

 West Mercia POLICE		POLICY / PROCEDURE
Security Classification	OFFICIAL	
Disclosable under Freedom of Information Act 2000	Yes	

POLICY TITLE	Corporate Sponsorship, Gifts and Loans
REFERENCE NUMBER	WMP
Version	1.0

POLICY OWNERSHIP	
DIRECTORATE	COMMERCIAL SERVICES
BUSINESS AREA	FINANCE

INITIAL IMPLEMENTATION DATE	October 2023
NEXT REVIEW DATE:	October 2025
RISK RATING	MEDIUM
EQUALITY ANALYSIS	LOW

West Mercia Police welcome comments and suggestions from the public and staff about the contents and implementation of this policy.
Please e-mail SPIPoliciesandProcedures@westmercia.police.uk

1.0 POLICY OUTLINE

This policy deals with the acceptance of Corporate Sponsorship, which can include the acceptance by the force of corporate gifts or loans. It does not cover the receipt of gifts or hospitality given to individual members of staff on a personal basis, even where this benefit may form part of a corporate arrangement. This matter is covered in the Gifts, Gratuities and Hospitality Policy.

Sponsored vehicles are covered by the Sponsored Vehicles Policy and Procedure and as such are outside the scope of this document.

Section 93 of the Police Act 1996, provides that a local policing body (Police and Crime Commissioners – PCC's), may, in connection with the discharge of any of its functions, accept gifts, loans and commercial sponsorship.

The PCC delegates to the Chief Constable discretion to accept gifts, loans or sponsorship within the boundaries set out in this policy document. This authority has in turn been delegated to the Director of Commercial Services.

All sponsorship arrangements must have oversight from the Chief of Staff and Head of Corporate Communications and must not be entered into until approval has been received.

2.0 PURPOSE OF POLICY

The aims of the policy are to:

- Ensure the force meets all statutory requirements.
- Establish and maintain a corporate, consistent and professional approach, which is consistent to the code of ethics, when dealing with corporate sponsorship.
- Protect the force from reputational damage and financial loss arising from risks associated with Sponsorship arrangements.

3.0 IMPLICATIONS of the POLICY

Financial Regulation 5.7 governs Gifts, Loans and Sponsorship.

Gifts, loans of property, and sponsorship are defined as the voluntary provision to the force of non-public funds, services, equipment or other resources.

Corporate sponsorship, gifts and loans may only be accepted where they contribute towards the force's aims and objectives and do not breach the code of ethics. They should not be accepted where there is a risk of offending the integrity or propriety of the force.

Incidental gifts of a small value that have been given on an impromptu basis, perhaps as part of a corporate event need not be recorded, for example small promotional products bearing a company name. If there is any doubt as to whether a sponsorship

arrangement should be entered into, or a gift accepted then advice should be requested from the Financial Accounting Team.

[\(financialaccounting@westmercia.police.uk\)](mailto:financialaccounting@westmercia.police.uk)

The sponsor may or may not expect some publicity or acknowledgement in return. Where publicity is sought the matter should be referred to Corporate Communications. It is anticipated that most arrangements of this nature will have some form of commercial agreement setting out what each party can expect and their rights and obligations, therefore appropriate advice and assistance should be sought from the legal team.

This policy applies to members of the Police and Crime Commissioners office, police officers, police staff including PCSO's, members of the Special Constabulary and volunteers. The term 'officer' should be taken to include all the above categories.

There is an expectation on members of the force instrumental in putting sponsorship arrangements in place that they conduct the appropriate due diligence tests, including financial matter, company details and related companies, director check etc. Failure to comply with policy may result in disciplinary action, including dismissal where appropriate.

Under no circumstances should any corporate sponsorship, gifts or loans be accepted where they may undermine or compromise the operational independence of the Chief Constable and/or the police service.

The total value of gifts, loans and sponsorship accepted must not exceed a maximum equivalent value of 1% of the Force's annual revenue budget, which will be monitored by the Financial Accounting team.

