
WILTSHIRE POLICE FORCE POLICY and PROCEDURE



Reportable Associations

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POLICY STATEMENT

The purpose of this policy is to safeguard the integrity of Individual officers and Staff, and to prevent actual or perceived compromise to operations or intelligence belonging to Wiltshire Police or other law enforcement agencies.

Wiltshire Police recognises that identifying associations between members of Wiltshire Police and the public is a key measure in protecting the integrity of the Force, preventing corruption and the opportunity for corruption. Public confidence relies on the integrity of the Force and is linked directly to one of our organisational principles that we will build upon public approval and confidence in Wiltshire Police, as well as our stated Force values of Integrity and Impartiality.

Wiltshire Police expects its entire staff to maintain the highest standards of professional conduct. It is therefore the responsibility of all staff to declare associations, with individuals or groups, that may impact upon public confidence, be perceived to compromise their integrity or adversely affect the ability of staff to carry out their duties in a manner that is lawful, fair and impartial.

This policy underpins the Reportable Association Procedure which identifies the circumstances and process in which a member of Wiltshire Police is required to report an association.

POLICY AIM

This policy is intended to:

- Lay out an ethical framework for all Wiltshire Police employees and third parties, which clearly identifies inappropriate associations and relationships, outlines staff responsibilities relating to intelligence, enforcement and prevention and gives clear guidance and support.
- To highlight to all employees and third parties the risks involved in becoming improperly beholden to those outside the organisation and the vulnerability such associations pose.
- Manage the risks presented to and prevent the compromise of, individuals and the organisation by inappropriate associations.
- Identify deliberate attempts by criminal elements who would benefit in any way from corrupting, manipulating or placing unnecessary or unwarranted pressures on members of Wiltshire Police and to protect members of Wiltshire Police from those criminal elements.
- Protect the most vulnerable people in society from inappropriate behaviour by Wiltshire Police employees.
- Maintain high standards of professional behaviour with employees who act with honesty and integrity, thus protecting the reputation of Wiltshire Police and the confidence the public have in it.
- To preserve the operational effectiveness of Wiltshire Police.

APPLICABILITY

This policy applies to all Police Officers, Police Staff, Special Constabulary and Volunteers. While this policy may not apply to third Party personnel, they should be made aware of their responsibility to comply with the principles enshrined in the Code of Ethics.

LEGAL BASIS AND DRIVING FORCE

This policy is aligned to the College of Policing Code of Ethics and HM Governments [UK Counter-Corruption Strategy 2017-2022](#). These have highlighted that one of the main threats 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.

This policy and the procedure takes its legal basis from the following principles:

- Criminal Justice and Courts Act 2015 (s26)
- The Police (Conduct) Regulations 2020 for Police Officers.
- The conditions of employment for Police Staff.
- The principles of ECHR namely; legality, legitimacy, proportionality, necessity and accountability.
- Code of Ethics
- Vetting Codes of Practice

RELATED POLICIES, PROCEDURES and OTHER DOCUMENTS

Wiltshire Police Values

[College of Policing Code of Ethics](#)

NPCCAG Abuse of Position for a Sexual Purpose strategy

[Acceptable Use of Force Systems Policy](#)

[Acceptable Use of Email, the Internet and Fixed and Mobile Telephones Policy](#)

[Business Interests Policy](#)

[Information Security Policy](#)

[Gifts and Hospitality Policy and Procedure](#)

[Reporting Wrongdoing Policy](#)

[Ethical Interviews Procedure](#)

AUTHORISED PROFESSIONAL PRACTICE

[Professional Standards > Counter Corruption](#)

DATA PROTECTION

Any information relating to an identified or identifiable living individual recorded as a consequence of this policy and procedure will be processed in accordance with the Data Protection Act 2018, General Data Protection Regulations and the Force [Data Protection Policy](#).

FREEDOM OF INFORMATION ACT 2000

This document has been assessed as suitable for public release.

MONITORING AND REVIEW

The Counter-Corruption Unit will maintain data in relation to members of Wiltshire Police and individual's subject of this policy and associated procedure. This will be treated confidentially, stored securely in line with the Data Protection Act 2018/General Data Protection Regulations and Data Protection Policy and will not be available on the Force wide system.

Feedback on the content of the policy from policy users, will be used to monitor the efficiency and effectiveness of the policy and associated procedure.

This Policy and Procedure is owned by the Professional Standards Department. The Head of the Professional Standards Department will ensure that this policy is reviewed annually.

