongdoing*
  - *Hospitality provided by the MPS*
  - *Use of Warrant Cards/ Identification Cards to obtain Services*
  - *Relations with the Media*
  - *Payment for Interviews, Broadcasts and Speaking at External Events*
  - *Offers from Contractors*
  - *Offers of gifts and hospitality from personal friends*
  - *Sponsorship*
  - *Compensation*
  - *Awards and Prizes*
  - *Responsibilities*
14. **Associated Documents, Policies and Legislation**

**Appendices:**

Annex A:	Gifts and hospitality flow chart
Annex B:	Gifts and hospitality action and disposal
Annex C:	Gifts and hospitality which do not have to be entered onto the register
Annex D:	Gifts and hospitality which should never be accepted
Annex E:	Guidance on the management of the register
Annex F:	Sample authorisation and registration form

## 1. Introduction

This Policy and its procedures underpin the standards of conduct expected from those who serve in public office set out by the Committee on Standards in Public Life (the Nolan Committee). The seven principles of selflessness, integrity, objectivity, accountability, openness, honesty and leading by example will underpin the work of all public authorities and all MPS officers, Special Constables, volunteers and staff employed by or under the direction of the Commissioner are required to adopt these principles as the basis for their working practices across the organisation.

This Policy and its procedures set out the process for reporting offers of gifts and hospitality and the factors to be considered by line managers who authorise acceptance.

These procedures take immediate effect and are designed to prevent bribery and corruption as well as protecting the reputation of the organisation and safeguarding individuals.

The Policy and procedures replace previous guidance contained in Item 3, Notices 5/09.

## 2. Application

All Police Officers, Special Constables, volunteers or staff employed by or under the direction and control of the Commissioner must be made aware of, and are required to comply with these procedures and all relevant MPS policy and associated procedures.

## 3. Purpose

The purpose of this Policy and procedures is to protect the integrity of the MPS and ensure that individual members of staff are not compromised by the acceptance, rejection or offering of gifts and hospitality.

## 4. Scope

This Policy and procedures apply to all Police Officers, Special Constables, volunteers or staff employed by or under the direction and control of the Commissioner when an offer of a gift or hospitality is either received or provided, whether on or off duty.

## 5. Policy Statement

It is the policy of the MPS that Police Officers, Special Constables, volunteers or staff employed by or under the direction and control of the Commissioner must not accept gifts, hospitality or other benefits or services that would place them, or be perceived to place them, under an obligation or compromise their judgement and integrity. Offers of gifts and hospitality must therefore be declined with an explanation of this policy. The only exception to this is where it can clearly be justified that to refuse would cause serious offence or damage working relations.



All offers of gifts and hospitality whether accepted or declined, will be recorded in approved gifts and hospitality registers.

All gifts and hospitality registers will be regularly authorised, audited and published. A flow chart outlining the process is provided at Annex A.

## **6. Overriding Principles**

The guidance contained within this Policy is the minimum requirement. No part of the Policy or its procedures may be removed or altered.

## **7. Consideration of offers of gifts or hospitality**

Police Officers, Special Constables, volunteers or staff, including authorising officers, must always consider whether the acceptance of a gift or hospitality is appropriate or legal, and how it is likely to reflect upon the reputation of the MPS. Any gift or offer of hospitality that is accepted must be justifiable in terms of the benefit to policing London. On occasions where it is clear that to refuse a gift would cause serious offence or damage working relations, then the gift should be donated to a charity chosen by the MPS, and the acceptance noted with an authorising officer's rationale in the Gifts and Hospitality Register.

When considering the acceptance of items or services for use by the MPS, e.g. donations of items for use by police, or the loan of premises, it is important to consider:

- the motivation for the offer;
- the public perception of acceptance;
- the potential impact of acceptance on public confidence in the MPS's integrity, and
- whether, what at first sight appears to be an innocent offer could later become the subject of adverse comment or criticism

## **8. Declining offers**

All gifts and hospitality must be politely declined with an explanation of this policy. The only exception to this is where there is a valid reason to believe that to refuse the offer may cause serious offence or damage working relationships. Even a relatively small gift to a sole or key decision maker may fall within the scope of the Bribery Act 2010 if it could be perceived to elicit the improper performance of that function.

