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Our Ref: FOI2019/06241

**REQUEST UNDER THE FREEDOM OF INFORMATION ACT 2000 Ref No: FOI2019/06241**

I write in connection with your request for information received on 30th September. I note you seek access to the following information:

**I am in possession of an official police document which states:**

**The Code of Ethics and Police Regulations 16. The code of ethics relates to officers being associated to groups or activities.**

**17. 6.3 of the codes states "Memberships 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".**

**18. 6.4 states "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 impartially".**

**19. The College of Policing Integrity and Ethics Team have stated that the topic has never come up before and that 6.4 above should be considered. They have not provided any additional guidance.**

**20. Police regulations do not offer any guidance in relation to this matter. The Anti-Corruption Unit has considered whether officers should tell the organisation that they hunt in relation to notifiable associations within Police Regulations. They have said that it would be inappropriate to proactively ask members of staff about their associations with hunts on the basis that it's a lawful activity.**

**21. As a comparator, membership of the Freemasons has long been a contentious issue, there is not currently however legal basis upon which to require police officers or staff to declare Freemasonry membership. This is the case for Hunting both locally and nationally.**

**To paraphrase from the above - as a reasonably informed member of the public, I reasonably (based upon direct personal experience over considerable time) believe that serving officers with membership of or association with foxhunts or foxhunting voluntarily place themselves in situations where such membership or association adversely affects their ability to discharge their policing duties effectively and impartially.**

**Most particularly and obviously so when such officers are attached to rural crime teams; I am given to understand that rural crime work is taken on voluntarily and in addition to an officer's core duties.**

**Laudable though this is, it raises the ethical question of an officer or officers with hunt membership or association being tasked to investigate allegations of lawbreaking by a hunt and hunt members with whom the officer(s) has or have contact outside of official police duties. I regard this in its mildest form as a demonstrable conflict of interest and at worst as raising reasonable doubts as to that officer(s) impartiality; a matter which could be open to misinterpretation by hunt members and supporters as well as those opposed to hunting in any form, legal or otherwise.**

**1. Please advise what steps have been taken within your force to ensure that a Code of Ethics exists which makes provision for conflicts of interest in matters where allegations of illegal hunting or cub hunting have been made.**

**2. Please advise if officers seeking to work on rural crime teams should be requested to voluntarily declare any membership of or association with hunts, regardless of hunting within the parameters of the Hunting Act 2004 being legal; such declarations being seen as goodwill and in the spirit of keeping your force from disrepute in the public mind.**

I am required by the Freedom of Information Act 2000 (The Act) to handle all requests in a manner that is blind to the identity of the requestor. Any information released in response to a request is regarded as being published and therefore, in the public domain without caveat.

**RESPONSE** - Following enquiries conducted by Bedfordshire Police within the Force please see our response below: -

1. The College of Policing's Code of Ethics is quite specific in 6.3 and 6.4. All officers are aware of the Code of Ethics and are subject to an integrity check as part of their yearly review.
2. The Rural Crime Team is not a voluntary role in addition to core duties, it is a full time team. There is no requirement for officers from the Rural Crime Team to declare any associations or memberships of any hunts or hunting associations unless there is an 'actual or apparent conflict of interest with Police work and responsibilities', as per the circumstances under 6.3 of the Code of Ethics.

The numerical data presented in this response is an un-audited snapshot of un-published data sourced from "live" systems and is subject to the interpretation of the original request by the individual extracting the data.

Should you have any further enquiries concerning this matter please do not hesitate to contact me quoting the above reference number.

Yours sincerely

Gary Maxey  
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Bedfordshire Police provides you the right to request an independent review of this response under its review procedure. If you require such a review you must notify us within two months from the date of this letter. After lodging a complaint with Bedfordshire Police if you are still dissatisfied with the decision you may make an application to the Information Commissioner. For information on how to make a complaint please visit their website at <https://ico.org.uk/concerns/> or contact them on 0303 123 1113.