

Committee(s): Professional Standards and Integrity Committee	Dated: 9 th May 2023
Subject: Review of the Notifiable Association Policy	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1- People are Safe and Feel Safe
Does this proposal require extra revenue and/or capital spending?	N/A
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Commissioner of Police Pol 53-23	For Information
Report author: Claire Cresswell, Detective Superintendent Head of Professional Standards, Professionalism and Trust Portfolio	

Summary

The City of London Police (CoLP) has developed the Notifiable Association Policy that is applicable to all staff within the CoLP to ensure that any Inappropriate Associations obtained as part of the employees membership of any organisation or group, is appropriately referred to the force Counter Corruption Unit for assessment of the association and any risk linked to it.

This report details the changes to policy and the background information that initiated the development of policy.

Recommendation(s)

Members are asked to note the report.

Background

1. Questions at The Police Authority Board and the Professional Standards and Integrity Committee had previously requested a better understanding of how CoLP and CoL respond and guard against possible inappropriate associations that may develop between individuals that they associate with through membership to specific groups or organisations. In particular the Committee were concerned that membership to the Freemasons, specifically the Freemason Lodge associated with the City of London Corporation, may mean that inappropriate associations are formed. This paper explains the current policy for CoLP and how that has been enhanced.

Current Position

2. The Professional Standards Directorate reviewed the Notifiable Association Policy to consider whether further information could be added to support staff in reporting possible inappropriate associations linked to their membership of specific organisations or groups.

Additions made to the policy

- 1) An overview setting out expectations was added to clarify expectations of relationships and the need for memberships to groups must not create an actual or apparent conflict:

“In order to protect the integrity of the City of London Police, the police service and individual members of staff, it is imperative relationships are absolutely transparent, are capable of withstanding scrutiny and are maintained in a manner consistent with being a member of the police service. Membership of groups or societies, or associations with groups or individuals must not create an actual or apparent conflict of interest with police work and responsibilities”

- 2) The policy now defines when an association would be considered inappropriate. In addition it defines compromise for staff so that they can understand when compromise may occur. This encourages staff to consider the risk to themselves as well as trust and confidence in CoLP:

“An association will be considered inappropriate where it has the potential to, or is likely to:

- *Compromise the individual staff member, or*
- *Compromise the operations or activity of City of London Police, or*
- *Compromise public confidence in City of London Police.*

Definition of Compromise – is to place in a position of difficulty or danger, to expose to risk of failure, frustration or disgrace or to cast doubt on one's integrity. 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

- 3) The policy now details activities that have the potential, or are likely to lead to compromise to help guider staff in their considerations of inappropriate associations.

“there is no exhaustive list of activities, which have the potential or are likely to lead to compromise of the member of the organisation or compromise of the operational effectiveness or integrity of the City of London Police. However the following activities will have this potential:

- a) Passing information or intelligence in contravention of the Data Protection Act.*
- b) Misuse of Force I.T. systems.*
- c) Entering into an association, which involves the acceptance or granting of favours, benefits in cash or in kind, or bribes.*
- d) Turning a ‘blind eye’ to criminal or notifiable behaviour by another.*
- e) Failure to record and submit intelligence or a crime*
- f) Giving evidence of character in criminal proceedings on behalf of a person with whom an association is deemed to be notifiable.*
- g) Standing surety for an individual in criminal proceedings.*
- h) Discussing tactics, operations or technical equipment inappropriately such that, whether intentionally or not, could impact the operational effectiveness of City of London Police activity or reveal sensitive tactics.*

- 4) The policy has very clear guidance added that states that where an association from a membership to a club or society, uses this relationship to attempt to obtain police information outside of set process and guidelines this will be reported as an inappropriate association. This will allow the Counter Corruption Unit to appropriately assess the relationship and associate.

“Where an officer or a member of staff forms an association within a club or society, or through their daily interactions, and an associate within this club or society attempts to use their relationship with that member of staff to attempt to obtain police information or to gain police expertise from them, without following correct process or procedure, this should be reported as an inappropriate association”

- 5) The policy then provides clear examples for staff of clubs or societies where these associations may develop.

“Examples of clubs or societies, where such associations could arise could be within Worshipful Companies, Trade Associations, Freemasonry clubs, and recreational clubs and sports clubs. This list is unlimited and will be incumbent on the officer or member of staff making a judgement and seeking early advice from CCU”

Conclusion

3. The Force has adapted its Notifiable Association policy to effectively address the concerns of the Committee and to provide support and guidance to City of London Police officers and staff on when associations may become inappropriate, and when they should be declared to the Force.

Background Papers

City of London Police Notifiable Association Policy

Contact:

Claire Cresswell

Detective Superintendent

Head of Professional Standards

Professionalism and Trust Portfolio.

E: Claire.cresswell@cityoflondon.police.uk