## **9. The authority levels for the acceptance or refusal of gifts and hospitality**

The authority level for the acceptance / refusal of gifts and hospitality must be no lower than OCU Cmdr / Department Head.

## 10. Examples of Gifts and Hospitality

Examples of gifts include:

- Cash
- Jewellery/ornaments/watches
- Bottle/s of wine and spirits
- Ceremonial gifts (for example, plaques, shields or glass or crystal ware)
- Confectionery
- Gift vouchers
- Stationery (for example, diaries, calendars, pens etc)
- Tickets to events

Examples of hospitality include:

- Invitation to attend conferences and charitable events
- beverages or light refreshment
- offers of free meals
- excursions
- flights
- accommodation (including hotels)
- entry to sporting events and facilities
- entry to clubs

Examples of gifts and hospitality which do not have to be entered into the register are included in Annex C.

Examples of gifts and hospitality which should never be accepted are included in Annex D.

## 11. Hospitality provided by the MPS

Hospitality provided by the MPS is defined as any benefit, or benefit in kind provided by or on behalf of the MPS, that is provided at the discretion of the MPS, in the public interest, to further policing in London. Examples include:

- Meals (buffets, refreshments or snacks)
- Drinks (beyond typical meeting provisions)
- Events and shows

## 12. Recording of Gifts and Hospitality

All gifts and hospitality, whether accepted or declined, must be reported to a line manager within 5 days and entered in the Gifts and Hospitality Register using the Authorisation and Registration form (Annex F).

Each Business Group lead or B/OCU Commander must appoint a Single Point of Contact (SPOC) responsible for maintaining local Gifts and Hospitality registers. This will typically be either the staff officer or personal assistant to the relevant Business Group lead/ B/OCU Commander.

Where a gift is accepted, a report must be sent to the appropriate ACPO Officer or Director (through the Business Group lead, B/OCU Commander) for a decision to be made on what should be done with the gift.

Any gift with an estimated value higher than £25 will be sold and the proceeds (via MPS Exchequer Services) donated to a charity chosen by the MPS. Lower value gifts should be donated to a locally identified charity. Further information on the disposal of gifts is contained in Annex B.

For security, access to the Gifts and Hospitality register must be limited to staff appointed to undertake the responsibility for maintaining the register, i.e. the SPOC. This must be accessible via the Business Group, B/OCU shared drive and protectively marked 'restricted' and password protected. Once the Authorisation and Registration form is received the SPOC will record the details in the Gifts and Hospitality Register.

Entries may only be reviewed and where appropriate removed after seven years in accordance with the MPS retention period. See Annex E for further guidance on the management of Gift and Hospitality Registers.

#### **Reviews and Publication**

Individuals nominated to maintain Gift and Hospitality Registers must send quarterly reports of new entries to the relevant ACPO Officer/Director for review. A record of the review together with a copy the report will be maintained for scrutiny purposes.

Authority levels for the scrutiny and review of entries in registers will be undertaken as follows:

- The Deputy Mayor for Policing and Crime will review the registers of the Commissioner and Deputy Commissioner
- The Deputy Commissioner will review the registers of Management Board members
- Management Board members will review the registers of ACPO officers and Directors
- ACPO officers / Directors will review local B/OCU /Business Group registers every quarter
- The B/OCU Commander /Business Group lead will review B/OCU /Business Group registers

The Resources Directorate Programme Office will arrange for the quality assurance and publication of the registers for Management Board, ACPO and equivalent police staff via the MPS Publication Scheme within 15 working days of the end of the month.

Management Board members will establish systems for the publication of their registers, for officers and staff below ACPO level, within 20 working days of the end of the month. Management Board members will also establish systems to monitor compliance with this policy within their business group.

### 13. Associated issues

#### Penalties for inappropriate acceptance

Failure to follow this policy and procedure could render an individual liable to misconduct or disciplinary proceedings under the Police (Conduct) Regulations 2008 or Police Staff Discipline Procedures or lead to criminal proceedings under the Bribery Act 2010.

