Debt Management

Policy & Procedure

OFFICIAL

Government Security Classification Scheme	*Policy section:* **OFFICIAL - Force website approved** *Procedure section:* **OFFICIAL - Force website approved**
Department of Origin	Professional Standards – Anti-corruption Unit PSD / ACU)
Policy Holder	Head of PSD
Policy Author	Detective Inspector Adam Cooke
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Policy

National Context

Authorised Professional Practice (APP) is produced by the College of Policing as the official source of professional practice on policing. All officers and staff are expected to have regard to APP in discharging their responsibilities. Essentially, our "policy" is to comply with APP as it develops to cover all areas of policing.

Statement

Merseyside Police expects police officers and police staff members to take responsibility for managing their personal finances and discharge all lawful debts in accordance with the terms and conditions directed by the lender.

This policy outlines the support available, both internally and externally, to help employees discharge debts or request financial support following events such as a bereavement or incapacity. It also provides details of organisations that can provide grants, loans and or advice to officers or staff about what to do when debt becomes unmanageable.

Aims

This policy is designed to provide guidance and support to members of Merseyside Police who may be suffering financial constraint.

Objectives

This section should detail the individual objectives needed to deliver the broad aims. Each objective should be specific, measurable, achievable and realistic. This is necessary to enable future evaluation of whether the objectives have been achieved.

Application and Scope

This policy applies to all police officers and police staff. It does not apply to those individuals who have entered into a personal agreement directly with a creditor, i.e. to pay a reduced sum on a credit card account, but would apply if a debt collection agency was involved.

Where the term 'employee' is used in this policy, this means all of the above.

Outcome Evaluation

Outcomes should reflect the above objectives. Success in achieving desired outcomes will be measured on an annual basis. Activities involved in measurement will be determined by the Chief Superintendent Head of Professional Standards Department and included in a separate deployment plan.

Procedure

Version History

Version Number	Date	Detailed rational behind amending/updating policy or procedure.	Policy Owner Details	Policy Author Details
1.0	00/04/22	N/A		
1.1	02/06/25	APP Counter Corruption. Update formatting / layout to reflect current Force standard template.	PSD/ ACU	DI ACU
1.2	08/06/26	Updated to reflect current force structure; formatting refresh (no change to review date)	Ch/Supt. PSD/ ACU	DI ACU

1. Merseyside Principles

1.1 Individuals who are experiencing financial difficulties may be more vulnerable to corruption. They can be targeted by criminals who are aware of their situation, or they may believe that the only way to remain solvent is to engage in unlawful activities for financial gain.

1.2 The Force relies on the honesty and integrity of its officers and staff and expects them to adhere to the Code of Ethics. As public servants, employees are expected to observe the highest standards of conduct, in both their private lives and at work.

1.3 The Force encourages those who experience financial difficulties or where personal debts can be considered unmanageable, i.e. the amount of the repayments cannot be met through normal income streams so are beyond that which somebody is able to pay, to seek advice, help and guidance at the earliest opportunity.

1.4 The Force may refer any report of indebtedness to Professional Standards Department for investigation, however, this must not dissuade employees who find themselves in financial difficulties from seeking help or advice as this may mean problems that could have been resolved at an early stage could escalate and lead to civil proceedings or court judgements.

1.5 The Force does not seek to govern or unnecessarily restrict an aspect of an employee's private life, nor does it attempt to prescribe what the decision or outcome should be, therefore all cases will be considered on their own merits and the action taken will be appropriate and proportionate in order to protect the integrity of the Force.

1.6 The Force will consider taking appropriate action against an employee it identifies as having unmanageable debts which they have not disclosed and that have impacted on their conduct or performance as follows:

- Disciplinary action (police staff); or
- Misconduct action (police officer).

2. Responsibilities of Employees

2.1 Employees are responsible for:

- Disclosing any unmanageable debt and or if they are subject to:
    - County Court Judgements;
    - Individual Voluntary Agreements;
    - Bankruptcy;
    - Other court orders; or
    - Debt management plans.
- Emailing and outlining to the appropriate person/s (Force Vetting Unit, their line manager, senior employee relations advisor, departmental head) their:
    - Role;
    - Level of debt;
    - Relevant dates; and
    - Any forthcoming court proceedings.
- Provide any further information and documentation required by the Force Vetting Unit, as and when requested.
- Accepting that, if their debts mean they are no longer deemed suitable to continue in a role that their departmental head will seek to identify if an appropriate one is available in the same department or, if not, Detective Superintendent ACU and Vetting will identify a suitable role in another part of the Force in consultation with the relevant Senior Employee Relations Adviser. There is no guarantee that they will be able to return to their previous role once the debt matters have been resolved but they can appeal using the Vetting Policy
- Accepting that, their debts may mean they are no longer deemed suitable to continue in their current role.
- Recognising that their debts may mean they are unable to apply for roles which require enhanced level vetting. They can seek to regain an enhanced vetting status on resolution of their financial circumstances.

