INCOME GENERATION: SPONSORSHIP AND LOANS

Owning Department: Corporate Improvement and Innovation

Governing Policy: Acceptance of Gifts and Hospitality

Department SPOC: Head of Corporate Improvement and Innovation (Suffolk) & Finance for Norfolk

Risk Rating: Medium High

Legal Sign Off: 20.08.2022 Alison Ings

JNCC: June 2021

Published Date: 21.08.2024 (v1.5)

Review Date: 21.08.2027

Index

Legal Basis

Legislation specific to the subject of this policy document:

- The Police Act 1996
- The Local Government and Housing Act 1989
- Local Government Act 2003
- Bribery Act 2010

Other relevant legislation which you must check this document against (required by law)

- Human Rights Act 1998 (in particular A.14 – Prohibition of discrimination)
- Equality Act 2010
- Crime and Disorder Act 1998
- Health and Safety at Work etc. Act 1974 and associated Regulations
- General Data Protection Regulation (GDPR) and Data Protection Act 2018
- Freedom Of Information Act 2000
- The Civil Contingencies Act 2004

Other documentation which you must check this document against:

- College of Policing – Code of Ethics
- Norfolk and Suffolk Constabularies' Standards of Professional Behaviour
- College of Policing – Authorised Professional Practice
- Financial Regulations
- 7F Commercial Services Contract Standing Orders

1. Introduction

1.1 This procedure defines the organisational approach to, and management of, income generation activities, specifically those of sponsorship and loans.

Please Note: This document should be read in conjunction with Acceptance of Gifts and Hospitality Policy.

1.2 This procedure applies to all police officers, police staff, members of the Special Constabularies, volunteers, agency staff and contractors (collectively referred to as "Staff" throughout this procedure).

1.3 Where appropriate Norfolk and Suffolk Police and Crime Commissioners (PCCs) and Suffolk and Norfolk Constabularies (the Constabularies) support the pursuit of sponsorship and loans by Staff. The following provides advice on best practice and lays down the procedures to be followed when pursuing and/or considering an offer of sponsorship or loans.

1.4 Having read this document, if a member of Staff wishes to progress an opportunity to attain sponsorship or loans, it is advised that prior to progressing this they speak with the Business Liaison Manager in Suffolk and the Finance Business Partner for Norfolk.

2. Principles

2.1 PCCs and the Constabularies may decide to accept offers of money by way of sponsorship or loan if they will enable the police either to enhance or extend the service which they would normally be expected to provide. The terms on which such offers are accepted may allow commercial sponsorship of some police force activities.

2.2 Offers of loans and sponsorship can be accepted from sources which have a genuine and well-intentioned reason for wishing to support specific projects. In return, the provider may expect some publicity or other acknowledgement. It is therefore acceptable to allow the provider to display the organisation’s name or logo on publicity material, provided this does not dominate or detract from the purpose of the project.

2.3 There is a statutory requirement to annually publish all such transactions to the satisfaction of external auditors, therefore sponsorship and loans need to be monitored, with any such activity registered with the Business Liaison Manager in Suffolk and the Finance Business Partner in Norfolk.

3. When to Accept an Offer

3.1 It is appropriate to accept an offer when:

- The donation, loan or sponsorship provided will extend or enhance a policing project or activity.
- The source has "well intentioned" reasons for wishing to support specific projects.
- The loan or sponsorship is primarily for non-core projects/activities and supports the strategic aims of the PCCs and Constabularies.

4. When Not to Accept an Offer

4.1 It is not appropriate to accept an offer when:

- Endorsement is sought in order to gain preferential treatment in supplying goods or services. (Care should be taken to ensure that others do not perceive it as seeking preferential treatment).
- The support may influence the direction of a policy or operation.

- The support is of limited benefit in policing terms.
- The support has unreasonable conditions attached.
- The support may incur additional costs for the cost centre (immediately or in the future).
- An inappropriate provider offers the support.

5. Points to Note

5.1 Priority must always be given to the needs of the Constabularies.

5.2 Care must be taken when accepting/rejecting offers from more than one organisation in a competing market.

5.3 The Constabularies must be aware of the risk of becoming dependent on support that could be withdrawn.

5.4 If the provider's logo is displayed on publicity material, it must not detract from the purpose of the supported project.

5.5 VAT must be accounted for if the Constabularies are providing clearly identifiable return or benefit. The provider must be made aware of this when discussing arrangements. This is dependent upon the additional support offered.

5.6 All loans or sponsorship opportunities must be referred to the Business Liaison Manager in Suffolk or the Finance Business Partner in Norfolk for acceptance.

5.7 Details of loans and sponsorship should only be those related to services provided by the Constabularies, e.g. support provided to a Neighbourhood Watch Scheme would <u>not</u> need to be recorded.

5.8 If in doubt about an intended loan or sponsorship, Staff should consider the questions below. Should any of the questions be answered as indicated by the *, additional advice should be sought from the Business Liaison Manager in Suffolk or the Finance Business Partner in Norfolk.

	Yes	**No**
Should the Constabulary be accepting this offer?		*
Does it fit within the force guidelines and policies?		*
Will public perception of activity be positive for the Constabulary?		*
Could it bring the Constabulary into disrepute?	*	

Have all the risks been identified and evaluated?		*
If all risks have been identified and evaluated, do the benefits to Suffolk and Norfolk Constabularies outweigh the risks?		*
Will the action supplement budgets for front line policing and provide best value for the public investment?		*
Will acceptance of the offer create additional cost and has it been accounted for? (e.g. national insurance costs, vehicle running costs etc)		*

5.9 Before a possible loan or sponsorship initiative is submitted to the Business Liaison Manager in Suffolk or Finance Business Partner in Norfolk, it is strongly advised that the loan or sponsorship activity is discussed with the Staff member’s Line Manager.

5.10 This will increase the chances of identifying any possible problems with the proposal at an early stage, avoiding disappointment or embarrassment.

6. Consultation

6.1 Specialist service managers must be consulted prior to accepting any offer to ensure that all issues have been properly identified and considered. For example, the Head of Transport should be consulted prior to all sponsorship arrangements for vehicles, and the expertise of an ICT department representative should be sought prior to entering into any arrangements relating to information technology. These specialist service managers may also be of assistance in valuing the support received.

6.2 The Business Liaison Manager in Suffolk or Finance Business Partner in Norfolk should be contacted with any queries relating to the arrangements for setting up a potential sponsorship opportunity.

6.3 The Business Liaison Manager in Suffolk or Finance Business Partner in Norfolk will submit loans or sponsorship opportunities for approval, as per the delegated limits (Section F) in Financial Regulations:

Up to £10k	Head of Finance
£10k to £50k	CC CFO
Over £50k	PCC CFO

6.4 In addition to seeking guidance from a Chief Officer for loans or sponsorship opportunities highlighted as potentially contentious, all such opportunities, regardless of value, will be discussed with the Business Liaison Manager in Suffolk or Finance Business Partner in Norfolk.

6.5 This helps ensure that all loans and sponsorship opportunities are assessed by the press coverage the opportunity may pose, as well as the integrity angle. Should the opportunity cover a specialist area, i.e. IT, the relevant member of that department will be asked for their expert advice.

6.6 The Financial Department will be contacted with any queries relating to VAT status.

7. Setting up an initiative involving a loan or sponsorship

7.1 The Business Liaison Manager in Suffolk or Finance Business Partner in Norfolk can be contacted for advice on setting up the initiative and for issues to be raised with the provider.

7.2 The VAT implications should be ascertained if the supply is VAT-able, the sponsor should be made aware that they will be receiving a VAT only invoice for the value of the supply, e.g. in the case of cars the figure will be the VAT due on an annual lease charge for the type/model of vehicle supplied. This sum can be reclaimed by the supplier through their VAT return, so there is no additional cost incurred.

7.3 Applications should include details of the need, the proposal, what the provider expects in return, how the project will be managed, the market value of any goods provided as part of a sponsorship opportunity, the time scale and how the project will end. Copies of the sponsorship application form can be obtained from the Business Liaison Manager in Suffolk or Finance Business Partner in Norfolk.

7.4 If there are any queries, either with the guidance notes or completion of documents, they should be brought to the attention of the Business Liaison Manager in Suffolk or Finance Business Partner in Norfolk.

8. Personal Liability

8.1 It is imperative that Staff follow the procedures in place when seeking or accepting loans or sponsorship. Failure to do so could result in an individual being subject to the relevant disciplinary or misconduct procedures. If a criminal offence is considered to have been committed, further action may be taken to assist in the prosecution of the offender(s).

8.2 It is vital that Chief Superintendents, Directors/Heads of Departments emphasise the importance that all forms of loan or sponsorship are brought to the attention of the Business Liaison Manager in Suffolk or Finance Business Partner in Norfolk. Failure to do so may place the individual and Constabularies at risk, should the loan or sponsorship be brought into question and require investigation at a later date.