#### The Bribery Act 2010

The Bribery Act 2010 came into force in July 2011 and creates a criminal offence in relation to conduct which leads or is intended to lead to "improper performance". Improper performance means performance which amounts to a breach of an expectation that a person will act in good faith, impartially, or in accordance with a position of trust. Whether a person has behaved improperly is to be judged by what a reasonable person in the UK would expect. Bribery can also relate to functions and activities improperly performed in the course a person's employment and activities improperly performed on behalf of a body of persons.

The acceptance of small gifts and reasonable hospitality made and accepted in good faith and recorded does not constitute an offence. Acceptance should however only be undertaken in full consideration of the guidance contained in this Policy and Standard Operating Procedure.

#### Suspected Wrongdoing

In any case where there is suspicion of wrongdoing (e.g. undue influence or a risk of unprofessional behaviour), the B/OCU Commander/Head of Branch must ensure that a full report is made (through the appropriate ACPO Officer/Director) to the Senior Director of HR who will consult with the Director of Resources and report to the Commissioner and the Mayor's Office for Policing and Crime as appropriate. Further information is also available from the Reporting Wrongdoing SOP.

Any MPS officer or staff who suspects wrongdoing must report this to their Line Manager immediately. This includes offers of bribes and requests for provision of confidential police information. Line Managers must ensure any such incidents are fully reported to the Directorate of Professional Standards Intelligence Development Group (IDG) Mailbox at the earliest opportunity.

Suspected wrongdoing can also be reported via the DPS Right Line (65599) or the DPS Mailbox.

### **Hospitality provided by the MPS**

There will be occasions where there is a justified business need for hospitality to be provided by certain MPS role holders. The provision of such hospitality must be proportionate, appropriate and auditable and must:

- Not be offered on the basis of hospitality received or to induce favours;
- Not be afforded to the same individual or group on a regular basis;
- Not be extended to the husband, wife, partner, civil partner, son or daughter of the host or guest.

Detailed guidance in relation to hospitality provided by the MPS is available on the Gifts and Hospitality section of People Pages.

### **Use of Warrant Cards/ Identification Cards to obtain Services**

Warrant cards and Metropolitan Police Identification Cards must not be used to obtain discounted or free services or goods. However officers and staff can make use of authorised retail and other discount schemes (e.g. as advertised in *The Job or Met Benefits*) without the need to register. Metbenefits or those approved by MPS Staff Associations and Trade Unions on behalf of their members are also approved method for members of the MPS to gain access to general benefits that are widely and openly available.

### **Relations with the Media**

Please refer to the Media Relations Policy for further information on relations with the media.

### **Payment for Interviews, Broadcasts and Speaking at External Events**

Any payment made for interviews, broadcasts or for speaking at an external event while on duty must be declared using the relevant Authorisation Form and paid into the Mayors Office for Policing and Crime Fund via Exchequer Services. Further information in relation to this process can be obtained from the MPS Customer and Commercial Services Events Sponsorship and Intellectual Property Unit (ESIPU).

An individual will only be entitled to retain the payment if:

- the subject is unconnected with the normal duties of the person concerned;
- membership of the MPS is not an integral part of the interview or broadcast;
- the matter has been reported to a supervisor and prior approval obtained; and;
- the interview, broadcast or speaking event is not carried out in MPS time or using MPS facilities.

Where the event organiser requests details of fees to be charged, individuals should contact the Costing Team within the Finance Department (DoR Mailbox-Costing Team) for advice and guidance in respect of the charges to be made.

### **Offers from Contractors**

The standard conditions of government contracts prohibit a contractor from offering gifts or considerations of any kind with the object of obtaining preferential treatment in connection with a contract.

If any such offer is made to a member of staff or their immediate family (husband, wife, partner, civil partner, son or daughter), the facts must be reported as soon as practicable to the relevant Line Manager and the Directorate of Professional Services (DPS) via the Intelligence Development Group DPS Mailbox - IDG Reception.

Any offers of gifts or hospitality from a supplier where there is either an ongoing procurement exercise, or where there is a contractual dispute must be declined and the Director of Procurement informed of the offer. The Line Manager and DPS should also be informed via the Intelligence Development Group DPS Mailbox - IDG Reception.

