

## Are the Police, FARS and Commissioner's Office complying with their requirements in relation to declarations of Expenses, Gifts and Hospitality?

### What did we review and why is this important?

Although this is deemed to be a low risk area for the Police, FARS and Commissioner's Office nonetheless it is an important and at times legal function that could have a negative impact on reputation and public confidence if rules were breached.

We were asked to review the reporting requirements in relation to Expenses, Gifts and Hospitality declarations against existing statutory obligations, policies and procedures and make recommendations on the reporting requirements going forward.

The Reports are important, a breach in this area could have serious and damaging reputational consequences for the Organisations. Reporting in this manner fulfills modern force objectives. It is also good practice, enhances transparency, improves public confidence and ensures statutory obligations are met.

### How did we go about the review?

We examined and reviewed all the policy documents and procedures; we used available resources such as staff feedback to a recent wellbeing survey and we also sourced the Statutory Obligations to gain an understanding of what was required and what was being done.

We then contacted the staff responsible for ensuring that these obligations were being met and got clarification where needed. We looked at other comparable organisations to see what was published by them. We asked questions of staff arising therefrom to clarify points and increase our understanding of the processes used and observed across the organisation.

We reviewed the information we had gathered and then had second follow up conversations to get greater detail.

This was done to establish the best method of providing sufficient information in easy to read and understand language whilst maintaining all necessary obligations both procedural and in accordance with legal requirements.

### What did we find?

We found that :

- expenses reporting within the Police force, FARS and Commissioner's office is completed to a high standard
- beyond senior management there was very little reporting of any gifts and hospitality. (This may be because there was nothing to report or that people were not reporting them)
- the Gifts and Hospitality rules did not form part of any induction process for staff within the Police or Commissioners Office.

- the Police and the Commissioner's Office do not provide details of the Expenses, Gifts and Hospitality Policies when staff join though they are signposted to them.
- the Police or Commissioner's Office do not issue any regular reminders to staff in relation to Gifts and Hospitality
- the Police policy and procedure documents were dated. We understand that they are being reviewed and updated.
- FARS policy is modern, compact and easy to understand.
- FARS remind staff members via iNews articles and at prevalent times of year (e.g., Christmas- when gifts are offered at stations by members of the public) and email out reminders.
- the Commissioner's Office does not have its own policies or procedures. It utilises the Police policy and procedure document for its staff.
- the statutory reporting requirements appear to have been followed.
- ETAP receive a biannual report from the Police
- ETAP receive a biannual report from the Commissioner's office.
- The Commissioner's report is lengthy and contains detail beyond that required by its obligations, the information is unnecessary and not all relevant.
- FARS do not produce a report for ETAP; information is submitted to Finance department yearly and the register is reviewed on an annual basis.

### **What requests/advice do we have?**

We have been thorough in the examination of this area and have gained a good understanding of the processes adopted and what is being done to promote and comply with legal obligations which has resulted in the following requests:

- ❖ We would like to have sight of the new Policy and Procedure Documents being prepared by the Police and SCO.
- ❖ We would like to see information made available to staff when commencing employment regarding the policies in this area
- ❖ We would like to see more awareness and staff training in relation to the offer and/or acceptance of Gifts and Hospitality being raised throughout the organisation

- ❖ We would like the biannual reports to ETAP from Police and Commissioner's Office to continue as they comply with statutory requirements and transparency
- ❖ We would like the following proposal in relation to the Commissioner's report to be adopted :- removal of reporting in relation to Independent Custody Volunteers, Safer Neighbourhood Panels and Police Misconduct Panels/Police Appeals Tribunals as these matters are reported elsewhere.
- ❖ We would like to see a biannual Report to ETAP from FARS containing the same information as that of the Police Report for consistency and transparency.
- ❖ We would like Police and Commissioner's Office to proactively use internal communication channels to remind staff members via iNews articles and at prevalent times of year (e.g., Christmas- when gifts are offered at stations by members of the public). (We understand that this has happened in the past in relation to Covid 19 gifts)

## Response

- ❖ The Police Gifts and Gratuities policy is still subject to review. Unfortunately owing to other operational priorities, the final document is still awaited. It will however be shared when completed. The database for recording Gifts and Gratuities was due to be transitioned to a new IT system however this part of the IT transformation project has been put on hold until June 2022. Testing phase likely to be September with a 'Go live' date of December 2022.
- ❖ Learning and Organisational Development will now be including an overview of the gifts and gratuities policy in staff inductions and PSD are also covering the policy with their Student Officer inputs, Sergeants courses and driving courses in addition to any ad hoc inputs they provide.
- ❖ The Police Corporate Communications department have been tasked with sending out reminders via the intranet at pertinent times of the year such as Christmas, or when there is a force wide or national drive which may lead to the public wishing to send gifts to officers or staff members.
- ❖ FARS accepts the recommendation that it submits a biannual Report to ETAP containing the same information as that of the Police Report for consistency and transparency.
- ❖ FARS accepts the recommendation of including an awareness of the gifts & hospitality policy during the induction will be passed on to the HR Recruitment team.



<b>Follow-up actions</b>	Check progress on promotion of obligations in relation to Expenses, Gifts and Hospitality
<b>Date for further review/checking on completion</b>	March 2023 so that we can see the increase raised in staff awareness around Gifts and Hospitality and hopefully increased reporting of same.
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