

DISCLOSABLE ASSOCIATIONS POLICY

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NORFOLK
CONSTABULARY



SUFFOLK
CONSTABULARY

DISCLOSABLE ASSOCIATIONS

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Legal Basis

Legislation specific to the subject of this policy document:

- Police (Complaints and Misconduct) Regulations 2020
- Police Reform Act 2002
- Criminal Justice and Public Order Act 1994
- Police Regulations 2003, specifically Regulation 6, Schedule 1 & Annex AA Regulation 6
- Protection from Harassment Act 1997
- Police (Conduct) Regulations 2020
- Criminal Procedure and Investigations Act 1996
- Police (Vetting) Regulations 2025

Other relevant legislation which you must check this document against (required by law)

- [Human Rights Act 1998 \(in particular Article 8 and Article 14\)](#)
- [Equality Act 2010](#)
- [Crime and Disorder Act 1998](#)
- [Health and Safety at Work etc. Act 1974 and associated Regulations](#)
- [General Data Protection Regulation \(GDPR\) and Data Protection Act 2018](#)
- [Freedom Of Information Act 2000](#)
- [The Civil Contingencies Act 2004](#)

Other documentation which you must check this document against:

- [College of Policing – Code of Ethics](#)

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- [Norfolk and Suffolk Constabularies' Standards of Professional Behaviour](#)
- [College of Policing – Counter Corruption Authorised Professional Practice](#)

1. Introduction

- 1.1 Norfolk and Suffolk Constabularies (“the Constabularies”) expect and demand the highest levels of honesty and integrity from their officers and staff.
- 1.2 As public servants we are all expected to observe the highest standards of conduct in both our work and private lives. It is essential that the community we police, has confidence in our ability to discharge our duties with fairness and impartiality.
- 1.3 As such there is a risk that inappropriate associations could have a serious detrimental effect not only on the individual officer or member of staff, but also on the overall integrity, operational effectiveness and reputation of both the Constabularies.
- 1.4 With the introduction of hybrid and homeworking, the importance of declaring associations which have the potential to be inappropriate cannot be overestimated. Due consideration must, therefore, be given to the requirements within this policy regarding notification, when an assessment of hybrid or homeworking is completed. Furthermore, any current disclosed associations will need to be reviewed to ensure existing control measures are relevant.

2. Statement of Policy

- 2.1 This policy has been formally agreed via the approved policy development/review process. It will be maintained by the Professional Standards Department in conjunction with the Central Policy Unit and will be reviewed periodically to ensure that it reflects appropriate standards and continues to meet our needs.
- 2.2 The policy is intended to promote equality, eliminate unlawful discrimination and actively promote good relations regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, economic or family status.
- 2.3 Managers have a responsibility to ensure this policy is applied fairly, and unless otherwise stated, all policies are non-contractual.

3. Applicability

- 3.1 This policy applies to all police officers (including officers of the Special Constabulary) and all members of police staff (including police support volunteers), collectively referred to as “police personnel”.

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4. What is a 'Disclosable Association'?

- 4.1 A 'disclosable association' (sometimes referred to as Notifiable Association in other forces) is an association where, other than in the course of official police business (this includes staff association business), a member of police personnel comes into contact with any person which has the potential to, or is likely to, compromise police personnel, compromise operational activity, or compromise the reputation or integrity of the Constabularies.
- 4.2 This association can be inadvertent or otherwise and it is acknowledged that there will be some associations that are unavoidable, e.g. through marriage/civil partnerships or family/close relationships. Compliance with this policy will therefore protect the integrity of officers and staff who may find themselves in this position.
- 4.3 'Association' will have its everyday meaning and will include:
- Meeting or uniting for a common purpose, e.g. member of a sports team or organised club;
 - Keeping company or being familiar with;
 - Being an ally, partner or colleague;
 - Having a friendship, relationship, intimacy or family connection.
- 4.4 The term 'association' is not intended to include a person whom an officer or staff member knows casually or with whom they may be on 'nodding' terms.
- 4.5 It also does not include a chance meeting. However, where any such meeting may compromise the impartiality or integrity of a member of either Constabulary, the matter should also be reported in order to protect the interests of officers and staff. For example, where a person released under investigation, or on bail for an offence, approaches the officer in the case whilst off duty and engages them in conversation about the offence, it is in the interests of the officer to report the circumstances in order to safeguard against any allegations of wrongdoing that may result.

