

Policy



Notifiable Associations

URN: J-P-010

Version: 1.2
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Host Force: Dorset Police (DP)
Host Policy Unit: Dorset Police Legitimacy Team
Policy Owner: Head of Alliance Professional Standards
Policy Author: Counter Corruption Unit D/Inspector

Associated Procedure: J-Pr-002 – Notifiable Associations Procedure

1. Policy Summary

Devon & 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.

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 & Cornwall and Dorset Police.

This policy and associated procedure provides the framework in which members of the police service; their supervisors and the organisation itself can make sensible determinations based on the individual circumstances of each case.

Devon & 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 & Cornwall and Dorset Police.

2. Purpose, Standards and Legal Basis

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 as amended by The Police (Conduct) (Amendment) Regulations 2024
- 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.

Dorset Police and Devon & Cornwall Police acknowledge:

- 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.

The existence of these articles does not prevent the imposition of lawful formalities, conditions, restrictions or penalties.

Laid out in this policy, which are necessary to prevent the work of Devon & Cornwall and Dorset Police being undermined. This policy is designed to:

- Prevent crime and disorder
- Prevent inappropriate disclosures
- Protect the trust and confidence that our communities hold in us

Both Forces are obliged to abide by all relevant legislation and other guidance as appropriate:

- Authorised Professional Practice (APP)
- Code of Ethics
- Equality Act (2010)
- Freedom of Information Act 2000 (FOIA)
- Home Office Statutory Guidance on Professional Standards, Performance and Integrity in Policing
- Human Rights Act (1998)
- Independent Office for Police Conduct (IOPC)

- National Decision Model
- Public Sector Equality Duty
- Standards of Professional Behaviour
- The Data Protection Act (2018) and UK General Data Protection Regulation (GDPR)
- The Health and Safety at Work etc. Act (1974)
- Visions, Purpose & Priorities
- www.gov.uk

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 NPJA 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.

All records created as a result of this policy will be retained in accordance with existing legislation and the Joint Records Management Policy (J-P-011).

3. Roles and Responsibilities

This policy is to be read in conjunction with the associated Notifiable Associations Procedure, which provides additional explanation to the terms used below.

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

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

The Counter Corruption Unit are responsible for facilitating the reporting and investigation of any Notifiable Association forms received and the management of any subsequent Association Agreements.

The Head of CCU will ensure:

- All reports of alleged notifiable associations are recorded and fully assessed.
- Decisions made on reports are done with 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.
- Handle intelligence appropriately
- The individual making the report is kept updated (where appropriate)
- The individual making the report is kept updated (where appropriate).

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.

4. Policy Information

This policy and its associated procedure is supported by The Strategic Assessments on Corruption produced by the National Crime Agency. These assessments have highlighted that a key threat to policing is that of criminal association leading to the 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.

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.

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

5. Monitoring and Review

Review and amendments will be coordinated by the Policy Unit.

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

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

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

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

6. Associated Documents

Policy and Procedure

- J-Pr-002 – Notifiable Associations Procedure
- J-P-011 – Joint Records Management Policy

SharePoint

- Code of Ethics (DCP)
- Code of Ethics (DP)
- Records Management (DCP)
- Records Management (DP)
- UK General Data Protection Regulation / Data Protection Act (2018)
- Vision, Purpose & Priorities (DP)
- Vision, Purpose & Priorities (DP)

College of Policing

- Authorised Professional Practice (APP)
- National Decision Model

Other

- Equality Act (2010) (as amended)
- Freedom of Information Act 2000 (FOIA)
- Home Office Statutory Guidance on Professional Standards, Performance and Integrity in Policing
- Human Rights Legislation
- Independent Office for Police Conduct (IOPC)
- Police Conduct Regulations (2020)
- Standards of Professional Behaviour (DCP)
- Standards of Professional Behaviour (DP)
- The HMIC Integrity Inspection
- The Strategic Assessments on Corruption
- www.gov.uk

7. Document History

Present Portfolio Holder:	Deputy Chief Constable
Present Document Owner:	Alliance Head of Professional Standards
Present Owning Department:	Alliance Professional Standards

8. Version History

Version: 1.0
Date: 29/03/2021
Reason for Amendments: Initial document following fit for purpose review, resulting in significant changes requiring consultation. Content transferred to new policy template.
Amended by: Head of Professional Standards
Quality Assured: Legitimacy Team

Version: 1.1
Date: 20/10/2023
Reason for Amendments: Annual review completed – no changes made.
Amended by: Vetting & Counter Corruption Unit (CCU) Teams.
Quality Assured: Legitimacy Team

Version: 1.2
Date: 01/11/2024
Reason for Amendments: Annual review completed whereby minor wording changes made to ensure clarity. Links also updated throughout policy.
Amended by: Head of Professional Standards
Quality Assured: Legitimacy Team

We welcome any comments or suggestions you wish to share about the content or implementation of this procedure. If you would like to make contact to discuss further, please email Policies@dorset.PNN.police.uk or Forcepolicyandprocedures@devonandcornwall.pnn.police.uk