



OFFICIAL

Policy Title:	Business and External Interests
Date Published:	August 26
Business Lead:	Head of Vetting and Force Security
CCMT sponsor:	Deputy Chief Constable

Thames Valley Police ensures that all policies have been assessed and comply with MoPI Guidance, and the Data Protection Act 2018. In addition, this Policy has been reviewed by the Health and Safety Governance Board and has undergone an Equality Impact Assessment.

1.0 About this Policy

1.1 Rationale

This guidance applies to all police officers, special constable¹ and permanent and fixed term police staff. It does not include volunteers, agency workers and contractors. However, the Thames Valley Police Vetting Department may ask certain agency workers and contractors to provide details of any external business interests to ensure there are no conflicts of interest.

1.2 Legislation/National Standards

Police Regulation 2003 impose restrictions on the private lives of police officers, in particular officers who have a business interest. Whilst police staff are not subject to the same restrictions, they are required to adhere to the standards of behaviour set out in the College of Policing's Code of Ethics. The Police Staff Conditions of Service Handbook also explains the rules on working hours which must not exceed an average of 48 hours per week over a 20 week period. It further states that employees are required to request permission for secondary employment and / or a business interest.

¹ Please note this does not include primary permanent occupations as disclosed at recruitment stage, but does include any additional roles once attested.

Choose an item.

1.3 Intention

All persons that this policy applies to must declare their business and external interests, and changes to previously approved business and external interests. Any person who has any doubts about whether or not they should seek approval for their business and external interests should contact the Business Interests mail box for advice.

1.4 General Principles

The main principle of this policy is that, unless there is good reason not to, business and external interests will be approved. The reasoning behind any application being rejected will be recorded and, where an application is granted with conditions, the conditions and reasons for them will be recorded.

2.0 Statement of Policy

2.1 A business interest is defined in the Police Regulations as;

2.1.1 the member holds any office or employment for hire or gain (otherwise than as a member of a police force) or carries on any business; or

2.1.2 being a member of a police force or a relative of a member, the person holds or possesses a pecuniary interest in a licence or permit granted in pursuance of the law relating to alcohol licensing, refreshment houses or betting and gaming or regulating places of entertainment in the area of the police force in question.

2.1.3 "relative", in relation to a member of a police force, means—

(a) a spouse or civil partner who is not separated from the member;

(b) a person living with the member as if they were the member's spouse or civil partner; or

(c) a parent, son, daughter, brother or sister of the member, who is included in the member's family

2.2 The policy also includes an individual leasing/renting 1 or more properties

2.3 Whilst the provisions of the Police Regulations and therefore the definition of a business interest does not directly apply to police staff, the definition is considered appropriate for police staff and will therefore apply by virtue of this policy to police staff in all respects.

Choose an item.

2.4 Examples of external interests covered by this policy include:

- being paid for an additional job or service, and
- doing voluntary work that may conflict with the organisation.

If you are being paid, you must get approval.

If the role is unpaid (for example, voluntary work), you should still ask for approval. The Force Security team will then decide whether it needs to be formally registered as a Business Interest. If it does not meet the criteria, it will still be recorded on your vetting file as a “business interest voluntary,” but it will not be officially registered.

If you are unsure, you should ask for advice through the Business Interests mailbox before deciding whether to submit an application.

3.0 Human Rights Articles Engaged

Article 6 – Right to a fair trial

Undeclared or mismanaged business interests can undermine:

- Criminal investigations
- Disclosure decisions
- Court proceedings

A financial or commercial interest could give rise to actual or perceived bias, which could jeopardise prosecutions.

Article 8 – Right to respect for private and family life

Declaring business interests involves processing:

- Personal financial data
- Family or partner interests
- Secondary employment

This is an interference with private life, but one that can be justified.

Article 10 – Freedom of expression

Article 11 – Freedom of association

Choose an item.

Article 14 – Prohibition of Discrimination

Business Interest rules must not:

- Unfairly target certain roles or grades
- Disadvantage particular groups indirectly

This policy has been developed with regard to the Human Rights Act 1998 in particular articles 6, 8 & 14 of the European Convention of Human Rights. Any interference with individual rights is necessary, proportionate and in pursuit of legitimate aims of preventing conflicts of interests, safeguarding fairness in the criminal justice system and maintaining public confidence in policing.

4.0 Health and Safety at Work

- Dual roles risk and fatigue
- Working times directives, rest and legal compliance
- Physical safety and injury risk
- Psychological and emotional health
- Insurance and liability clarity

5.0 Communications, Challenges and Representations

5.1 Communication

PSD Intranet pages

5.2 Challenges and representation

To ensure transparency and accountability any decision made as a result of following this policy should be clearly documented.

All challenges and representations should be made in writing to:

Head of PSD, or nominated deputy,

Thames Valley Police
Headquarters
Oxford Road
Kidlington
Oxon
OX5 2NX

Choose an item.

6.0 Review Date

01/08/2028

7.0 Related Guidance

- Court rulings – Domestic, European and Human Rights
- Examples of good practice from other Forces or other organisations
- Changes in Home Office Circulars
- Changes in Police Regulations or Police Council Pay and Conditions of Service Handbook
- Organisational Learning
- Representations made by individuals and relevant organisations
- Relevant diversity data
- HMICFRS findings
- Working Time Regulations

8.0 Freedom of information

Suitable for publication.

9.0 Government Security Classification Policy

Official

10.0 Relevant Supporting information

Appendix A, B, C, D & E