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# WILTSHIRE POLICE FORCE POLICY



## Unmanageable Debt

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## **1. POLICY STATEMENT**

The 2020 NCA National Strategic Assessment identifies 'financial hardship' as a corruption risk to police officers and staff.

While it is accepted that an individual employee of Wiltshire Police may be burdened with unmanageable debt through little or no fault of their own, unmanageable debt / borrowing can make members of the Police service vulnerable / susceptible to improper influence or undue pressure, fraud, blackmail or extortion by criminal individuals or groups.

This policy highlights the requirement for Police Officers to discharge all lawful debts in accordance with the terms and conditions directed by the lender and sets the same standards on unmanageable debt to all Police Staff, Special Constabulary and embedded 3rd party representatives.

## **2. AIM OF THE POLICY**

This policy is intended to reassure all members of Wiltshire Police that should they get into financial difficulty they will receive support from the Force and signposting to appropriate support agencies if required. However, to receive the support from the force, the individual must understand their personal responsibility to disclose (see [s4.1](#) below).

All members of Wiltshire Police should be aware that indebtedness and unmanageable borrowing can pose a risk to the integrity of individual members of Wiltshire Police. In some instances individuals may become vulnerable to corruption. Any undue pressure, improper influence or manipulation of Wiltshire Police employees by criminal individuals and organisations could cause significant damage to public trust in the Police service.

## **3. DEFINITION OF UNMANAGEABLE DEBT / BORROWING**

Personal debt can be considered unmanageable when the level of required payments cannot be met through normal income streams. This would typically occur over a sustained period of time, causing overall debt / borrowing levels to increase to a level where repayments become impossible to manage.

It is recognised that the assessment of debt issues is a subjective one and each case should be looked at on its own merits. Factors such as the different categories of debt (e.g. student loans, maintenance settlements, gambling or other lifestyle issues) should all be taken into account.

However, the prime consideration is that the debt issue is being acknowledged and addressed; that the individual is taking responsibility and taking appropriate steps to manage the situation; rather than the issue being ignored in the hope that it will "go away".

## **4. RESPONSIBILITIES**

### **4.1 Individual Responsibility**

All Police Officers, Special Constables, Police Staff, and embedded 3rd party representatives directly or indirectly involved in the delivery of policing services, have a personal responsibility to ensure their financial circumstances are kept within their control and that they maintain agreed repayment schedules and amounts with lenders.

All Police Officers must be aware that under the Police (Conduct) Regulations 2020, they have a mandatory responsibility to disclose any unmanageable debt/borrowing and must discharge all lawful debts in accordance with the terms and conditions directed by the lender.

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Police Staff have obligations to discharge their borrowing repayments in accordance with consumer lending expectations. Also, the College of Policing Vetting Authorised Professional Practice recommends that the same standards of vetting including financial checks are applied to Police Staff.

All personnel in receipt of security clearance are required to notify Force Vetting of any significant change to their personal and financial circumstances

**All personnel must:**

- Familiarise themselves and comply with this policy, complementary policies and other policies issued from time to time
- Notify the Force that they are experiencing unmanageable debt as soon as it is practicable to do so (see 5 below).

## **4.2 Managers and Heads of Department**

All Heads of Department & Departmental Managers have a duty of care for Officers and Staff under their management control. Managers are expected to discuss the risks posed by indebtedness and unmanageable borrowing with their staff by way of an Integrity Health Check conducted at least annually during one-to-one meetings or as part of the ePDR process. Therefore, all supervisors should be fully aware and able to inform individuals of the support mechanisms in place to support colleagues experiencing financial and attendant difficulties.

Those employees affected by debt will be dealt with as a welfare concern unless the debt is linked to criminality or there is wilful neglect in the discharge of it. The focus will be on encouraging the individual to take action to manage their financial position.

Under no circumstances should any individual provide or offer financial advice to colleagues experiencing financial difficulties.

Managers should notify the Counter-Corruption Unit (CCU) of anyone they know to have unmanageable debt or who they suspect to be vulnerable through addictive or obsessive behaviours (for instance gambling or on-line shopping) that make them susceptible to corrupt practices or influences.

All notifications will be treated in confidence and no further disclosures will be made unless there is a statutory requirement to do so or the risk of not sharing information (for example from a health and wellbeing perspective and / or ensuring compliance with Police Regulations / Standards of Professional Behaviour) is greater than the benefit of observing confidentiality considerations. In all cases, colleagues will be treated with respect, dignity and compassion and a non-judgemental posture will be maintained at all times.

Although managers should always seek to actively support their staff through any issues with unmanageable debt and borrowing, it will not be unreasonable to point out the consequences should an individual refuse to take ownership of their situation and fail to complete a notification. In circumstances such as this, the supervisor must refer the matter to the CCU as soon as practicable.