It will be considered a breach of these procedures if an officer or member of staff accepts a gift from any contractor other than as set out in this Policy and procedures.

### **Gifts and Hospitality offered by a Personal Friend**

Gifts and hospitality offered by personal friends are subject to this policy if they are connected with an individual's role as a Police Officer, Special Constable, member of police staff or volunteer, or if there might be a perception that there is such a connection. For example, where the personal friend is employed by a current or prospective external contractor, or is the subject of a police investigation, particular caution should be exercised and the approach must be discussed with a line manager and the discussion minuted. It is important to always consider that what at first sight might seem an innocent offer could later be the subject of public criticism.

### **MPS Special Constables (Employed as Part of the Employer Support Scheme) offered gifts or hospitality from their employers**

If a member of the MPS Special Constabulary (employed as part of the Employer Supported Scheme) is offered a gift or hospitality during the course of their primary employment it will be important to make sure that the motive of the offer is not connected to an individual's role as a Special Constable. If there is any doubt about the motivation of the offer of a gift or hospitality it should not be accepted.

### **Sponsorship**

It is essential that all local sponsorship is referred to the Customer and Commercial Services Events Sponsorship and Intellectual Property Unit (ESIPU) before entering into any agreement or accepting any item. This ensures compliance with the Bribery Act 2010 and provides legal protection under police legislation regarding sponsorship

### **Compensation**

Any monies awarded as compensation by a criminal court may be kept by the individual to whom they have been awarded.

### **Awards and Prizes**

Awards and prizes in recognition of personal or organisational achievement may be accepted so long as they do not breach this Policy and its procedures.