WHO TO CONTACT ABOUT THIS POLICY AND PROCEDURE

Professional Standards are responsible for this policy. Contact can be made with the department by the following means – Email: ProfStand@wiltshire.police.uk

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REPORTABLE ASSOCIATION PROCEDURE

1. AIM OF PROCEDURE

This procedure is a preventative and supportive measure for all members of Wiltshire Police and places an obligation on all staff to question the appropriateness of relationships with certain defined individuals, groups or organisations that MAY be perceived to compromise the individual staff member's integrity, impact on operational effectiveness or otherwise damage the reputation of Wiltshire Police.

Wiltshire Police relies on the honesty and integrity of its staff. As public servants, all members of Wiltshire Police are expected to observe the highest standards of professional conduct, in both their private lives and their employment. The community must have trust and confidence in Wiltshire Police to conduct its duties and execute its powers fairly and impartially without the pressures of external influence or bias and to protect the most vulnerable in our society.

The Reportable Association Policy underpins Wiltshire Police's commitment to the Code of Ethics and Standards of Professional Behaviour which clearly define the high standards expected by the public of the whole police family.

There is a mandatory obligation to declare any personal relationships with a member of the public that develops as a result of initial contact made during the course of operational policing (or any other work conducted on behalf of Wiltshire Police), that **could be perceived** as an abuse of position or effect impartiality. Staff should disclose any such relationships to their manager or CCU without delay so that an assessment can take place.

In practice, the vast majority of staff behave with complete integrity; however, it is recognised that there is a risk of some members of Wiltshire Police associating with inappropriate persons, groups or organisations or initiating or encouraging inappropriate relationships with vulnerable individuals.

It is important that everyone understands the policy and procedure to protect members of the public and ensure that no doubt is cast on the integrity of the individual or Wiltshire Police.

2. EXPLANATION OF AN ASSOCIATION REQUIRING DECLARATION

Only associations where you have a **personal relationship** with an individual or group require declaration. This would include a person you are related to, a person you would regard as a friend or someone you have planned social meetings with on a regular basis.

It should be noted that an association need not necessarily involve face to face meetings. A personal relationship where contact is made using the internet or telephony system in the form of conversation, written messages and/or pictures (whether moving or still images) will still constitute an association.

An association does not include a chance meeting. This is defined as an unplanned meeting with an acquaintance who you will only acknowledge, albeit this may be a regular occurrence.

An association also does not include individuals with whom the officer or staff member has a purely professional, on duty relationship; or personal relationships with other serving members of the Police Service.

3. CRITERIA FOR AN ASSOCIATION REQUIRING DECLARATION

You MUST report an association with an individual or group where you know or reasonably believe that the person(s) concerned fall into the following categories;

- Known to have a criminal conviction(s) (Non recordable offences – for example: speeding, do not apply).
- Charged with a criminal offence and subject of a current prosecution.
- Known to be subject to a criminal investigation but not yet charged.
- Subject of criminal intelligence or subject of an interest marker.
- Have been dismissed following disciplinary proceedings or required to resign from a police service or other law enforcement agency. The obligation under this category does not apply to representatives of Staff Associations who have contact with the dismissed person as a legitimate part of their role as a Staff Representative.
- Former police officers or other law enforcement officers who are working in a related field of employment outside the organization or other law enforcement agency: for instance a former Police employee who has resigned or retired from the Police Service and obtained a position within a law firm.
- Private investigators, regardless of any specialism or whether they are licenced and/or registered. This includes individuals or groups acting as vigilantes (claiming to act in the public interest for no monetary gain), for instance an OCAG (Online Child Sexual Abuse Activist Group).
- Personal relationships with representatives or other employees of any legal firm or independent legal representatives, regardless of specialism in civil or criminal law.
- Personal relationships with media representatives, with the exception of media contact that can be reasonably be expected as a normal part of your job description.
- Intimate relationships with any members of the public where contact was established for a policing purpose or on police business (even where the contact for a policing purpose has now ceased). This would include situations where a member of Wiltshire Police forms a sexual relationship or a close friendship that could be seen as sexually motivated, with a current or former informant, a case officer with a victim or witness in a current or closed case or a Family Liaison Officer with a member of the deceased's family.

There is no definitive list of Reportable Associations; however, this policy gives numerous examples throughout.

The criteria used is whether it would be obvious to a reasonable person that an association requires reporting.

It is a matter for the individual viewing this policy to decide whether they should disclose information whilst bearing in mind the duty imposed upon all members of Wiltshire Police in this regard. If in doubt or if further guidance is required, contact should be made with CCU as soon as practicable: CCU@wiltshire.police.uk

4. DEFINITIONS

Personal Relationship - A close friendship or intimate relationship with a member of the public which develops above and beyond what is necessary as part of the role as a representative of Wiltshire Police.