5. Aims and Objectives

- 5.1 The aims and objectives of this policy are to identify and address any actual or potential 'disclosable associations' between the Constabularies' police personnel and other individuals or organisations, in order to prevent any actual or potential compromise of policing functions, to protect the integrity of both the Constabularies and police personnel, and to maintain the operational effectiveness and reputation of both Constabularies.
- 5.2 This Policy also seeks to address the issues detailed in the Code of Ethics in relation to associations:

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- 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;
- The test is whether a reasonably informed member of the public might reasonably believe that your membership or association could adversely affect your ability to discharge your policing duties effectively and impartiality.

6. Responsibility to Disclose

- 6.1 All members of police personnel have a duty to report all 'disclosable associations' which they suspect, or of which they become aware, to the Professional Standards Department (PSD).
- 6.2 This reporting duty applies irrespective of whether the association involves themselves or another member of police personnel.
- 6.3 Police personnel must report an association with an individual or group where they know or suspect that the association is, or has been, with a person who falls into the following categories:
 - Member of the public with whom the member of police personnel has developed a personal relationship as a result of contact in the course of their duties, directly or indirectly, or any person where the relationship has the potential to create a conflict of interest;
 - Persons with unspent criminal convictions;
 - Persons charged with a criminal offence and the subject of a current prosecution;
 - Persons known to be under investigation but not yet charged with a criminal offence;
 - Persons who are the subject of criminal intelligence or the subject of an interest marker;
 - Persons who have been dismissed following disciplinary action or asked to resign from a police service or other law enforcement agency for reasons of misconduct;
 - Former police officers or other law enforcement officers who are working in a related field of employment outside the organisation, or other law enforcement agency. This will include private investigators and persons working for a law firm as a legal representative in the custody process.
 - Persons employed as legal representatives in the custody process.
 - Persons working for the press or media in either a paid or unpaid role.
 - Persons who work within the sex industry.

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- 6.4 It is not intended to prohibit all the associations listed above, but for reasons of clarity, these are listed as categories of association which must be declared, so that a determination can be made.
- 6.5 The list is not exhaustive and in cases where doubt exists as to the requirement to disclose, police personnel should err on the side of caution and report the details of the association so that appropriate enquiries can be made.

Please Note: There is no exemption from the Data Protection legislation in relation to accessing information to determine whether an association requires disclosing. Therefore, police personnel are not permitted to carry out checks on associates using either force's computer systems.

- 6.6 Failure to report a suspected or known disclosable association may result in disciplinary action.

7. Reporting Process

- 7.1 The report should be submitted in writing (can be in email format or a simple word document) and sent to:

Detective Inspector
Joint Anti-Corruption Unit
OCC
Building 9
Falconers Chase
Wymondham
Norfolk
NR18 0WW

or, emailed to: psd-acu@norfolk.police.uk

- 7.2 Alternatively, if preferred, the report can be submitted via:

- A line manager;
- The Police Federation;
- UNISON;
- The Superintendent's Association; or
- The confidential email facility.

- 7.3 Additionally, in cases where the association involves another member of police personnel, reporting will also be accepted via the confidential telephone line (Norfolk – 0845 4568989, Suffolk extn. – 3845) or anonymous confidential online reporting facility available from the intranet home page, and the PSD intranet sites.

- 7.4 The report should include the following information:

- Full details of the police personnel involved;

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- Full details of the individual or group with which there is an association; and
 - The reasons why the association is or may be inappropriate and therefore disclosable.
- 7.5 Under no circumstances should any Constabulary or national computer systems be researched to obtain details of the person(s) subject to the report.
- 7.6 Once received, the Head of PSD will ensure a record of the report is made and investigated fully by the Anti-Corruption Unit (ACU).
- 7.7 The reporting process is outlined in flowchart form at Appendix A.