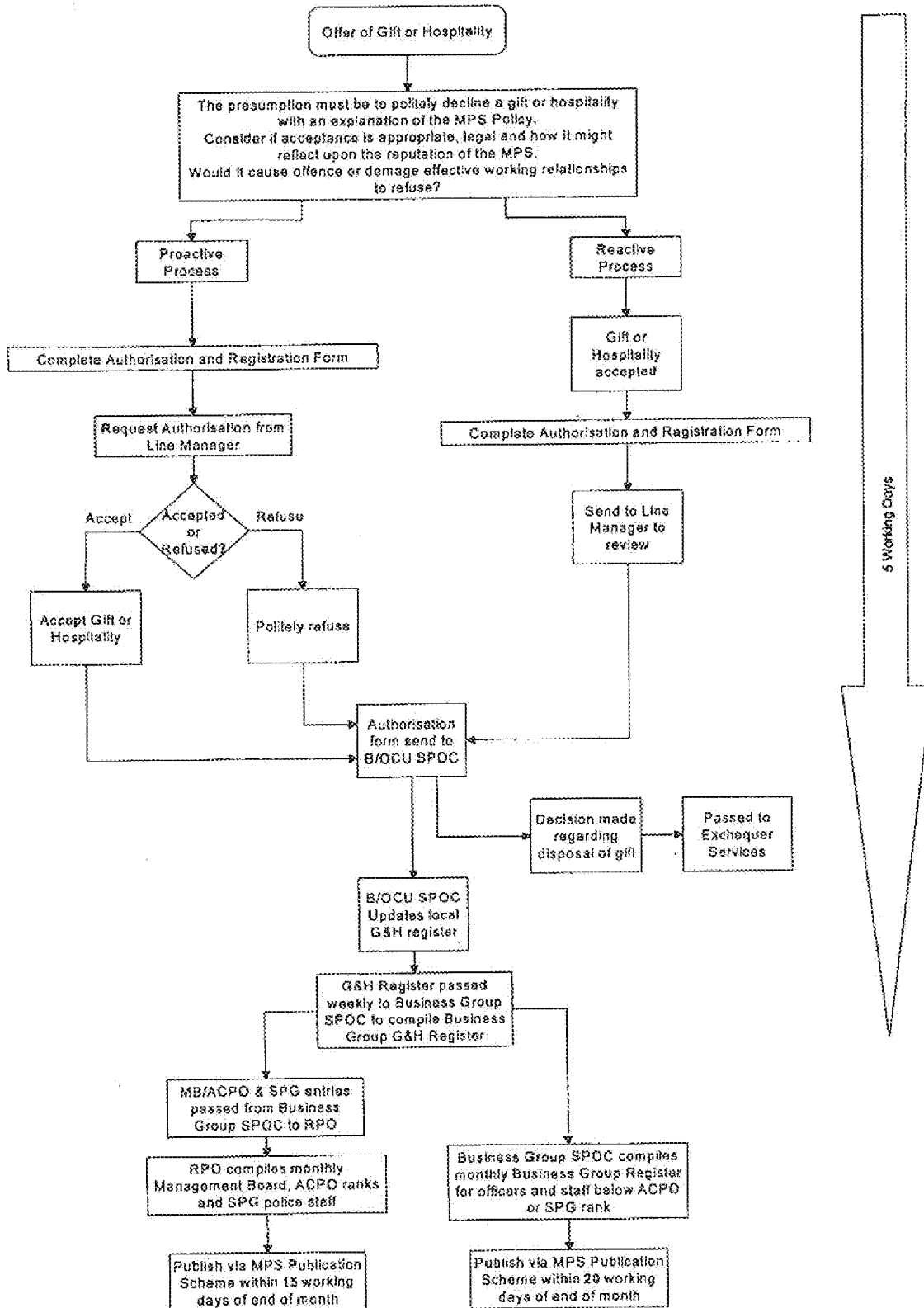
### **Responsibilities**

This Policy and its procedures are owned by Resources Directorate People Services and will be monitored and reviewed by the People Services Organisational Development Team.

### **Associated Documents, Policies and Legislation**

- Media Relations Policy
- Special Notice 5/00 - Prevention and Detection of fraud and theft
- Professional Standards Policy
- Business Interests, Secondary Employment and Political Activities SOP
- Declarable Associations SOP
- Bribery Act 2010
- PeoplePages - Gifts and Hospitality Frequently Asked Questions and Toolkit

Annex A: Gifts and Hospitality Flow Chart





**Annex B: Gifts and Hospitality Action and Disposal**

Example	Action / Disposal
Cash	The OCU Commander / Head of Business Group must be notified and arrangements made with Exchequer Services for the cash to be transferred to a charity chosen by the MPS.
Jewellery / ornaments / watches	Proceeds from the sale of items will be paid into Exchequer Services who will transfer the monies into a charity chosen by the MPS.
Alcohol	Proceeds from the sale of items will be paid into Exchequer Services who will transfer the monies into a charity chosen by the MPS.
Invitation to attend Conference(s), charitable events etc	The reason for such hospitality should be clearly related to the purpose of the event and therefore no subsequent justification of acceptance would be required. However, the hospitality should be recorded in the register if there is any question about the nature of the relationship between the MPS and the host organisation or where the value of the hospitality may be perceived as significant
Invitation to attend overnight conference (costs met by host)	The reason for such hospitality should be clearly related to the purpose of the event and therefore no subsequent justification of acceptance would be required. However, the hospitality should be recorded in the register if there is any question about the nature of the relationship between the MPS and the host organisation or where the value of the hospitality may be considered significant. Authority to attend must be sought from the Line Manager / appropriate level of authority prior to attendance.
Expensive excursions	Must be refused except in exceptional circumstances which must be justified in writing by a senior member of staff (at least ACPO/Director level) who must record the receipt and rationale in the Gifts and Hospitality Register.
Complimentary tickets to functions / sporting events	Should be refused except in exceptional circumstances. Must be justified in writing to the Line Manager who must approve in advance if tickets are to be accepted.

