

Gifts, Gratuities and Hospitality Policy



Reference number	WMP141
Version	2.3
Associated documents completed	<input type="checkbox"/> Equality Impact Assessment <input type="checkbox"/> Health & Safety and Organisational Learning Assessment
Directorate	Chief Officers
Business area	Professional Standards
Risk rating	Medium
Initial implementation date	February 2021
Most recent review date	November 2025
Next review due date	November 2027
Security classification (GSC)	OFFICIAL
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Document history/change log (newest first)

Date: **19/11/2025**
Author/reviewer: PC 3111 Neil Bennett
Amendment(s) and rationale: Document version 2.3, approved and published to SharePoint.

Date: **November 2025**
Author/reviewer: Detective Sergeant 2394 Richard Spillane
Amendment(s) and rationale: Removal of the need to seek line manager approval before entering a submission onto the register. Every offer accepted or not is to be entered on to the register. Inclusion that should an item be assessed as not acceptable then the officer needs to record what they have done with the item and update ACU, such as returned to owner or gifted to charity.

Date: **May 2025**
Author/reviewer: Detective Sergeant 2394 Richard Spillane
Amendment(s) and rationale: The reviewing of the G&H register will now be done by ACU in consultation with the Head of PSD.

Date: **April 2023**
Author/reviewer: Detective Sergeant Neil McMillan
Amendment(s) and rationale: Reviewed - minor change to 2.5, change to reduce the authority of acceptance of gifts from Chief Inspector to Inspector and in addition an explanation two stage process of accepting a gift to clear up any ambiguity. v2.1

Date: **13/07/2021**
Author/reviewer: Chief Inspector Peter Jones
Amendment(s) and rationale: Introduction of a procedure to accompany current Force Policy v1.0. Policy updated to v2.0, procedure created as v2.0, therefore there will be no v1.0 of procedure

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Date: **February 2021**

Author/reviewer: Detective Inspector Peter Jones

Amendment(s) and rationale: Reviewed – no changes, reverted to West Mercia only Policy v1.0

Date: **27/11/2013**

Amendment(s) and rationale: Previously approved at JNCC meeting.

1 Policy outline

- 1.1 This policy provides guidance to officers and staff from West Mercia Police, including members of all Staff Associations, in respect of both Police and Association business, as to the acceptance of gifts, gratuities and hospitality.

2 Purpose of the policy

- 2.1 The purpose of this policy is to provide guidance to all West Mercia Police employees (Police Officers, Police Staff, Police Community Support Officers, Special Constables, and Volunteers) on the acceptance of gifts and hospitality.
- 2.2 This guidance is necessary to ensure that:
- The actions of members of West Mercia Police will not give rise to, or foster suspicion that outside individuals or organisations have gained favour or advantage, by any member of West Mercia Police accepting gifts or hospitality from any such person or organisation, and
 - No member of West Mercia Police will accept any gift or hospitality which could cause their judgement or integrity to be compromised, either in fact or by reasonable implication, and thereby damage the reputation of West Mercia Police.
 - Any gift or hospitality, whether accepted or declined, will be recorded in the Gift and Hospitality Registry and will be subject of audits.
- 2.3 This policy has been drafted in accordance with the latest APP from the College of Policing on this subject. This guidance should be used by all officers and staff in their decision making when offered gifts, gratuities, or hospitality.
- 2.4 The APP guidance highlights that forces may wish to provide further guidance on instances where an exemption from any requirement to record may be in order, or to the extent to which discretion may be exercised. It is the position of West Mercia Police that an exemption from recording any gift or hospitality will exist where there is an impromptu and unforeseen provision of light refreshments in line with policing duties, working lunches of a modest standard during police-related business meetings, without alcoholic drinks, inexpensive promotional products from partnerships or conferences to a maximum total value of £20.00, or discounts aimed at all members of the wider police service.
- 2.5 All offers of gifts, gratuities or hospitality, accepted or declined, which do not fall within the categories as stated in 2.4 above will be recorded using the electronic register which can be found under **Sessions** from the main menu then looking up Gifts and Hospitality Register. To be clear, the acceptance of a gift is a two-stage process. The officer being offered the gift should determine if the gift should be accepted, as set out in the procedure document and then entered onto the electronic register to be assessed by the Anti-Corruption Unit. Relevant items should not be used, consumed, or treated as their own until approval/direction has been secured by the head of professional standards. If an officer or

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staff member is in possession of a gifted item waiting for assessment, they should notify their line manager that they are in possession of the item and that they are waiting for it to be assessed.

- 2.6 Should there be any doubt as to whether a gift, gratuity or hospitality should be recorded, advice should be sought in the first instance from an officer of the rank of Chief Inspector or above, or police staff equivalent, and then at least one rank above the applicant or PSD.

3 Implications of the policy

- 3.1 This policy is suitable for public disclosure.
- 3.2 The provisions of this policy are consistent with the Bribery Act 2010 and the Police Officer's Standards of Professional Behaviour, particularly that relating to Honest and Integrity, under Regulation 3 of the Police (Conduct) Regulations 2012. This standard specifically states that Police officers should never accept any gift or gratuity that could compromise their impartiality. Further, Police officers never use their position or warrant card to gain an unauthorised advantage (financial or otherwise) that could give rise to the impression that the police officer is abusing their position.
- 3.3 As with all legislation, Police Regulations must be read and given effect as far as possible in a way which is compatible with the European Convention on Human Rights. In particular, Article 8 of the Convention states that there shall be no interference with a person's private life unless:

It is in accordance with the law, and is necessary in a democratic society:

- in the interests of national security
- in the interests of public safety
- in the interests of economic wellbeing of the country
- for the prevention of disorder or crime
- for the protection of health and morals
- for the protection of the rights and freedoms of others.

This means that the restriction must be justifiable on one or more of the grounds specified above, and a proportionate means of meeting that need.

Subject to proportionality it can be said on one or more of the grounds referred to above that restrictions on the receipt of gifts, gratuities and hospitality are necessary to ensure that the police force remains effective, protects its reputation, maintains high standards of conduct and probity from its officers, and avoids any conflict of interest within their duty as a police officer or member of police staff.

- 3.4 There are no direct financial implications to the Force resulting from this policy.

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- 3.5 The procedure set out has been designed to ensure a corporate approach is adopted and to minimise the amount of additional bureaucracy by providing an electronic application by which gifts, hospitality and gratuities can be recorded.
- 3.6 There are no staffing or training implications in relation to this policy. Staff do need to be aware of the electronic recording process however, and how to access the system.

4 Consultation

Key stakeholders below have been consulted with:

- Human Resources
- Chief Officers
- Legal Services
- Police Federation/Superintendent's Association/Unison
- Professional Standards

Business lead: Superintendent Mel Paley

Date consulted: November 2025

5 Data Protection Impact Assessment (DPIA)

Is a DPIA required? Choose an item.