## **5. DISCLOSURE PROCESS**

Where Police Officers, Police Staff and embedded 3rd parties incur levels of debt / borrowing that is, or is likely to become unmanageable, they must:

- **Ensure that all methods employed to resolve the situation are lawful and in accordance with current recognised procedures**

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- **Discuss the situation initially with Management**

Problems outside work can affect a person's ability to perform effectively at work and it is therefore important that line management is given the opportunity to consider the welfare of the member of staff and put in place support locally, where appropriate.

- **Disclose the matter to CCU**

Make contact with the CCU to disclose - this can be done by email [CCU@wiltshire.police.uk](mailto:CCU@wiltshire.police.uk) or by direct contact with CCU staff.

- **Consider seeking support from Occupational Health Unit**

Where appropriate, contact should be made with OHU to ensure a clinical assessment is performed. This will be to assess if any underlying health issues may be contributing to, or as a result of, their financial situation and to provide the clinician with an opportunity to advise on whether the individual is fit to fulfil their current role.

This process will follow in line with the Occupational Health Unit Policy and Occupational Health Unit Confidentiality Statement.

- **Consider seeking support from Federation/UNISON/WEPA**

Staff Associations / Trades Unions will be able to signpost and support individuals.

## 6. NON-DISCLOSURE

Wiltshire Police officers and staff must be aware of the risk to their integrity that unmanageable debt/borrowing brings and this can therefore impact on public trust in the organisation.

It is therefore important for our employees to know that a failure to disclose to the Force could have a significant impact on them. By definition, this could have a detrimental effect on an individual's security clearance or even continued suitability for employment.

In all cases, where there is evidence that an individual has wilfully failed or neglected to discharge lawful debt / borrowing, consideration will be given as to whether any misconduct proceedings are appropriate.

## 7. CONFIDENTIALITY

All information obtained, collected, processed or disclosed under the auspices of this policy will be managed in accordance with prevailing legislative and regulatory expectations and minimum standards

## 8. SEEKING SUPPORT

Those in need of support as a consequence of unmanageable debt are encouraged to seek support at the earliest opportunity.

Whilst Wiltshire Police is unable to recommend any one support organisation, individuals (or managers seeking to support an individual) will be able to obtain support from:

- Occupational Health Unit
- [Police Federation](#)
- [UNISON](#)
- [Wiltshire Ethnic Police Association](#)

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## APPLICABILITY

This policy applies to all Police Officers, Special Constables, Police Staff, and embedded 3rd party representatives directly or indirectly involved in the delivery of policing services. While this policy may not apply to all third Party personnel, they should be made aware of their responsibility to comply with the principles enshrined in the Code of Ethics.

## LEGAL BASIS AND DRIVING FORCE

- Police Act 1996
- Data Protection Act 2018
- Police (Conduct) Regulations 2020
- Police (Complaints and Misconduct) Regulations 2020
- Human Rights Act 1998
- Employment Rights Act 1996
- Official Secrets Acts
- Standards of Professional Behaviour
- Code of Ethics
- Vetting Codes of Practice / APP

## RELATED POLICIES, PROCEDURES and OTHER DOCUMENTS

[Gifts & Hospitality Policy](#)

[Vetting APP](#)

[Ethical Interviews Procedure](#)

[NPCCAG Abuse of Position for a Sexual Purpose strategy](#)

[Force Values](#)

## AUTHORISED PROFESSIONAL PRACTICE

[APP > Professional standards > Vetting.](#)

## DATA PROTECTION

Any information relating to an identified or identifiable living individual recorded as a consequence of this procedure will be processed in accordance with the Data Protection Act 2018, General Data Protection Regulations and the Force [Data Protection Policy](#).

## FREEDOM OF INFORMATION ACT 2000

This document has been assessed as suitable for public release.

## TRAINING REQUIREMENTS

While there are no specific training requirements under this policy, it is referenced as part of the annual Integrity Health Check to be conducted by all supervisors with their staff.

Therefore, all line managers should be familiar with the content of this policy and its relevance to the prevention of corruption and be prepared to provide members of their staff having issues such as this with support and signposting to enhanced support and advice.

## MONITORING AND REVIEW

The Counter-Corruption Unit will maintain data in relation to members of Wiltshire Police and individual's subject of this policy. This will be treated confidentially and stored securely and will not be available on the Force wide system.

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This information, along with feedback on the content of the policy from policy users, will be used to monitor the efficiency and effectiveness of the policy.

This Policy is owned by the Professional Standards Department. The Head of the Professional Standards Department will ensure that this policy is reviewed annually.