**Annex C:  
Examples Gifts and Hospitality which do not have to be included in  
the register**

Non alcoholic beverages e.g. a cup of tea / coffee and insignificant marketing or refreshment items freely available to all persons attending an event
Working lunches and dinners which form part of meetings, training events, presentations, conferences, seminars or similar events, where attendance is in the interest of the MPS for instance Safer Neighbourhoods Team (SNT) community meetings etc
Attendance at schools, lunches, dinners, receptions, or comparable functions organised by Embassies, cultural organisations, professional bodies and their equivalents, where attendance is in the capacity of an official MPS representative
Attendance at social events between colleagues / reciprocal between colleagues
Acceptance of minor gifts between colleagues and other constabularies, for instance badges, pens etc
Products purchased from MPS authorised discount schemes for example those advertised in <i>The Job</i> or <i>Met Benefits</i>
Acceptance of a leaving gift
Inexpensive calendars / paperweights / badges / pens / coasters / plaques / plates / flags may be accepted provided that they bear the company's name or insignia

**Annex D:**

**Examples of Gifts and Hospitality which should never be accepted**

It will not be appropriate to accept invitations to sporting or social events, offers of free travel and/or accommodation, invitations to conferences or other events in foreign locations unless it is clear that the invitation is directly relevant to an individual's official duties

Financial payment resulting from the publication of articles related to an individual's role within the MPS. Payments offered should only be made to the MPS via Exchequer Services and not the individual.

Repeated acceptance of gifts and hospitality from the same person or organisation even where the value on each occasion is less than £25.

Gifts and hospitality offered from outside contractors or companies tendering for work or where there is an ongoing procurement exercise or contractual dispute

**Annex E****Management of the Gifts and Hospitality Register Checklist**

The overall responsibility for local registers rests with the Management Board Members/  
B/OCU Commander / Directors

A permanent local record of offers of gifts and hospitality must be recorded in an electronic register using the Gifts and Hospitality template in the toolbox
For security, access must be limited to staff appointed to undertake the responsibility of maintaining the register, i.e. the Single Point Of Contact (SPOC). This must be subject to password protection due to the risk of alterations being made and be protectively marked 'restricted'
Electronic registers must only be accessible to appointed individual(s) via the B/OCU shared drive
All entries must be indexed and recorded in chronological order
All offers of gifts and hospitality must be registered within 5 working days of the offer being made, regardless of whether they are accepted or declined unless operational circumstances make it impractical to do so
Any corrections to the original entry should be struck out. The date of the new entry and reason for emendation must be recorded in the comments box
Entries may only be reviewed and where appropriate removed after seven years in accordance with the MPS retention period
Registers are to be made available for examination by senior staff, auditors, HMIC, the Mayor's Office for Policing and Crime, or other stakeholders who have a legitimate need for access
All offers of gifts and hospitality whether accepted or declined must be recorded in the register
Registers must hold details relating to hospitality provided by the MPS
Entries into the register will only be made when the authorisation form is received by the Single Point of Contact

**Annex F  
Sample Authorisation and Registration Form**

Protective marking	
Suitable for Publication Scheme Y/N	



**Working together for a safer London**

**Authorisation and Registration form for Gifts & Hospitality received by MPS Police Officers and Police Staff**

**To:** B/OCU Gifts & Hospitality Single Point Of Contact \*

(\*insert name of SPOC)

**From: Name:**.....(Please Print)

**Warrant/Pay Number (inc. prefix)** .....

**B/OCU / Department/Team:**.....

<b>Date of gift/benefit/hospitality offered:</b>	
<b>Details of gift/benefit/hospitality (to include location address if relevant):</b>	
<b>Estimated value of Gift/Benefit/Hospitality:</b>	
<b>Reason for acceptance/refusal:</b>	
<b>If gift accepted, specify method of disposal i.e. retained by recipient/donated to named charity</b>	
<b>Person/body providing gift/benefit hospitality including relationship to MPS/member of staff:</b>	
<b>Is provider involved in MPS procurement process or has a contractual/grant-giving/regulatory relationship with MPS (or is actively considering such a relationship)?</b>	

Signature of recipient : ..... Date: .....

Rank / Band : .....

**Approval of Line Manager**

I confirm that I am satisfied that the receipt/refusal of the above described gift/benefit/hospitality was appropriate for the reason stated.

Signature of Line Manager: ..... Print Name: .....

B/OCU: ..... Date: .....

**Approval of B/OCU Commander / Director**

I confirm that I am satisfied that the receipt/refusal of the above described gift/benefit/hospitality was appropriate for the reason stated.

Signature of B/OCU Commander/Director: ..... Print Name: .....

B/OCU: ..... Date: .....