

AUDIT PANEL

Friday, 31 March 2017

MPS Gifts and Hospitality Registers (August 2016 – February 2017)

Report by: Assistant Commissioner of Professionalism on behalf of Commissioner

1. Report Summary

The 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 or declining them. The procedures outline the behaviours expected of all officers and staff, as well as their responsibilities towards the MPS and its customers, clients and service users. A key requirement of the policy is that the Gifts and Hospitality registers for all MPS B/OCUs and Business Groups, Management Board, ACPO and equivalent police staff, should be published monthly via the MPS Publication Scheme. This report provides a summary of the Gifts and Hospitality Registers for August 2016 – February 2017.

2. Recommendations - that the Audit Panel note and approve the content of this report.

3. Supporting Information

Introduction

- 3.1 In 2004 the MPS published its first Gifts and Hospitality Policy and Standard Operating Procedure (SOP) and, following publication, the policy and associated procedures have been updated and re published October 2016. 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 consistently and robustly across the organisation. Following extensive consultation with MPS Staff Associations, Staff Support Associations, MPS Business Groups and the MPA the revised policy was published in February 2012.

Summary of Gifts and Hospitality Processes and Procedures

- 3.2. The MPS Gifts and Hospitality Policy and Standard Operating Procedure set out clear processes for the reporting of offers of gifts and hospitality and the factors to be considered by those authorising acceptance or declining them.
- 3.3 The procedures outline the behaviours expected of all staff, as well as their responsibilities towards the MPS and its customers, clients and service users. Specific guidance for staff 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
- 3.4 The Policy explicitly states that:

'It is the policy of the MPS that Police Officers and staff, including the extended police family and those working voluntarily or under contract to the Mayor's Office of Police and Crime 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'.

- 3.5 The Gifts and Hospitality Policy and SOP also stipulate that all MPS B/OCUs and Business Groups maintain a Gifts and Hospitality Register and that these should be published monthly via the MPS Publication Scheme. The monthly publication of Gifts and Hospitality registers replaced the previous quarterly publication cycle and a summary of all gifts and hospitality accepted or declined by Management Board principals, BOCU/S and Business Groups for August 16 – February 17 is detailed in tables 1 - 7 below of this report.

Table 1: Gifts and Hospitality Accepted or Declined: August 2016

Management Board Principal, B/OCU, Business Group	Accepted	Declined	Total all offered
Commissioner	2	1	3
Deputy Commissioner	3	0	3
Directorate of Professionalism	0	0	0
Portfolio and Planning	0	0	0
Commercial and Finance Services	1	1	2
HR Directorate	0	0	0
Specialist Crime and Operations	0	0	0
Shared Support Services	1	1	2
Digital Policing	0	0	0
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	0	6	6
Specialist Operations	3	0	3
Total	10	9	22
% of all Gifts or Hospitality Offered	53%	47%	

Table 2: Gifts and Hospitality Accepted or Declined September 2016

Management Board Principal, B/OCU, Business Group	Accepted	Declined	Total all offered
Commissioner	16	16	32
Deputy Commissioner	1	2	3
Directorate of Professionalism	2	0	2
Commercial and Finance Services	3	2	5
Portfolio and Planning	0	0	0
HR Directorate	0	2	2
Specialist Crime and Operations	4	1	5
Shared Support Services	0	0	0
Digital Policing	0	0	0
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	4	0	4
Specialist Operations	13	9	22
Total	44	38	82
% of all Gifts or Hospitality Offered	54%	46%	

Table 3: Gifts and Hospitality Accepted or Declined October 2016

Management Board Principal, B/OCU, Business Group	Accepted	Declined	Total all offered
Commissioner	15	20	35
Deputy Commissioner	2	9	11
Directorate of Professionalism	0	0	0
Commercial and Finance Services	3	1	4
Portfolio and Planning	0	0	0
HR Directorate	0	0	0
Specialist Crime and Operations	4	3	7
Shared Support Services	0	0	0
Digital Policing	4	1	5
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	7	0	7
Specialist Operations	5	16	21
Total	40	50	90
% of all Gifts or Hospitality Offered	44%	56%	