8. Investigation and Determination Process

- 8.1 The ACU will investigate the report and evaluate the potential risks. The following will be taken into account when determining what, if any, action is to be taken or is appropriate:
- The nature of the relationship and the extent and closeness of it;
 - The antecedents and history of the person, group or organisation with whom the member of police personnel has the association;
 - Any criminal convictions of the person or persons within the group or organisation with whom the member of police personnel is associated;
 - The number, seriousness and frequency of the convictions and the time since the last conviction of the person or persons within the group or organisation with whom the member of police personnel has the association;
 - The suspected involvement in crime or inappropriate activity of the person or persons within the group or organisation with whom the member of police personnel has the association;
 - The criminal associations of the person or persons within the group or organisation with whom the member of police personnel has the association;
 - The nature and objectives of the group or organisation with which the member of police personnel is associated;
 - Any other reported associations for that member of police personnel or other intelligence relating to them.
- 8.2 Once the ACU have conducted proportionate inquiries, they will decide if the association is appropriate or not, and take action depending on the decision made.
- 8.3 The ACU will conduct this review in a timely manner. If it is anticipated, during this initial review, that the risk is likely to be high, the ACU will provide some interim control measures to manage any potential risk.

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Association Determined to be Disclosable and requires risk management

8.4 Where the association is deemed to require risk management, the ACU will need to assess it against the relevant potential risks (as per those listed in Appendix B) and either:

- Identify appropriate control measures to be put in place to mitigate/minimise any potential risks to enable the association to continue; or
- Decide that the association must cease*.

*If the decision is made that the association must cease and this is not practicable, e.g. because the association is through marriage/civil partnership or a family/close/long-term relationship, the action to be taken and the necessary restrictions to be placed on the relationship will be prescribed in order to minimise any risks.

8.5 Once this decision has been made, the ACU will invite the individual concerned to attend a meeting. The individual will be given the opportunity to have a staff association/Trade Union/Staff Support Group representative present at this meeting.

8.6 At the meeting, the individual will be informed of the decision and the potential risks and impacts of the association to the individual, the organisation(s) and any operational or work activity where control measures have been identified; these will also be discussed and imposed at the meeting.

8.7 Restrictions placed on the individual will only be those that are necessary and proportionate to minimise the risks to the Constabularies and may include, but are not limited to, where they can work and what information they are allowed to access.

8.8 If the association is deemed to be 'high risk' this meeting will be recorded (audio as a minimum).

8.9 The decision as to whether an association is 'disclosable' and requires control measures is overseen by the ACU Detective Inspector, supported by ACU Supervisors.

8.10 If the association has been assessed as 'high risk', the Head of PSD will be provided with a report and decide whether the association should cease. If the decision is that the association can be maintained, they will provide guidance on appropriate control measures.

8.11 The Head of PSD has been given formal delegation from the Chief Constable of each of the Constabularies to make the decision to order that associations are to cease (powers under Police Regulations 2003, specifically Regulation 6, Schedule 1 & Annex AA Regulation 6).

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- 8.12 Where an association is deemed to be 'disclosable' under this policy and formal control measures are given to the officer or police staff member, the control measures are to be considered lawful orders/lawful instructions.

Association Determined to be Appropriate

- 8.13 Where the association is deemed to be appropriate, with little to no risk, the ACU will inform the individual by email, confirming that the association may continue.
- 8.14 The investigation and determination process is outlined in flowchart form at Appendix A.

9. Recording the Decision

- 9.1 Whether the association is determined to be appropriate or not, the ACU must record the notification of the association, the outcome of the investigations, as well as the time and date of when the individual was informed of the outcome on the Disclosable Associations Register.
- 9.2 A copy of the decision, with any restrictions imposed, must be forwarded to the individual's line manager and Head of Department or Commander, who will be responsible for ensuring a copy is placed on the individual's personal file. A copy will also be retained by the PSD.

10. Failure to comply with the determination and/or restrictions

- 10.1 Where a member of police personnel persists in an inappropriate association or fails to comply with the restrictions/limitations imposed, the matter must be referred to the Head of PSD who will decide on the most appropriate course of action. This may include amending or setting additional restrictions/limitations to the association or commencing a misconduct inquiry.
- 10.2 The Head of PSD must then formally advise the individual of their decision and any amended or additional restrictions put in place.
- 10.3 The Disclosable Associations Register must be updated and the individual's Head of Department or Commander must also be informed and an updated copy of the decisions and restrictions placed on the individual's personal file.

11. Changes to the circumstances of the association

- 11.1 If, once a decision has been made and finalised, the circumstances of the association change from those originally disclosed, then another report will need to be submitted for review as per the reporting process outlined above.

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Overlap with Vetting

- 11.2 All associations which are assessed as requiring risk management, will be communicated to the Constabularies' Vetting Unit.
- 11.3 The Vetting Unit will assess any newly adopted 'disclosable associations' under the Vetting APP and determine what, if any, further action is required within the Vetting regime.
- 11.4 On occasions, it may be more suitable for the Vetting Unit to manage the risk, particularly in cases where the association is deemed incompatible with policing. In these cases, the Vetting APP and Police (Vetting) Regulations 2025 will be considered.
- 11.5 Where there is a significant overlap between this policy and the Vetting APP there will be a discussion between ACU and the Vetting Unit to make a decision on how best to manage the risk. This decision will be documented within ACU and on the Vetting System.

12. Appeals

- 12.1 Individuals may appeal against the determination and/or restrictions imposed on the association. Advice and assistance can be sought from the Police Federation, UNISON or Superintendent's Association if required.
- 12.2 The appeal must be in writing to the Head of PSD within 14 calendar days of being informed of the original determination and must:
- State the date the determination was made;
 - State the terms of the determination;
 - State the parties involved in the determination;
 - Clearly and concisely set out why the individual disagrees with the determination, or a specific aspect(s) of it; and
 - Be signed and dated by the individual concerned.
- 12.3 The Head of PSD will forward the appeal to the Deputy Chief Constable (DCC) of the relevant Constabulary for consideration. The individual, or their staff association or UNISON representative, then has the right to make representations to the DCC.
- 12.4 Representations to the DCC will usually be made in writing, but there may be some occasions where a face-to-face appeal is more suitable. Where a face-to-face appeal is deemed appropriate, the staff association/UNISON representative or individual will request this with the DCC, providing rationale as to why it should be face-to-face. Generally, if face-to-face appeals have been requested these will be accepted, unless exceptional circumstances apply. If the DCC does not agree with the request to hold a face-to-face appeal, the DCC will give the rationale for the rejection, which must be returned in writing to the staff association/UNISON and/or

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individual. The DCC will take any representations into account when considering the appeal.

12.5 The DCC may confirm or overturn the original determination of the Head of PSD and/or where appropriate, impose different restrictions on the association. The individual will be informed of the DCC's decision in writing within 28 calendar days.

12.6 A copy of the DCC's decision will be forwarded to the individual's Head of Department or Commander. A copy will also be forwarded to, and retained by, the PSD, as well as a copy being placed on the individual's personal file.

12.7 The decision of the DCC is final.

12.8 The appeals process is outlined in flowchart form at Appendix C.

13. Reporting and Recording of Intelligence

13.1 Where a member of police personnel receives intelligence in relation to, or from, the associate, then this should be submitted directly to the ACU, who will then record and submit the intelligence on their behalf. This will protect the member of police personnel subject to the association from the risk of compromise.