- Acknowledging that any business interest they have will be reviewed by the Detective Superintendent ACU, via their line manager and or departmental head, to ensure that any ongoing business interest is not contributing further to their debt or ability to discharge it.

3. Responsibilities of Appropriate Person

3.1 The appropriate person is responsible for:

- Requesting jointly with a relevant line manager, that the employee completes a financial questionnaire.
- Arranging an Ethical Interview meeting or exploratory Vetting interview with the employee and or a relevant line manager so that there can be an open discussion about the employee's financial situation.
- Discussing:
  - Their financial circumstances;
  - The nature of their role and the vetting level required;
  - Their completed financial questionnaire;
  - Complete any paperwork required by the Vetting unit
  - A debt management plan (signposting the relevant assistance for completion of the plan);
  - Relevant support networks i.e. an accredited debt agency, Police Federation, Unison or GMB; and
  - Any business interests which they have.
- If they require professional support, providing them with the contact details of an accredited debt agency and notifying the employee that their financial questionnaire will be forwarded to the Professional Standards Department.

4. Responsibilities of Line Manager

4.1 Line managers are responsible for:

- Arranging regular meetings with individuals following their initial meeting with the appropriate person/line manager to discuss their debt management and determine if they need any further support.
- Considering positively any requests to take annual leave, lieu time or flexi for the purpose of attending meetings to address unmanageable debt.
- Informing the individual that additional support is available from the Police Federation, UNISON and GMB. In limited cases, access may be granted to the Police Federation Loan Fund or the Force Benevolent Fund.
- Telling them that the Force chaplaincy service provides a support and confidential listening service to all individuals of any or no faith. Contact details are available via the Force Chaplaincy webpage.

- Forwarding confidential documents, such as attachment of earnings orders or copies of civil court judgements, to their senior employee relations advisor.
- Forwarding letters from banks and other financial institutions which allege an individual is in debt to their senior employee relations advisor.

5. Responsibilities of Senior Employee Relations Advisor

5.1 Senior employee relations advisors are responsible for:

- Arranging for appropriate action to be taken before having confidential documents, such as attachment of earnings orders or copies of civil court judgements, filed on the individual's personal file.
- Deciding whether to refer correspondence from financial institutions alleging an employee is in debt to:
    - the departmental head;
    - Finance and Business Support Department; or
    - Professional Standards Department,

  for them to consider and potentially process in accordance with this policy.

6. Responsibilities of Professional Standards Department

6.1 Professional Standards Department / ACU are responsible for:

- Checking the financial questionnaire for any alleged criminal conduct, breach of Police Regulations or the Code of Conduct for police staff and considering discipline or misconduct proceedings.
- Making a record of the discussion, any decisions made and any documentation supplied will be placed in your personal file, marked 'Confidential'.
- liaising the Force Vetting Unit where appropriate.

7. Responsibilities of Force Vetting Unit

An employees personal circumstances can change at any time. It is therefore important that their ability to maintain vetting clearance is reviewed at key points throughout the clearance validity period.

Changes in a vetting clearance holder's personal circumstance in relation to their financial status must be reported to the appropriate vetting authority as soon as possible.

7.1 The Force Vetting Unit is responsible for:

- Reviewing the employee's vetting status where debt has been disclosed or identified.
- Additional considerations to be given if their clearance is Management Vetting (MV), Security Check (SC) or Developed Vetting (DV); or the role makes them particularly vulnerable.

On receipt of the information the force vetting unit will undertake a focused vetting review. They will assess all new information provided and conduct any related checks and enquiries required for the specific Vetting level. These reviews will not always require a full Vetting review or new vetting application form. If a more in-depth review is required the Vetting Unit will liaise with the employee.

Failing to disclose relevant information may result in a referral for misconduct. This could lead to vetting clearance being downgraded or withdrawn.

8. Compliance

8.1 This policy complies with the following legislation and guidance:

- Police Regulations 2020 (6, Schedule 1, Annexe AA)
- APP National Decision Model/Code of Ethics
- APP Professional Standards
- APP Counter Corruption – Prevention
- Colleague of policing Vetting APP 2025