Table 4: Gifts and Hospitality Accepted or Declined November 2016

Management Board Principal, B/OCU, Business Group	Accepted	Declined	Total all offered
Commissioner	18	26	44
Deputy Commissioner	3	5	8
Directorate of Professionalism	0	0	0
Commercial and Finance Services	2	0	2
Portfolio and Planning	0	0	0
HR Directorate	1	0	1
Specialist Crime and Operations	7	4	11
Shared Support Services	0	0	0
Digital Policing	0	0	0
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	5	1	6
Specialist Operations	10	2	12
Total	46	38	84
% of all Gifts or Hospitality Offered	55%	45%	

Table 5: Gifts and Hospitality Accepted or Declined December 2016

Management Board Principal, B/OCU, Business Group	Accepted	Declined	Total all offered
Commissioner	13	19	32
Deputy Commissioner	1	4	5
Directorate of Professionalism	0	0	0
Commercial and Finance Services	0	0	0
Portfolio and Planning	2	0	2
HR Directorate	2	0	2
Specialist Crime and Operations	3	0	3
Shared Support Services	0	0	0
Digital Policing	0	5	5
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	1	0	1
Specialist Operations	6	6	12
Total	28	34	62
% of all Gifts or Hospitality Offered	45%	55%	

Table 6: Gifts and Hospitality Accepted or Declined January 2017

Management Board Principal, B/OCU, Business Group	Accepted	Declined	Total all offered
Commissioner	14	11	25
Deputy Commissioner	6	7	13
Directorate of Professionalism	0	0	0
Commercial and Finance Services	0	1	1
Portfolio and Planning	0	0	0
HR Directorate	2	0	2
Specialist Crime and Operations	6	0	6
Shared Support Services	0	0	0
Digital Policing	0	3	3
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	3	1	4
Specialist Operations	Awaits	Awaits	
Total			
% of all Gifts or Hospitality Offered			

Table 7: Gifts and Hospitality Accepted or Declined February 2017

Management Board Principal, B/OCU, Business Group	Accepted	Declined	Total all offered
Commissioner	Awaits	Awaits	
Deputy Commissioner	Awaits	Awaits	
Directorate of Professionalism	0	0	0
Commercial and Finance Services	0	1	1
Portfolio and Planning	0	0	0
HR Directorate	1	0	1
Specialist Crime and Operations	3	0	3
Shared Support Services	0	0	0
Digital Policing	1	3	4
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	0	2	2
Specialist Operations	Awaits	Awaits	
Total			
% of all Gifts or Hospitality Offered			

- 3.6 Analysis of the published registers for August 16, September 16, October 16, November 16, December 16, January & February 2017 indicates that the significant majority of gifts and hospitality accepted or declined by Management Board principals and senior ACPO members of staff are for gifts and hospitality relating to engagement with stakeholders, professional networks and partner agencies, attendance at conferences, working lunches, and the receipt and exchanging of ceremonial gifts. This trend is consistent with the other published Gifts and Hospitality registers over the past 18 months.

4. Equality and Diversity Impact

There are no equality or diversity issues associated with this report.

5. Financial Implications

Failure to comply with the corporate provisions of the Bribery Act 2010 could result in potential litigation costs to either the individual or organisation in the defence of any personal or corporate prosecution.

6. Legal Implications

- 6.1 Public sector organisations are under a duty to ensure appropriate arrangements are in place to minimize the risk of fraud and corruption, and demonstrate accountability to their stakeholders.

- 6.2 The publication of gifts and hospitality in accordance with the MPS Publication Scheme and reporting to the MOPAC's Audit Committee ensures accountability is maintained, and it instils public confidence in the probity of the MPS.

- 6.3 The recommendations of this report may be approved by Members, in accordance with the terms of reference of the Audit Panel which has oversight of risk management functions

7. Risk Implications

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. There are no Health and Safety implications associated with this paper.

8. Contact Details

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9. Appendices and Background Papers

None