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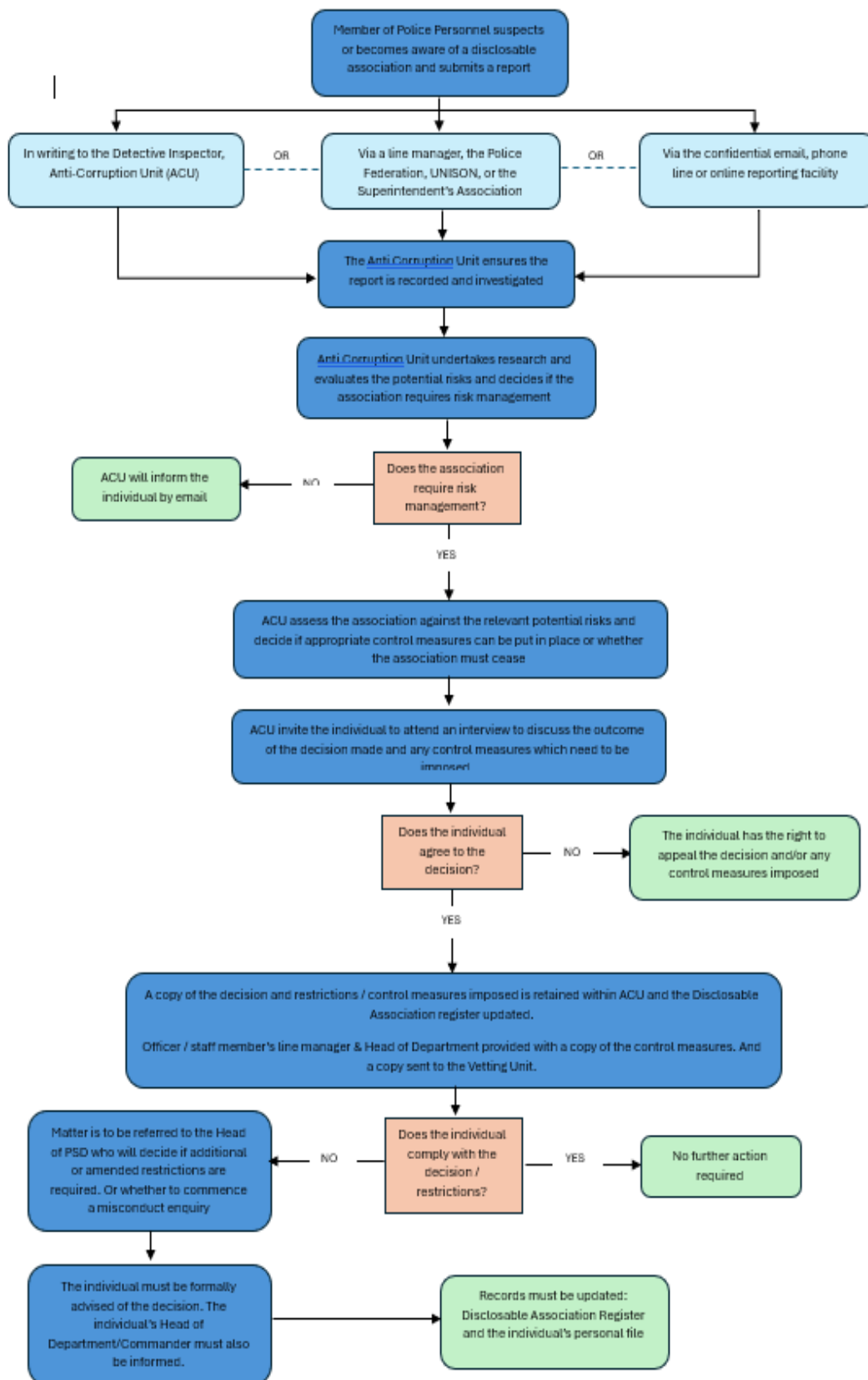
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Appendix A – Reporting, Investigation and Determination Process Flowchart



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Appendix B – Potential risks and possible control measures

Potential Risk	Why is it a risk?	Possible control measures*
Undermining public confidence	Association adversely affects impartiality and service delivery.	a), b)
Damage to organisational reputation	Association adversely affects current work strands and local partnerships.	b), c)
Criminal Justice failures	Association adversely affects ability to provide evidence.	c), d)
Operational activity compromise	Association presents risk of operational compromise.	c), e)
Personal injury (to officers/ members of staff with associations subject of this policy)	Circulation of personal details to a wider criminal network.	a), b), c), d), e), g)
Personal injury (to the public)	Associate and their contacts at risk from wider criminal network due to connection with member of constabulary	a), b), c), d), e), g)
Physical dangers due to exposure as police officers and staff	Potential compromise of police operations due to disclosure of intelligence to criminal contact and associations.	a), b), c), d), e), g)
Personal injury/ Physical assault (to victims, witnesses, sources ("CHIS"))	Potential misuse of police held data and PNC due to criminal associations of officer/ staff member.	a), b), c), d), e), g)
Physical dangers due to criminal justice failures (to witnesses, victims, CHIS involved in court processes)	Association adversely affects ability to provide evidence thereby impacting on criminal justice process	a), b), c), d), e), g)
Psychological harm (to officers and staff)	Stress related matters caused by pressures or demands of criminal association.	a), b), c), d), e), g), h)