4.0 PROCEDURE

Priority must be given to meeting the needs of the force rather than those of the sponsor. In particular, the following **must** be avoided:

- potentially sensitive associations with inappropriate sponsors
- potentially sensitive associations with companies already in a contractual arrangement to provide goods or services to the force, which could be construed by competitors as preferential treatment
- projects which could distract effort from tackling agreed priorities
- projects of dubious or limited benefit in policing terms
- offers of gifts, loans or sponsorship with conditions attached
- offers of gifts, loans or sponsorship with additional commissioning or running costs attached, where it is agreed that the force will meet additional costs, one-off or ongoing, prior to, during or after the sponsorship period, need to be fully identified, quantified and agreed.
- offers of equipment which is incompatible with force systems and policies
- where contractual conditions are inadequate for the purpose of the arrangement, and
- the risk of becoming unduly dependent on a facility liable to be withdrawn

Conditions for the Acceptance of Sponsorship, Gifts and Loans

In addition, the following issues should be addressed:

- There is an understanding, by all parties, that no additional policing rights or favours will be conferred upon any sponsor/advertiser as a result of their support.
- There is an understanding, by all parties, the force neither confers nor implies endorsement of the sponsor's goods or services.
- Projects supported by sponsorship do not divert resources from supporting operational policing.
- Reasonable steps have been taken to ensure the sponsor is of good reputation. This will involve Sponsor checks with the Force Intelligence Bureau, Trading Standards and other appropriate organisations.

An exit strategy must be prepared before the sponsorship, gifts or loan is accepted that sets out how the position will be managed when the arrangement comes to an end either naturally or in unexpected circumstances.

Undertakings, either verbal or written must not be offered or implied without appropriate authorisation and after conducting appropriate checks and investigations.

A written report must be submitted to the Head of Department (see pro-forma at [Appendix A](#)). It should provide details of the sponsor/donor, nature, value and terms of the gift/loan/sponsorship, and the period of time for which it is to be made available to the force.

The Head of Department will forward the report, with any appropriate supporting comments to the Legal Services Lead, Head of Finance and Director of Commercial Services for approval on behalf of the Chief Constable.

Sponsorship, gift or loan declined will also be recorded and notified to the Financial Accounting team and may be subject of audits and review.

Any sponsorship, gift or loan exceeding a value of £10,000 will be reported to the Treasurer to the PCC before acceptance.

The Financial Accounting Team will maintain a detailed record of all approved sponsorship agreements or gifts or loans accepted.

Sponsorship arrangements, gifts and loans will be reported in the Statement of Accounts if deemed to be material.

Any officer involved in sponsorship arrangements or the acceptance of gifts or loans must provide all necessary information to the Financial Accounting team to allow a decision regarding materiality to be made.

Heads of Department will be contacted annually prior to the completion of the Statement of Accounts to ascertain whether the sponsorship arrangements are still current, whether any terms have changed or if there are any new arrangements, gifts or loans for consideration.

5.0 CONSULTATION

<i>Business Lead Consulted</i>	<i>Date Consulted</i>
Rachel Adie	September 2023
Contracts and Procurement	15/09/2023
Corporate Communications	09/10/2023

6.0 DOCUMENT HISTORY

Date	Author / Reviewer	Amendment(s) & Rationale	Date of Approval / Adoption
30/01/17	Pippa Wilkinson	Previously approved at JNCC meeting	JNCC 10/05/2017
Se 2023	Pippa Wilkinson	Review, minor changes in light of other updated Finance policies. Added in review by the Contracts and Procurement Manager. Removal of Warwickshire text. v1.0	October 2023

7.0 ASSESSMENT AND ANALYSIS

An impact and equality assessment is available as a separate document.

8.0 MONITORING / EVALUATION

The Monitoring and review of this policy is the responsibility of the policy owner

Signature:Date:

5. Financial Accountant:

Application Supported **Yes/No** VAT Payable **Yes/No**

Comment on VAT/Budgetary implications:

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Name & Collar Number:

Signature:Date:

6. Head of Finance:

Application Supported **Yes/No**

Comment on Budgetary implications:

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Name & Collar Number:

Signature:Date:

7. Contracts and Procurement Manager:

Application Supported **Yes/No**

Comment on Contract / commercial implications:

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Name & Collar Number:

Signature:Date:

8. Legal Services Manager

Application Supported **Yes/No**

Comment on legal implications:

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Name & Collar Number:.....

Signature:Date:

9. Director of Commercial Services

Application Recommended **Yes/No**

Additional Comment:

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Name & Collar Number:.....

Signature:Date:

10. Treasurer to the PCC (for sponsorship over £10,000)

Application Recommended **Yes/No**

Additional Comment:

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Name & Collar Number:.....

Signature:Date: