

# Policy



<b>Notifiable Associations</b>			
<b>J-P-010</b> (previously SA016)			
<b>Version</b>	1.0	<b>Host Force</b>	Dorset
<b>Effective Date</b>	29.03.21	<b>Host Policy Unit</b>	Dorset
<b>Version Date</b>	29.03.21	<b>Policy Owner</b>	Head of Alliance Professional Standards Dept
<b>Review Date</b>	29.03.22 (TBC)	<b>Policy Author</b>	D/Inspector CCU
<b>Associated Procedures</b>	J-Pr-002		
<b>Policy Summary</b>			
<p>Devon &amp; Cornwall and Dorset Police recognises that it is legally accountable and subject to public scrutiny in respect of its delivery of policing to the three counties. Both forces also acknowledge that in order to maintain and enhance public confidence, they must create ethically robust and corruption resistant organisations.</p> <p>The Notifiable Association provisions contained within this policy and its associated procedure introduce a framework for reporting associations, which have the potential to compromise either the individual or Devon &amp; Cornwall and Dorset Police.</p> <p>This policy and associated procedure provides the framework in which staff; their supervisors and the organisation itself can make sensible determinations based on the individual circumstances of each case.</p> <p>Devon &amp; Cornwall and Dorset Police recognises there is a risk of some staff associating with inappropriate persons, groups or organisations. It is important that staff understand the directives (contained within this policy and procedure) to be observed to ensure that no doubt is cast on the integrity of Devon &amp; Cornwall and Dorset Police.</p>			

Please note this policy and its associated procedure replaces Alliance document SA016.

We welcome any comments or suggestions you wish to share about the content or implementation of this policy. If you would like to make contact to discuss further, please email: [Policies@dorset.pnn.police.uk](mailto:Policies@dorset.pnn.police.uk) or [ForcePolicyandProcedures@devonandcornwall.pnn.police.uk](mailto:ForcePolicyandProcedures@devonandcornwall.pnn.police.uk)

## **1. Purpose, Standards and Legal Basis**

**1.1** Both Devon & Cornwall and Dorset Police expect their staff to maintain the highest standards of professional conduct. This includes Police Officers, Police Staff, members of the Special Constabulary, and Volunteers. The procedure takes its legal basis from the following principles:

- The Police (Conduct) Regulations 2020 for Police Officers.
- The conditions of employment for Police Staff.
- The principles of ECHR and the Human Rights Act namely; legality, legitimacy, proportionality, necessity and accountability.
- Force Integrity Programme.

**1.2** Devon & Cornwall and Dorset Police acknowledges:

- The rights of its staff to respect for private and family life afforded by Article 8, Human Rights Act 1998.
- The rights of its staff to Freedom of Expression afforded by Article 10, Human Rights Act 1998.
- The rights of its staff to Freedom of peaceful assembly and to Freedom of association afforded by Article 11, Human Rights Act 1998.
- The rights of its staff to marry afforded by Article 12, Human Rights Act 1998.

**1.3** The existence of these articles does not prevent the imposition of lawful formalities, conditions, restrictions or penalties on the exercise of these rights by citizens, including officers and staff of Devon & Cornwall and Dorset Police which may be necessary for a number of reasons to prevent the work of the forces being undermined and in particular:

- For the prevention of crime and disorder
- For the prevention of the disclosure of information received in confidence
- For the protection of the reputation or rights of others

**1.4** Both Forces are obliged to abide by all relevant UK and European Union legislation. The Forces shall comply with the following legislation and other legislation as appropriate:

- The Data Protection Act (2018) and General Data Protection Regulations (GDPR)
- The Health and Safety at Work Act (1974)
- Human Rights Act (1998)
- Freedom of Information Act (2000)
- Equality Act (2010)
- Authorised Professional Practice
- National Decision Model
- Visions, missions, values
- Equality and diversity issues including the Public Sector Equality Duty, Code of Ethics and Standards of Professional Behaviour

**1.5** The College of Policing (CoP) offers an online service that provides access to a consolidated body of guidance for policing called Authorised Professional Practice (APP). This enables officers and staff to access and search for the most up to date approved guidance, replacing a number of previously published NPIA and ACPO documents. The relevant APP guidance concerning notifiable associations is contained within the counter corruption APP which is only available to those officers and staff who work specifically within the area of counter corruption.

**1.6** All records created as a result of this policy will be retained in accordance with existing legislation and J-P-011 - [Records Management Policy](#)

## **2 Roles and Responsibilities**

**2.1** Police Officers, Police Staff, Members of Special Constabulary and Volunteers are expected to maintain highest standards of professional conduct.

**2.2** Line Managers – in place to receive first report of an ‘association’ and to ensure a Notifiable Association Form is completed (Appendix A – J-Pr-002) and forwarded to the Counter Corruption Unit (CCU).

**2.3** CCU – responsible for facilitating the reporting and investigation of any Notifiable Association forms received and the management of any subsequent Association Agreements.

**2.4** Head of CCU will ensure -

- All reports of alleged notifiable associations are recorded and fully assessed.
- That decisions made on reports are done with fairness, proportionality, adherence to policy and procedure and that no police business is compromised.
- Individuals are informed of the decision and advice / restrictions are appropriate to the circumstances.
- Appeals are forwarded to the Deputy Chief Constable.

- Misconduct enquiries are commenced where appropriate.
- Collate, analyse and disseminate intelligence where appropriate.
- Keep the person who has made the report updated (where appropriate).

#### **2.5 The Vetting Unit will**

- Ensure any reportable association is brought to the attention of the CCU.
- Where appropriate, conduct an integrity interview, which may involve the service of an Association Agreement (in conjunction with the CCU).
- Consider and decide whether the reportable association in any way affects the current vetting clearance of the individual.

### **3 Policy Information**

**3.1** This policy and its associated procedure is supported by The Strategic Assessments on Corruption produced by the National Crime Agency. These have highlighted that the main threat to the organisation in terms of corruption is that of criminal association leading to disclosure of intelligence. This in turn causes vulnerability to wider corruption, operational compromise and a loss of public confidence. The HMIC Integrity Inspection also recommends Association Declaration.

**3.2** Schedule 2 to the Police (Conduct) Regulations 2020 sets out 'Standards of Professional Behaviour' for police officers. Standards of Professional Behaviour have also been issued for police staff. The Code of Ethics reiterates these standards for all who work in policing and includes warranted officers, police staff, volunteers and contractors. Under the heading 'Honesty and Integrity', it states that all who work in policing will be honest and act with integrity and will not compromise or abuse their position. Further, that they should always consider carefully the risk of becoming improperly beholden to a person or organisation. Under the heading 'Orders and Instructions' it also states that police officers will abide by police regulations, force policies and lawful orders. It goes on to say that everyone working in policing must carry out reasonable instructions and follow force policies.

**3.3** This policy and its associated procedure provide comprehensive guidance and outlines the framework for reporting associations.

### **4 Monitoring and Review**

**4.1** Review and amendments will be coordinated by the Policy Unit.

**4.2** The policy owner has overall responsibility for ensuring the content of the policy is appropriate and up to date.

**4.3** This policy will be reviewed subject to legislation/process changes in accordance with the Equality Impact Assessment.

4.4 This policy and its associated procedure will be monitored by the Alliance Professional Standards Department.

4.5 Feedback relating to this policy can be made in writing or by e-mail to

[Professional Standards Department](#)

## 5 Associated Documents

- [Misson & Values](#) (D&C pages)
- [Values](#) (Dorset pages)
- [Human Rights Legislation](#)
- [Records Management](#) (D&C page)
- [Records Management](#) (Dorset)
- [FOIA](#)
- [GSC](#)
- [GDPR/DPA 2018](#)
- [National Decision Model](#)
- [Code of Ethics](#) (D&C page)
- [Code of Ethics](#) (Dorset Page)
- Police Staff Council Standards of Behaviour
- [Standards of Professional Behaviour](#)
- [Authorised Professional Practice \(APP\)](#)
- J-Pr-002
- [The HMIC Integrity Inspection](#)
- [The Startegic Assessments on Corruption](#)
- [Police \(Conduct\) Regulations 2020](#)

## 6. Document History

<b>Present portfolio holder</b>	Head Of PSD
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<b>Present document owner</b>	D/Inspector CCU
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<b>Present owning department</b>	Alliance PSD
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**Below details required for version 1.0 and major amendments only**

<b>Name of board</b>	
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<b>Date approved</b>	04.03.21
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<b>Chief Officer approving</b>	DCC Chiltern
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## 7. Version History

Version	Date	Reason for Amendments	Amended by
1.0		Initial document following fit for purpose review resulting in significant changes requiring consultation. Transference to new Joint Template.	Supt PSD/The Legitimacy Team