



NOTIFIABLE ASSOCIATION POLICY

Executive Summary

All forms of police corruption are damaging. Corruption undermines investigations, prosecutions, endangers members of the service and impacts on the trust and confidence that our communities have in West Midlands Police (WMP).

It is of fundamental importance that our communities have confidence in our ability to discharge our functions with fairness and total impartiality. As such, some notifiable associations are likely to have an adverse impact on the integrity of individuals and the effectiveness and reputation of the WMP.

The Force recognises that the vast majority of its officers and staff behave honestly and with absolute integrity and any referral of a notifiable association made by or about an individual should not be considered as detrimental. There are however, personnel who associate with individuals, groups or organisations whose character or history makes an association undesirable and a potential risk. This includes situations where officers/staff are unknowingly put in a vulnerable position or at risk due to the actions of others.

Authorised Professional Practice (APP)

WMP has adopted the [Counter Corruption APP](#), with supplementary information contained herein, which reflects local practice and the needs of the communities served by West Midlands Police.

Scope

This policy applies to all Police Officers and Police Staff employed by WMP.

Objectives

The purpose of this policy is to:

- Safeguard the integrity of individual officers and staff, to prevent actual or perceived compromise to operations and intelligence belonging to law enforcement agencies and to maintain public confidence in policing.
- Create a culture where the declaration of notifiable associations is considered routine and positive, without negative inference. An open and transparent culture assists to eliminate the risks that associations can bring, both to the individual and the organisation. Just because an association is notifiable, it does not necessarily mean it is inappropriate or that restrictions are required. Where concerns are identified, an open and supportive process should be adopted (subject to the harm test).

Definitions/Acronyms

NOTIFIABLE

- An association with any individual or group will be considered to be notifiable where a person is in contact with, in the presence of any individual / group or has a family member who has the potential to:
 - Compromise a member of WMP
 - Compromise investigations conducted by WMP or partner agencies
 - Jeopardise the trust and confidence that communities have in the police service



- There isn't a definitive list of Notifiable Associations, however the below scenarios will always meet the definition and require a referral.
- An association with an individual or group:
 - Known to have a criminal conviction(s)
 - Charged with a criminal offence and subject of a current prosecution.
 - Known to be subject to a criminal investigation but not yet charged.
 - Known to be subject of criminal intelligence or are of interest
 - Persons dismissed or required to resign from a police service (or other law enforcement agency) or persons who resigned/retired whilst under investigation for gross misconduct.
 - Private investigators, regardless of any specialism or whether they are licenced and/or registered (e.g. private investigators and legal firms).
 - 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).
 - Individuals or groups protesting against the police service or the rule of law
 - Media representatives/journalists (television, radio, print and online)
 - Individuals who are members of or have associations with extremist groups.
 - Persons employed or engaged in any business or activity where there is a potential conflict of interest with the force
 - Intimate relationships with any members of the public where contact was established through 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 West Midlands 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.

ASSOCIATION

- Association will have its normal everyday meaning including:
 - Meeting or uniting for a common purpose
 - Keeping company or being familiar
 - Being an ally, confederate, partner or colleague
 - Having friendship, intimacy or connection
 - Having a family connection (see definitions)
 - Being a member of a group, organisation or society, which is formed for the promotion of a common object or aims
 - This also includes association via social media
- It is accepted that officers/staff may not always be aware of information that would make an association notifiable, however where they suspect or know, they must comply with this policy.

EXCLUSIONS

- Notifiable associations should not include individuals with whom the officer or staff member has a purely professional, on-duty relationship.
- Notifiable associations will generally not include a person who the officer/staff member is purely on 'nodding terms' with or has a chance meeting with.



- Protection under legislation (eg. [The Public Interest Disclosure Act 1998](#))

FAMILY MEMBER

- Parent, child, sibling (and second-degree relatives where there is regular contact)

POLICE FRIEND

- Work Colleague, Staff Union, Police Federation or Staff Network representative

ACRONYMS

AA	Appropriate Authority
HR	Human Resources
OCAG	Online Child Sexual Abuse Activist Group
PSD	Professional Standards Department
WMP	West Midlands Police

Policy Information

1. OVERVIEW

- 1.1 Where any police officer or staff member, suspects or become aware of a notifiable association, they must never conduct systems checks to confirm their beliefs.
- 1.2 The officer/staff member must inform their line manager (or duty supervisor) of a potential notifiable association as soon as practicable. This allows for the manager to provide immediate advice/support and minimise any immediate risks.
- 1.3 The officer/staff member must then ensure a Notifiable Association Report is submitted to PSD regarding the notifiable association. Manager comments and any advice/mitigation should be recorded by the manager.
- 1.4 The officer/staff must identify the person or group whom they are associated to and why they believe their association or that of another meets the criteria for notifiable associations.
- 1.5 Referrals must be seen as an opportunity to manage the risk to that individual and prevent them being a target or subject of corruption.
- 1.6 Where officers/staff becomes aware of or suspect a notifiable association between another staff member and an individual or group, they must inform their line manager or PSD.

