

## AUDIT PANEL

### Friday, 22 September 2017

### MPS Gifts and Hospitality

Report by: Assistant Commissioner of Professionalism on behalf of Commissioner

#### **Report Summary**

##### **Overall Summary of the Purpose of the Report**

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 March 2017 – June 2017.

##### **Key Considerations for the Panel**

That the Panel is satisfied that the MPS operates an appropriate and transparent gifts and hospitality process.

##### **Interdependencies/Cross Cutting Issues**

This paper should be considered alongside MOPAC's gifts and hospitality report.

#### **Recommendations**

The Audit Panel is recommended to note and approve the content of this report.

## 1. Supporting Information

### Introduction

- 1.1. 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 revised policy was published in October 2016.

### Summary of Gifts and Hospitality Processes and Procedures

- 1.2. 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.
- 1.3. 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

- 1.4. 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'.*

- 1.5. 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 March 17 – June 17 is detailed in tables 1 - 4 below of this report.

**Table 1: Gifts and Hospitality Accepted or Declined: March 2017**

<b>Management Board Principal, B/OCU, Business Group</b>	<b>Accepted</b>	<b>Declined</b>	<b>Total offered</b>
Commissioner	0	0	0
Deputy Commissioner	2	5	7
Directorate of Professionalism	0	0	0
Portfolio and Planning	2	0	2
Commercial and Finance Services	1	1	2
HR Directorate	0	1	1
Specialist Crime and Operations	4	2	6
Shared Support Services	0	0	0
Digital Policing	2	5	7
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	2	2	4
Specialist Operations	7	9	16
<b>Total</b>	<b>20</b>	<b>25</b>	<b>45</b>
<b>% of all Gifts or Hospitality Offered</b>	<b>44%</b>	<b>56%</b>	

**Table 2: Gifts and Hospitality Accepted or Declined April 2017**

<b>Management Board Principal, B/OCU, Business Group</b>	<b>Accepted</b>	<b>Declined</b>	<b>Total offered</b>
Commissioner	2	3	5
Deputy Commissioner	3	1	4
Directorate of Professionalism	0	0	0
Commercial and Finance Services	2	0	2
Portfolio and Planning	0	0	0
HR Directorate	0	0	0
Specialist Crime and Operations	4	0	4
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	0	0	0
Specialist Operations	8	5	13
<b>Total</b>	<b>19</b>	<b>9</b>	<b>28</b>
<b>% of all Gifts or Hospitality Offered</b>	<b>67%</b>	<b>32%</b>	

**Table 3: Gifts and Hospitality Accepted or Declined May 2017**

<b>Management Board Principal, B/OCU, Business Group</b>	<b>Accepted</b>	<b>Declined</b>	<b>Total offered</b>
Commissioner	4	8	12
Deputy Commissioner	5	1	6
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	2	0	2
Shared Support Services	0	0	0
Digital Policing	2	5	7
Met Training	0	0	0
Directorate of Media and Communications	0	0	0
Directorate of Legal Services	0	0	0
Territorial Policing	2	1	3
Specialist Operations	8	9	17
<b>Total</b>	<b>24</b>	<b>25</b>	<b>49</b>
<b>% of all Gifts or Hospitality Offered</b>	<b>49%</b>	<b>51%</b>	

**Table 4: Gifts and Hospitality Accepted or Declined June 2017**

<b>Management Board Principal, B/OCU, Business Group</b>	<b>Accepted</b>	<b>Declined</b>	<b>Total offered</b>
Commissioner	14	16	30
Deputy Commissioner	3	9	12
Directorate of Professionalism	0	0	0
Commercial and Finance Services	1	1	2
Portfolio and Planning	0	0	0
HR Directorate	3	0	3
Specialist Crime and Operations	6	1	7
Shared Support Services	0	0	0
Digital Policing	0	0	0
Met Training	0	0	0
Directorate of Media and Communications	1	0	1
Directorate of Legal Services	0	0	0
Territorial Policing	3	1	4
Specialist Operations	3	6	9
<b>Total</b>	<b>34</b>	<b>34</b>	<b>68</b>
<b>% of all Gifts or Hospitality Offered</b>	<b>50%</b>	<b>50%</b>	

- 1.6. Analysis of the published registers for March 2017 – June 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.

**2. Equality and Diversity Impact**

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

**3. 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.

**4. Legal Implications**

- 4.1. 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.
- 4.2. The publication of gifts and hospitality in accordance with the MPS Publication Scheme and reporting to the Audit Panel ensures accountability is maintained, and it instils public confidence in the probity of the MPS.
- 4.3. 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

**5. 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.

**6. Contact Details**

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**7. Appendices and Background Papers**

None