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This could include meeting or uniting for a common purpose, keeping company or being familiar with, being an ally, confederate, partner or 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 aim.

Inappropriate Association - Any association will be deemed inappropriate if the personal relationship or involvement with an individual, group or organisation has the potential or is likely to:

- Compromise the individual member of Wiltshire Police, or
- Compromise the operation of Wiltshire Police, or
- Compromise the reputation of Wiltshire Police, or
- Undermine public confidence in Wiltshire Police.

There is no definitive list of associations which will be deemed inappropriate; this is a matter for the individuals following the procedure to determine.

An association with persons with criminal convictions (including convictions for criminal offences under the Road Traffic Act) and / or where intelligence exists relating to current or recent criminal activities, may be considered as inappropriate and so, must be disclosed. There will be a greater emphasis on unspent convictions and each will be considered on a case by case basis.

Staff should be aware that any intimate relationships formed with members of the public after initial contact was made for a policing purpose could be seen as an abuse of position of trust or authority and therefore could be deemed inappropriate, in particular if the member of the public is vulnerable.

Vulnerability - There is no exhaustive list of vulnerabilities; this is a matter for the individuals following the procedure to determine. However, with regard to a member of public, vulnerability could be temporary or short term, long lasting or permanent and may include:

- Mental or physical disability and illness
- Learning disability
- Addiction issues
- Age
- Victim, witness or suspect in crime or crime related incident (in particular domestic abuse)
- Recent bereavement

Group or Organisation - There is no definitive list of groups or organisations deemed inappropriate. This is a matter for those following the procedure to determine but will include Membership of the Combat 18 and the National Front as prohibited by force policy.

In addition, this could include:

- Membership by a police officer of any political party where membership involves the officer playing an **active part** in politics in contravention of Police Regulations (to play an 'active part' in a group or organisation, would involve an individual assisting (or attempting to assist) in furthering the group or organisation's political aims by way of words or acts. One would ordinarily have to do more than simply 'follow' a political person, group or organisation on social media).
- Association with groups or organisations involved in law breaking or criminal activity such as certain animal rights groups, football hooligans, etc.

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- Association with groups or organisations which would bring the force into disrepute. This could include, but is not limited to, racist groups, activist groups or extremist groups with aims which contravene the statement of common purpose and values of the Police Service or the intent or effect of any relevant legislation or policies governing Wiltshire Police.
 - Association with groups or organisations which advocate either active or passive non-compliance with the law.

Compromise – In the context of this procedure, compromise includes the likelihood or potential of both actual and/or perceived risk to the individual staff member, operations or reputation of the force and can include the following:

- Place in a position of difficulty or danger
- Expose to risk of failure; frustration or disgrace
- Cast doubt on one's integrity.

An example of compromise could be leaking of information, whether deliberate or not, that would 'tip off' a criminal individual or organisation prior to the execution of a search warrant.

A further example would be the disclosure of personal or private lifestyle details of other members of Wiltshire Police to outside individuals or organisations that may allow targeting of officers and staff by way of assault, harassment, fraud, extortion or public humiliation.

5. INFORMATION SECURITY

There is NO EXEMPTION under the Data Protection Act 2018/GDPR, Data Protection Policy or Wiltshire Police Information Security Policy in relation to assessing information to determine whether an association requires declaration.

Officers and staff must never access or disclose any information that is not in the proper course of police work. Employees who undertake checks on associates using force wide computer systems are liable to prosecution under the Data Protection Act and may face disciplinary action for gross misconduct.

6. REPORTING OBLIGATION

It is the responsibility of all members of Wiltshire Police to declare reportable associations to Wiltshire Counter-Corruption Unit (CCU) at the earliest opportunity. This applies irrespective of whether these associations have previously been declared as part of any security clearance or vetting procedures.

Employees that have concerns about an association they have should always err on the side of caution and seek advice from either their line manager or CCU.

7. REPORTING PROCESS

Submissions should be made electronically using the Reportable Association Notification form which is available on the [PSD Portal page](#) or from CCU. Prior to completion, staff should, as a minimum, inform their Line Manager without delay via email that they intend to submit a Reportable Association Notification form. In doing so, an auditable email trail is formed that allows the Line Manager to follow up with CCU to ensure the form has been submitted correctly.

Once complete, the Reportable Association Notification form should be sent as soon as practicable via email to the CCU@wiltshire.police.uk

Where the association is believed to fall under the remit of this policy, the contact with the individual should be kept to an absolute minimum until it has been reviewed by CCU and appropriate control measures agreed.

