

SI0523

Declarable Associations

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This Service Instruction provides guidance and direction to all Police Officers and Staff to notify their own line management and the Service Vetting Unit (SVU) of any association that has the potential to undermine public confidence in the PSNI.

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1. Introduction

The Police Service of Northern Ireland (PSNI) and the Public expect the highest standards from our Officers and Staff both on and off duty.

It is recognised that public confidence in policing can be seriously damaged if Officers and Staff associate with individuals or groups of people who are suspected of being involved in criminality and / or unethical behaviour.

It is accepted that the vast majority of Officers and Staff behave honestly and with complete integrity. However, there is a risk that associating with or being seen in the company of certain individuals, groups/organisations, may inadvertently or otherwise, compromise our own reputation, the operational activity of the PSNI and the reputation of the PSNI.

'Association' – will have its everyday meaning, which will include:

- Contact or relationships with family members;
- Meeting or uniting for a common purpose;

- Keeping company or being familiar;
- Having a friendship, relationship, partnership or intimacy;
- Contact through social media, email, internet, phone or any other communication device;
- Being a member of a group, organisation, or society, which is formed for the promotion of a common objective.

'Association' does not include a chance meeting.

This Service Instruction places an obligation on all Officers and Staff to notify their own line management and the Service Vetting Unit (SVU) of any association that has the potential to undermine public confidence in the PSNI. This obligation is defined as a Declarable Association. It is important that Officers and Staff clearly understand what a Declarable Association is and when they must notify their line management and SVU of any such association.

It is also recognised that there will be associations which are unavoidable, for

example through marriage / civil partnerships, or family and other close relationships. Therefore the primary purpose of this Service Instruction is to safeguard and protect Officers and Staff from any adverse perceptions regarding their integrity and impartiality.

Complying with this Service Instruction will also support Officers and Staff in their long term career progression into sensitive posts, by providing the mechanism to declare associations that may cause concern and might lead to vetting failure.

2. Declarable Associations

A declarable association is anything that has the potential to, or is likely to compromise:

- The individual reputation and safety of an Officer or Staff member;
- Police operations and activities of the Police Service;
- The reputation of the Police Service.

The association could stem from a family connection, childhood acquaintance or

attending locations where criminal elements frequent.

The following are examples of associations that you **MUST** report to your line management and to Service Vetting Unit (SVU).

Individual(s) you know or suspect to:

- Have a criminal conviction;
- Have been charged with or reported for a criminal offence;
- Be subject to a criminal investigation;
- Have previous or current links to criminal or paramilitary activity;
- Be journalist/s or members of the media;
- Be Private Investigators;
- Have been allowed to resign from a Police Service or other law enforcement agency whilst being under investigation for gross misconduct;

Also individual(s):

- Employed or engaged in any business or activity where there is a potential conflict of interest with a law enforcement agency;

- Who you have an association with who appear on the PSNI briefing pages;
- Dismissed or required to resign from a Police Service or other law enforcement agency for gross misconduct.

Please note that the above is not an exhaustive list. It remains your personal responsibility to reflect on any association you have and consider if this could lead to you or the Police Service being compromised.

3. Reporting

In all circumstances where Officers and Staff have a declarable association they must report this to their Line Manager and notify the Service Vetting Unit (SVU) by completing form DA1 and emailing this to zServiceVetting and their Line Manager.

It will be the Line Manager's responsibility to address any immediate safeguarding issues and they should update SVU accordingly.

The PSNI accepts that in some cases it is very difficult to control associations, particularly when there are familial links.

By declaring this association, measures can be put in place to support you and manage any risk.

It is of utmost importance that Officers and Staff do not conduct their own 'research' using Police systems to establish whether a family member or associate has criminal connections.

In the event that an Officer or Staff member has information or suspects that a colleague has not declared a relevant association this should be reported to the Anti-Corruption Intelligence Unit (ACU).

This can be done via the Integrity Matters platform; direct to ACU by emailing zACUIntelligenceUnit or via Crimestoppers Integrity Line 08001114444 or theline.co.uk

4. Risk Assessment

Following notification to line management and SVU or where information is available regarding a declarable association a risk assessment will be carried out. It may be necessary for SVU to contact the officer or Staff member to obtain further information to inform the risk assessment process. If it

requires an interview with SVU, the Officer or Staff member may be accompanied by a relevant Staff Association / Federation friend or colleague.

Following the risk assessment a report will be prepared by SVU. This report will detail what action, if any, should be taken in response to risks identified. These reports will be shared with Professional Standards Department.

For reports involving Senior Ranks and Staff (Superintendent and equivalent Police Staff grades) these reports will also be shared with the Deputy Chief Constable or Chief Operating Officer.

5. Inappropriate Associations

An 'Inappropriate Association' is when the association is incompatible with the high standards expected of an employee of the Police Service.

It is recognised that there is a significant overlap between a declarable association and an inappropriate association. It is important to note that an inappropriate association MAY include an unavoidable relationship with a close family member or

partner. SVU will review all information received and provided on DA1 form, Vetting questionnaire or obtained from interviews with Officer or Staff member and determine if the declared association is an 'Inappropriate Association'. The PSNI vetting process is a comprehensive tool to provide an appropriate level of assurance to the PSNI as to the trustworthiness, integrity and probable reliability of all Police Officers and Staff. It is therefore imperative that SVU objectively determine the degree to which your circumstances could be successfully managed.

6. Control Measures

Each case will be dealt with on its own merits with the information available. Any control measures put in place will be tailored on a case by case basis to manage and mitigate any identified risks. Control measures may include:

- Formally recording the association with a direction to update SVU should circumstances change;
- Issuing advice and guidance as how to manage any risk;

- Provide formal written instructions or management action to assist in protecting the individual and the organisation – Risk Management Agreement;
- Direction to cease the association, if it is considered the association is inappropriate;
- In some circumstances it may be necessary to relocate an Officer or Staff member.

7. Outcomes

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| <p>An Officer or Staff member will be referred to Professional Standards Department, Appropriate Authority or Human Resources as a potential breach of the 'Code of Ethics' or the terms of the 'Police Staff Handbook' if they are;</p> |
| <ul style="list-style-type: none"> • Directed to cease an association but it continues; |
| <ul style="list-style-type: none"> • Suspected of not disclosing a declarable association; |
| <ul style="list-style-type: none"> • Found to have disregarded the agreed control measures; or |
| <ul style="list-style-type: none"> • Suspected of being dishonest during the process. |

In all of the above circumstances this may lead to a review of current vetting status and / or utilising Service Confidence procedures.

8. Review Process

An individual can apply for a review of a decision made in connection with the 'Declarable Associations' procedure. The request to review a decision must be in writing and made to the head of Professional Standards Department within 7 calendar days of the person being informed of the decision. They will have a further 14 calendar days to submit all required material for their review.

9. Exclusion

This Service Instruction does not apply to Officers and Staff who are engaged in any legally authorised activity with any person, group or organisation whilst conducting their role within the Police Service.

Appendix A: Contact Us

Service Instruction Author

Professional Standards

PSD Contact:

zProfessionalStandardsReferrals@psni.police.uk

Anti-Corruption Unit contact:

zACUIntelligenceUnit@psni.police.uk

zServiceVetting@psni.police.uk