Warwickshire POLICE	POLICY
Security Classification	Official
Disclosable under Freedom of Information Act 2000	YES

POLICY TITLE	**Corporate Sponsorship, Gifts and Loans**
REFERENCE NUMBER	**WP165**
Version	**1.1**

POLICY OWNERSHIP	
DIRECTORATE	Finance
BUSINESS AREA	Financial Accounting

INITIAL IMPLEMENTATION DATE	**March 2024**
NEXT REVIEW DATE:	**March 2027**
RISK RATING	**LOW**
EQUALITY ANALYSIS	**LOW**
TIER	**2**

Warwickshire Police welcome comments and suggestions from the public and staff about the contents and implementation of this policy. Please e-mail policiesandprocedures@warwickshire.police.uk

Contents

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.

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 (Police & Crime Commissioner) 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 Finance.

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 7.10 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 the 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 sought from the Finance Team through the Head of Accounting and Financial Control.

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

Team over format and content. 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 sort from the legal team.

This policy applies to all 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. Failure to comply with policy may result in disciplinary action.

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 Finance Directorate.

4.0 PROCEDURE

Conditions for the Acceptance of Sponsorship, Gifts and Loans

4.1 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
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 because 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 Unit, Trading Standards, and other appropriate organisations.

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

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

A written request must be submitted to the Head of Department. 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 approve and then forward to the Director of Finance (S.151) for approval on behalf of the Chief Constable.

The Director of Finance will seek appropriate legal advice if the sponsorship case requires it and will refer the case back to the Head of Department.

If the sponsorship, gift, or loan is declined, this will be recorded and notified to the Director of Finance and may be subject of audits and review.

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

Any sponsorship, gift or loan exceeding a value of £25,000 will be subject to approval by a Chief Officer before acceptance.

The Director of Finance 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 Director of Finance 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 DOCUMENT HISTORY

Date	Author / Reviewer	Amendment(s) & Rationale	Date of Approval / Adoption
October 2023	Mike Kaine	Updated from previous alliance policy no. A192	March 2024

6.0 CONSULTATION

Head of Dep't/ Chief Officer Consulted	*Date Communication Sent*
Director of Finance	**March 2024**

6.3 A summary of the extent of any consultation should be included here and should include details of bespoke interested groups, both internal and external, which have been involved in the development and/or consultation in respect of this policy e.g. with JNCC, Independent Advisory Group and relevant Business Areas.

7.0 ASSESSMENT AND ANALYSIS

7.1 Every policy and procedure will be subject of an Equality Analysis (EA), Health and Safety Assessment (HAS) and Risk Assessment (RA) to be completed by the policy writer, and will be referred to if requested by the reader. There is a separate template for this purpose available in the Policy Writers' Pack in the force document search page.

7.2 **It is compulsory to consult with, and receive a response from Risk Management, Health & Safety and Equality & Diversity as part of the Assessment form to be completed and also your Business Lead on every policy**