### **WHO TO CONTACT ABOUT THIS POLICY**

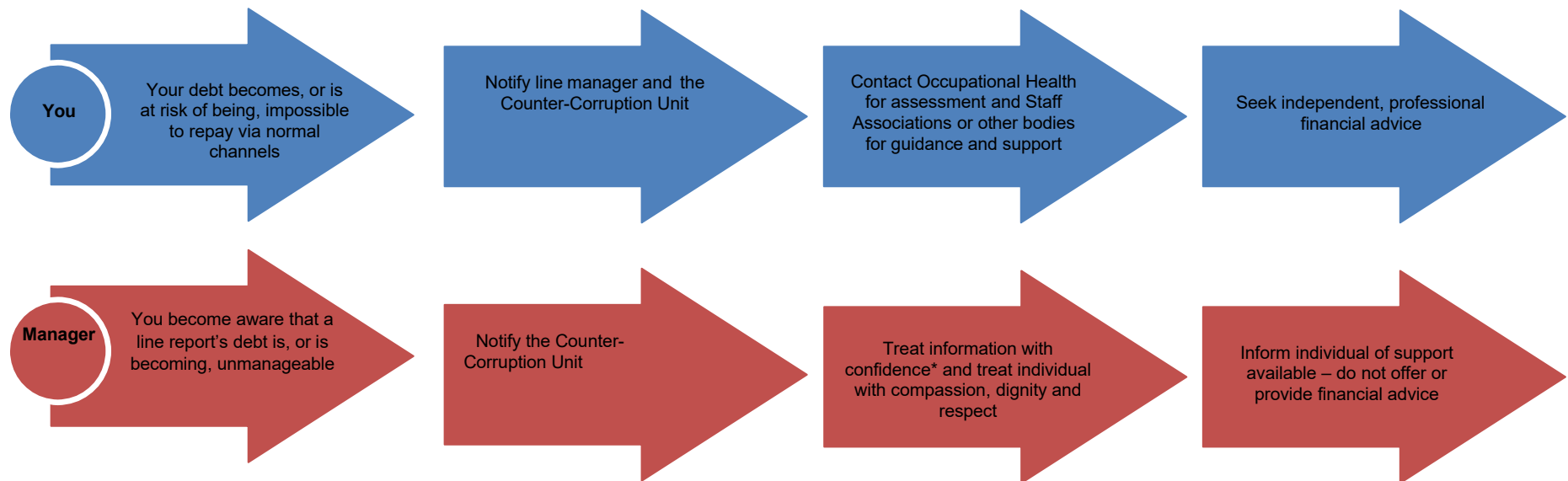
The Head of Professional Standards is responsible for this policy. The DI CCU is responsible for all Unmanageable Debt reports into Professional Standards. Contact can be made with the department by the following means – Email: [CCU@wiltshire.police.uk](mailto:CCU@wiltshire.police.uk)

# The Unmanageable Debt Process



Unmanageable Debt  
2021

August



\* Unless there is a statutory requirement to disclose the information or if the risk of not disclosing the information (for example, from a Health and Wellbeing perspective or if there is a risk of non-compliance with Police Regulations / Standards of Professional Behaviour) outweighs the benefit of keeping the information confidential.



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## DOCUMENT ADMINISTRATION

### Ownership:

Department Responsible: Professional Standards Department  
Policy Owner/Author: Supt Steve Cox / DS Troy SMITH  
Technical Author:  
Senior Officer/Manager Sponsor: Deputy Chief Constable

### Revision History:

Revision Date	Version	Summary of Changes
26.06.2018	2.0	Layout restructured and additional text added to provide more clarity in relation to individuals responsibilities, the importance of acknowledging a debt problem and the disclosure process. No substantive changes made.
15.03.2021	3.0	Restructured, greater clarity provided in line with 2020/2021 changes to both national policy, local policy and internal processes.

### Approvals:

This document requires the following approvals:

Name & Title	Date of Approval	Version
Continuous Improvement Team	22.03.2021	3.0
SCT/ACC/ACO* *(Delete as appropriate)	N/A no substantial amendments made.	
JNCC (Not required for all policies)	N/A no substantial amendments made.	

### Distribution:

This document has been distributed via:

Name & Title	Date of Issue	Version
E-Brief		
Email to relevant affected Staff/Officers		
Other		

### Diversity Impact Assessment:

Has a DIA been completed? If no, please indicate the date by which it will be completed. If yes, please send a copy of the DIA with the policy.	<input type="checkbox"/> Yes <input type="checkbox"/> No Date:
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### Consultation:

List below who you have consulted with on this policy (incl. committees, groups, etc):

Name & Title	Date Consulted	Version

### Implications of the Policy:

#### Training Requirements

See Training Requirements section above.

#### IT Infrastructure

No additional IT infrastructure required.