A declaration of a reportable association will not necessarily prohibit any particular associations but will require a determination as to the threat and suitability of such an association.

It must be stressed that the policy only applies to those associations that could reasonably have been known to the individual.

Nothing in this policy endorses checks or enquiries to be made into the status of possible associations (including through the CCU) in order to establish if this policy applies.

Under no circumstances should the individual concerned use police systems to check their associates or ask or seek to coerce their colleagues into doing so on their behalf.

8. OBLIGATION RE. CHANGES IN CIRCUMSTANCES

Any changes to existing reportable associations in terms of frequency, type of contact and the changes in the activities of the associate should be reviewed and reported to CCU as soon as practicable via the Reportable Association Notification form after the individual has notified their line manager by email.

Reportable associations should be discussed with Line Managers on a routine basis as part of the PDR process and one-to-ones as part of an 'Integrity Health Check'.

9. THIRD PARTY REPORTING

Where a member of staff becomes aware of, or suspects, an association or inappropriate relationship between another staff member and an individual, group or organisation, which may be inappropriate, they should report this to CCU either directly or via their supervisor or a staff association / trade union.

A report can also be made anonymously through the Wiltshire Police PSD Anonymous Contact System which can be found on SharePoint and the [Wiltshire Police Standards Portal](#).

10. ASSESSMENT PROCESS

Any report will be received and assessed by the Counter-Corruption Unit.

Having conducted an initial assessment, there MAY be a requirement for CCU to conduct an Ethical Interview. This is not a disciplinary interview and Police Officers and staff are encouraged to consult with their respective staff associations or trade union to alleviate any concerns they may have.

If deemed appropriate, CCU will complete a Reportable Association Agreement that will be forwarded electronically to the member of staff concerned. The member of staff will be invited to acknowledge receipt and agree the terms of the said Agreement.

11. AGREEMENT REVIEWS

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All Reportable Associations subject to an Agreement should be reviewed on an annual basis or upon notifications of change of circumstance. The PDR process for all staff should also include a discussion with Line Managers about reportable associations.

It is the responsibility of the staff involved to notify their line manager of any change in circumstances and forward any new information to CCU at the earliest opportunity via a Reportable Association Notification form.

12. RIGHT TO APPEAL

Individuals should be informed that they have a right to appeal the decision made by CCU. Appeals against the decision should be submitted in writing within 14 days to the Head of Professional Standards. While an appeal decision is made, the individual should comply in the interim with the CCU decision directions.

13. NON-COMPLIANCE

All non-compliance matters should be referred as soon as practicable to CCU.

Where advice has been given that such an association must cease yet it persists or the restrictions are not being observed, then the conduct will be considered under the Police (Conduct) Regulations 2020 or as a disciplinary matter in respect of police staff in accordance with the Wiltshire [Police Staff Discipline Procedure](#).

The Head of Professional Standards will consider the matter and decide on the most appropriate course of action. In the assessment of such breaches aggravating factors and mitigation will be considered and addressed on a case by case basis.

Ownership:

Department Responsible: Professional Standards
 Policy Owner/Author: Supt Steve Cox / DI Troy SMITH
 Technical Author:
 Senior Officer/Manager Sponsor: Deputy Chief Constable

Revision History:

Revision Date	Version	Summary of Changes
25.05.2018	2.0	Data Protection section amended to reflect implementation of GDPR and new DPA.
09.01.2019	2.0	Reference in s3 under 'Private investigators' to paedophile hunters' changed to OCAG (Online Child Sexual Abuse Activist Group)
15.03.2021	3.0	Revised to reflect changes to CCU and Police (Conduct) Regulations 2020

Approvals:

This document requires the following approvals:

Name & Title	Date of Approval	Version
Continuous Improvement Team	15.03.2021	2.0
Supt Tim CORNER (Head of PSD)	15.03.2021	2.0
JNCC (Not required for all policies)	N/A minor amendments only	

Distribution:

This document has been distributed via:

Name & Title	Date of Issue	Version
Email to relevant affected Staff/Officers		
Other: (state method here)		

Diversity Impact Assessment:

Has a DIA been completed? If no, please indicate the date by which it will be completed. If yes, please send a copy of the DIA with the policy.	☒ Yes ☐ No Date:
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Consultation:

List below who you have consulted with on this policy (incl. committees, groups, etc.):

Name & Title	Date Consulted	Version
UNISON	January 2018	1.9
Police Federation	January 2018	1.9
ACU DI	January 2018	1.9

Implications of the Policy:**Training Requirements**

No training requirements have been identified in relation to this procedure.

IT Infrastructure

No IT input is required to implement this procedure.

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