*Possible control measures:

- Remind the individual of data protection issues and need to know principle
- Consider restrictions and conditions on further association in agreement with the individual and Operational Security Officer
- Consider temporary change of role or area of work in agreement with the individual and Operational Security Advisor (OpSy) whilst the association continues

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- d) Review casework of the individual in liaison with the CJU Manager
- e) Arrange process for submission of intelligence.
- f) Police personnel to disclose this association to their supervisor to ensure awareness of the situation
- g) Liaise with the Anti Corruption Unit and OpSy
- h) Nominate liaison officer

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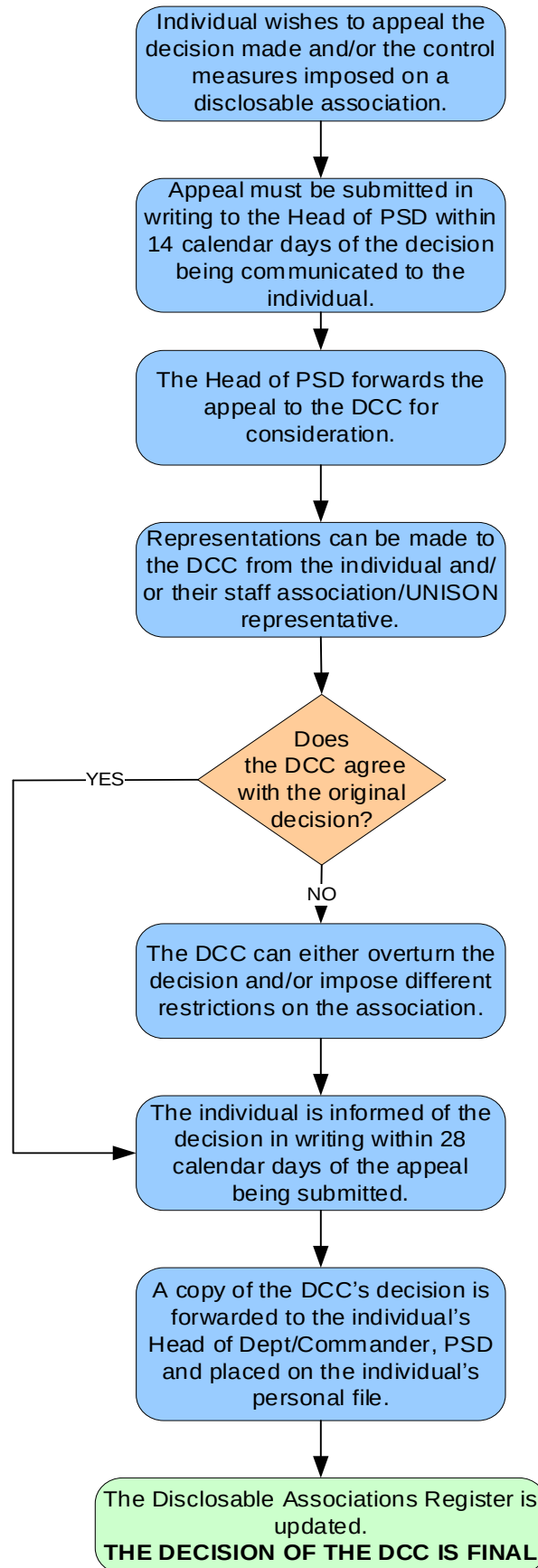
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Appendix C – Appeals Process Flowchart



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