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Section 1 – Policy Intentions

The purpose of this policy is to safeguard the integrity of individual officers and staff and to prevent actual or perceived compromise to operations and intelligence.

This policy is intended to provide guidance to members of the Organisation who, through the course of their daily lives, come into contact with individuals with whom the association may cast doubt onto their integrity as to why that relationship exists. Or the association may undermine the confidence of the communities that we serve.

Section 2 – Policy wording

It is accepted that members of the Constabulary are drawn from society and are representative of it. Some staff will inevitably maintain associations with individuals who have come to police notice before. There are occasions where such an association may mean that staff become at risk of having their integrity called into question or of damaging the reputation of the Organisation and public confidence in Gloucestershire Constabulary.

This policy applies to all police officers and police staff, all members of the special constabulary and all volunteers. **It also applies to the Office of the Police and Crime Commissioner.** The term employee used within this policy should be taken to include all those in the above named groups.

Where an employee suspects or becomes aware of an association that may make them personally vulnerable they should consider this policy and if necessary notify the Anti-Corruption Unit (ACU), as per the procedure section of this policy.

All employees who know or suspect that another person may be vulnerable as a consequence of an association and have cause to think the association has not been reported to the Organisation, must report the association into the ACU as per the procedure section of this policy.

System checks should never be made to check a belief or suspicion that a person may have had contact with the police. There is no exemption from the Data Protection Act 1998 in relation to force employees accessing information to determine whether an association requires declaration.

A notifiable association includes the following:

- Persons with unspent criminal convictions
- Persons charged with a criminal offence where the matter remains unresolved
- Persons known to be under investigation for, but not yet charged with, a criminal offence
- Persons who are the subject of criminal intelligence or who are of interest
- Persons dismissed or required to resign from police service or other LEA (Law Enforcement Agency)
- Former law enforcement officers now working in an investigative role (e.g. private investigators and legal firms)
- Television, print and online journalists
- Individuals who are members of or have associations with extremist groups

This list is not exhaustive and there should always be early conversations with the ACU or the PSD department if there is any doubt. An association should always be reported rather than not being reported so that an assessment can be made.

Association has its normal everyday meaning in this context i.e. meeting or uniting for a common purpose, keeping company or being familiar with, being an ally, confederate, partner, colleague, having a friendship, intimacy or connection, being a member of a group, organisation or society which is formed for the promotion of a common objective or aims.

This includes associations via social media.

Notifiable associations should not include individuals with whom the officer or staff member has a purely professional on duty relationship. The term association is not intended to include a person with whom a staff member knows casually, or has a chance meeting with occasionally.

It is not the intention of this policy to unnecessarily restrict employees right to privacy and any decision making will be undertaken in a lawful, proportionate and reasonable manner.

Failure to report an association that may make an employee and/or the organisation vulnerable may render that employee subject misconduct or discipline procedures.

Section 3 – Procedural guides

Employees who are aware or suspect that such an association exists should complete the Notifiable Association Form, Appendix A.

Prior to completion advice may be sought from a supervisor, the Police Federation, the Superintendents Association or Unison.

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All disclosures will be managed in confidence and employees can take the opportunity to have a discussion with the ACU prior to submission should that assist them.

When completed the form should be electronically sent to the ACU inbox.

If you become aware of an association concerning someone else, there is the option to let the ACU know via the [ACS \(Anonymous Contact System\)](#) or via the [Crimestoppers Integrity Hotline](#).

When the form has been received a decision will be made as to whether system checks will be conducted to assess the vulnerability.

Staff should be aware that any information that they disclose in relation to ongoing criminal activity may result in consideration of further investigation and action being taken.

Any identified vulnerable associations may be reviewed by the ACU. During the course of the review a vulnerability interview may be required. This interview is to establish more information around the association and clarify details of any initial notification. It is not a formal process, rather an opportunity for the reviewing of information in order to ensure an accurate and detailed assessment can be made. The individual employee will be entitled to support and advice from their relevant staff association or Unison representative.