2 INVESTIGATION AND INTERVIEWS

- 2.1 The majority of notifiable associations will not result in any action required, except advice and guidance to safeguard the officer/staff member.
- 2.2 However, where a notifiable association is identified (or suspected), it may be necessary to clarify circumstances with the officer/staff member.



- 2.3 Line managers, local managers and PSD may contact the officer/staff member to seek clarification. This may include (but not limited to); the nature of the association and any knowledge of risk or vulnerability.
- 2.4 Where there is an identifiable risk or intervention is required, a formal interview may be required.
- 2.5 All notifiable association interviews will be at the direction of PSD, however may be carried out by local managers.
- 2.6 The member of staff/officer has the right to seek advice from a police friend, and may request their attendance to support them at the interview.

3. MANAGING THE RISK

- 3.1 There will be times when simple mitigation can be agreed to prevent a notifiable association becoming a risk (such as reporting any contact with the notifiable association or postings restrictions).
- 3.2 However, where more significant intervention is required, this will initially be discussed with the member of staff/officer during an interview, to give opportunity for the member of staff/officer to suggest mitigation and agree options.
- 3.3 There may be rare occasions where risk presented requires immediate mitigation that is imposed.
- 3.4 Following this, the conversation will then still take place to allow the staff/officer to suggest mitigation and agree options.
- 3.5 All voluntary/agreed mitigation, will require the approval of a PSD Appropriate Authority (AA).
- 3.6 Where mitigation cannot be agreed, the matter will be referred to a PSD AA to consider.
- 3.7 The PSD AA will decide if the notifiable association presents a risk, if suitable mitigation/restrictions need to be put in place or if the association must cease.
- 3.8 In circumstances where the officer/staff member disputes the imposing of any conditions, the PSD AA will allow the officer/staff member and/or police friend to make representations.
- 3.9 Where conditions are imposed, the officer/staff member will be provided with the conditions in writing, any relevant review period and the right to appeal.
- 3.10 Where the officer/staff member is in possession of either management vetting, security clearance or developed vetting, the vetting department will review the identified risk in line with Vetting APP.
- 3.11 Where the officer/staff member only holds Recruitment Vetting, the vetting department may review the identified risk in line with Vetting APP.

4. APPEALS



- 4.1 Whilst subject to an appeal process, the individual will be served notice of any conditions in relation to the notifiable association.
- 4.2 During the appeal period, the conditions must be adhered to by the officer/staff member.
- 4.3 Any breach of the conditions during the appeal period will be referred to the relevant misconduct procedures.
- 4.4 Where the officer/staff member seeks to appeal against a determination made by the PSD AA, they should submit an appeal to the Head of PSD (or deputy in their absence) within 14 days from receipt of the determination to impose conditions.
- 4.5 Risk Management measures applied during a vetting clearance (for all cases of new applications for vetting) are not subject to the right to appeal under this policy as these have been a condition of granting vetting clearance. Risk Mitigation measures applied in these circumstances will be subject to a natural review. Officers and staff can request a review of these conditions should there be a change of circumstances or natural vetting renewal/ review process.
- 4.6 Any appeal should be in writing and identify why the individual disagrees with the determination, and provide any documents that an individual seeks to rely upon to support their appeal.
- 4.7 Advice and support will be available from the police friend.
- 4.8 On receipt of an appeal, the relevant paperwork will be forward to the Head of PSD in order for an appeal panel to be convened. An appeal panel will consist of;
 - The head or deputy head of PSD (chair of the appeal panel)
 - An independent panel member appointed by the chair, who is either;
- 4.9 a senior police officer (Chief Inspector, police staff equivalent, or above, who does not work in PSD or in the Individuals home department/area), or
 - A senior HR professional
- 4.10 The chair of the panel may also invite (where appropriate, and to ensure legitimacy and fairness);
 - A staff association, federation, or union representative, or
 - A member of the PSD Independent Advisory Group
- 4.11 The appeal panel will consider the individuals written appeal and any documents provided. They will provide written confirmation of the outcome to the individual;
 - Appeal not upheld – Risk Management Measures applied in current format
 - Appeal upheld – Risk Management Measures removed or altered accordingly.
- 4.12 The decision of the appeal panel is final, there is no further appeal body.
- 4.13 During the appeal period (pending appeal panel decision) any Risk Mitigation Measures applied remain live, and a failure to comply will be dealt with as stated above.



- 4.14 There is no right of appeal against a failure to comply (as this will be subject to Appropriate Authority assessment of conduct and progressed through separate proceedings).