At the conclusion of this process the ACU will provide a report to the Head of Professional Standards outlining the circumstances of the association and a risk assessment score based on a matrix supplied by the NCA.

At the conclusion of the review the employee will be informed whether the association is deemed appropriate by the Head of PSD.

If the determination is that the association may make the employee and/or the organisation vulnerable, then they will be advised of restrictions that are intended to minimise the vulnerability or that their association must cease.

Any notification may result in the information being shared with the Vetting Department for their consideration.

Where the employee seeks to appeal against the determination made by the Head of PSD, they should submit an appeal in writing to the The Chief Officer with the delegated authority from the Chief Constable as the Appropriate Authority (AA) within 14 days from receipt of the determination.

Any appeal must identify why the member of staff disagrees with the determination. Advice and support will be available from the member's staff association or Unison who may make their written representations within the document.

All appeals to the should be made via the Head of PSD. The appeal will be considered within 28 days of receipt.

Whilst subject to an appeal process, the employee will be informed of any direction to restrict the association.

The AA will chair a strategy meeting to discuss the association with any parties the AA considers appropriate to attend.

At the commencement of that meeting the employee submitting the appeal may be given the opportunity to make personal representations during which they may be accompanied by a colleague or staff association representative. The AA may then ask them to leave the meeting during the decision making process.

The AA may on review decide to uphold the appeal, confirm the determination given in relation to the association or vary its conditions.

Subject to a determination in relation to a vulnerable association having been served on any employee and the appeal process having been exhausted, any failure to comply with the determination may result in the individual being made subject to misconduct or discipline procedures

Section 4 - Relevant Legislation: (*Human rights/diversity/Health & Safety/any other specifics*)

List/link any relevant papers to be considered – Free text

[Link to Human Rights](#)

[Code of ethics](#)

[Police Code of Conduct](#)

[Staff regulations/police staff handbook](#)

[Police amendment regs 2014](#)

[Police regs 2003](#)

Section 5 - Related References:

List/link any relevant papers to be considered – Free text

[ACS \(Anonymous Contact System\)](#)

[Crimestoppers Integrity Hotline](#)

Section 6 - Identification, Monitoring and Review

The Policy should enable consistent and effective decision making. Where operational or managerial circumstances require any decision making that would adversely affect adherence to the policy or procedure, in line with the 'Statement of Intent' of the constabulary and the police service 'Code of Ethics', if an officer/ police staff member believes that they need to make a decision that steps outside of policy and procedure they should do so, provided that:

- the officer/ police staff member raises the matter at the earliest opportunity (and ideally before any such decision is made) with their line manager declaring their intended (or actual) course of action if notification is made after the decision is taken,
- produces, in a timely manner, a signed and dated written explanation of why it is/ was deemed necessary to step outside of policy and procedure, and
- maintain an adequate record of this written rationale for audit purposes appropriate to the circumstances/ contravention

Appendix A

[Notifiable Association Report Form](#)

GSC Security Marking:		OFFICIAL/OFFICIAL-SENSITIVE	
Type		Policy	
Department		URN	Strategic Board 'signed off'
		<i>Obtain from G&C team</i>	<i>IGB – include date signed off</i>
		DI Jo Mercurio	
Version	Date	History of changes (ensure public copy amended and uploaded to external website)	
Version 1	2015	New template created	
Version 2	Aug 2017	New corporate heading and official marking & decision making wording added	
Version 3	April 2018	Name change to policy throughout to fit in with the NPCC and to make the need to report such associations clearer.	
Formatting and Publication:		Governance and Compliance Team	
Next Document Review Date:			
EIA		EIA Sign Off – name and date	EIA Review – name and date
LOW K:\Waterwells\Equality Impact Assessment\Notifiable Associations Policy EIA April 2018.doc			
Link to EIA – G&C to complete hyperlink action			
SIA – if required		SIA Sign Off	SIA Review
<i>FREEDOM OF INFORMATION - This version will be placed on the public domain website</i>			
<i>If this version <u>CANNOT</u> be placed on the public domain website, please provide a FOI redacted version.</i>			

Previous policies can be found with the Governance and Compliance team.