5. MISCONDUCT

- 5.1 Failure to report a potential notifiable association by an officer/staff member may be referred to the relevant misconduct procedures.
- 5.2 A failure to comply with conditions under this policy may be a breach of the Standards of Professional Behaviour for Police Officers and Staff.
- 5.3 Where conditions are imposed, any breach of the conditions may be referred to the relevant misconduct procedures. The imposition of conditions will be communicated as a lawful order or reasonable instruction to Officers and Police Staff.

6. MONITORING AND REVIEW

- 6.1 All records held in respect of notifiable associations and conditions will be stored electronically by PSD in a format that can produce management data.
- 6.2 Regular reporting against recorded protected characteristics will be published internally for review within PSD Performance monitoring.
- 6.3 An annual review of individual conditions will be carried out by a PSD AA, where the officer/staff member will be invited to make representations and may seek support from a police friend.
- 6.4 Following the annual review, the PSD AA may make recommendations to vary, add or remove conditions, following consultation with the officer/staff member.
- 6.5 Any variation or additional conditions will have a right of appeal.
- 6.6 A review of the risk and any conditions can be carried out at any other time, where the PSD AA believes there has been a significant change in circumstances.

Relevant Legislation / Policies / Guidance

- [Professional Standards: Counter Corruption](#)
- [The Public Interest Disclosure Act 1998](#)

Equality Impact Assessment

WMP places trust in their employees to comply with force policies and to work in accordance with and in support of:

- [WMP Vision and Values](#)
- [Code of Ethics | College of Policing](#)
- [Voice of the Child](#)



	What impact has this policy had on the nine protected characteristics in relation to the three general duties? (If applicable)	How will this updated policy positively impact each of the nine protected characteristics in relation to the three general duties? If not, explain why it will not.
Age (including children and young persons)	Current PSD management information/data does not present concern. No specific impact identified.	There are no changes to current policy to impact existing EA
Disability	Current PSD management information/data does not present concern. No specific impact identified.	There are no changes to current policy to impact existing EA
Gender Reassignment	Current PSD management information/data does not present concern. No specific impact identified.	There are no changes to current policy to impact existing EA
Pregnancy & Maternity	Current PSD management information/data does not present concern. No specific impact identified.	There are no changes to current policy to impact existing EA
Marriage & Civil Partnership	Current PSD management information/data does not present concern. No specific impact identified.	There are no changes to current policy to impact existing EA
Race	<p>PSD management information and feedback from stakeholders suggests that colleagues from Asian backgrounds may be disproportionately represented in Notifiable Associations.</p> <p>Feedback from staff networks in respect of Notifiable Associations and Vetting suggests that Asian colleagues are more likely to live in extended households and close communities. This therefore increases the possibility of a notifiable association.</p> <p>This does not suggest that the risk in relation to Asian colleagues is higher than other groups, but that they may be directly linked to more people.</p>	<p>The policy has defined family member as 'parent, child, sibling (and 'second degree relatives where there is regular contact').</p> <p>This is intended to ensure that extended family members do not have to be disclosed purely due to their existence, but because there is regular contact.</p> <p>Where there is regular contact and the individual meets the criteria of 'Notifiable', it is correct that they should be referred; allowing WMP to manage any potential risk and support the individual.</p> <p>PSD routinely review representation within notifiable associations, and the resulting outcomes/decisions within management information to ensure ongoing monitoring of proportionality.</p>



	Where there is regular contact and the individual meets the criteria of 'Notifiable', it is correct that they should be referred; allowing WMP to manage any potential risk and support the individual.	
Religion or Belief	May be indirectly affected where linked to Race as above	
Sex	Current PSD management information/data does not present concern. No specific impact identified.	There are no changes to current policy to impact existing EA
Sexual Orientation	Current PSD management information/data does not present concern. No specific impact identified.	There are no changes to current policy to impact existing EA

Publication Instructions

Suitable for publication to public.

Document Control

Strategic Lead: <i>[role and name]</i>	
Policy Author(s): <i>[role and name]</i>	
Effective Date:	07/09/2026
FET Lead: <i>[role and name]</i>	DCC Scott Green
Version Number:	V2.2
Review Date:	29/04/2028

Any enquiries in relation to this policy should be made directly with the Strategic Lead.

All policies are subject to a formal consultation process which encompasses Legal, Professional Standards, Faith Groups, Trade Unions, Independent Advisory Groups and wider force groups and any other relevant parties. A record of consultation can be found on the Policy Portal.

It is responsibility of the Strategic Lead to ensure that all links within the policy are correct and accessible.

Amendment History:

Version Number:	Effective Date:	Summary of Amendments:	Author:
2	03/02/25	Minor Changes	
2.1	25/06/25	Changes ref appeals to vetting	
2.2	07/09/26	Minor amends under section 3	

Official

