Lincolnshire Police

Policy Document

Unmanageable Debt Policy PD 200

Policy document information

Reference number:	PD 200
Policy sponsor:	DDC Debenham
Policy owner:	Head of PSD – Supt Deborah Clark
Author:	DI Andy Wright-Lakin ACU
Publication date:	November 2025
Review date:	November 2027

Version history

Version	Date	Reason for issue
5	November 2019	Biennial Review – minor amendments
6	November 2021	Biennial Review – minor amendments
7	November 2023	Biennial Review – minor amendments
8	November 2025	Biennial Review – minor amendments

Code of Ethics

All staff involved in carrying out functions under this policy and associated procedures and appendices will do so in accordance with the principles of the Code of Ethics. The aim of the Code of Ethics is to support each member of the policing profession to deliver the highest professional standards in their service to the public.

Legislative compliance

This document has been drafted to comply with the principles of the Human Rights Act. Proportionality has been identified as the key to Human Rights compliance, this means striking a fair balance between the rights of the staff and those of the rest of the community. There must be a reasonable relationship between the aim to be achieved and the means used.

Equality and Diversity issues have also been considered to ensure compliance with the Equality Act 2010 and meet our legal obligation in relation to the equality duty. In addition, Data Protection, Freedom of Information and Health and Safety Issues have been considered. Adherence to this policy or procedure will therefore ensure compliance with all relevant legislation and internal policies.

Other legislation/law which this policy has been drafted to comply with:

- Human Rights Act 1998 (in particular A.14 – Prohibition of discrimination)
- Equality Act 2010

- Crime and Disorder Act 1998
- H&S legislation
- Data Protection Act 2018
- Freedom Of Information Act 2000

Security classification

Policy to be published on Intranet: Yes

Policy to be published on Force Website: Yes

Authorised Professional Practice (APP)

This policy has been checked against APP and there is none in relation to the subject matter of this policy.

1. Policy aims (Purpose)

1.1. Lincolnshire Police recognises that individuals may from time to time face financial hardship which could in turn lead to civil court proceedings resulting in County Court Judgements (CCJ), Individual Voluntary Agreements (IVA), Bankruptcy or other court orders.

1.2. It will often be the case that an individual employee may be saddled with unmanageable debt through little or no fault of their own. The purpose of this policy is to provide guidelines to assist individuals with debt, whilst also ensuring that the integrity and security of Lincolnshire Police is protected. It is acknowledged through research that officers and staff having unmanageable debts are particularly susceptible to corrupt approaches from Organised Crime Groups.

1.3. If the level of debt owed by an employee of Lincolnshire Police or by someone for whom they have financial responsibility, e.g., spouse or partner, becomes unmanageable, he or she should be encouraged to seek advice, help and guidance at the earliest opportunity.

1.4. Declaration of potentially unmanageable debt at the earliest opportunity is encouraged and by doing so all Officers/Police Staff will render themselves less likely to be subject of adverse consequences in terms of their role within the organisation. The overarching aim is to gain support for the employee whilst maintaining the integrity of the organisation.

1.5. If individual members of staff properly disclose and take all reasonable steps to resolve debt problems and discharge all lawful debts in accordance with this Policy, then Lincolnshire Police will offer all reasonable help and support to the person concerned. This will be to determine a way of resolving the issues and protecting their employment status with Lincolnshire Police and in so doing minimising any likelihood of the individual being subjected to misconduct proceedings.

1.6. Having unmanageable debt is not in itself a misconduct issue unless there are aggravating circumstances which make it so; obviously each case will have to be examined on its own merits.

2. Policy statement (Key information)

2.1. This policy will apply to all Police Officers, Police Staff (including permanent staff, temporary staff, those on fixed term contracts and volunteers) and Mitie employees under the contractual agreement.

2.2. Employees of Lincolnshire Police are expected to discharge all lawful debts in accordance with the terms and conditions directed by the lender.

2.3. Police Officers should be mindful of paragraph 4 of Schedule 1 of the Police Regulations 2003 which states that “A member of a Police Force shall not wilfully refuse or neglect to discharge any lawful debt”.

2.4. Equally contained within the Schedule to the 2020 Police (Conduct) Regulations under standards of Professional Behaviour it states, “Police Officers abide by Police Regulations, Force policies and lawful orders”. It follows that failing to discharge a lawful debt could amount to misconduct.

2.5. The above two paragraphs are stated to emphasise the encouragement that is being given to seek help at the earliest possible opportunity.

3. Definition of Unmanageable Debt

3.1 Personal debt will be unmanageable when the level of required repayments cannot be met through normal income streams. This would usually occur over a sustained period causing overall debt levels to increase to a level beyond that which somebody is able to pay.

3.2 Unmanageable debt includes any debt incurred by someone that a Lincolnshire Police staff member has financial responsibility for.

It will include any debt whereby a Lincolnshire staff member has liability under a contract either as a principal or guarantor.

3.3 If a Lincolnshire staff member is subject to a demand for a sum of money arising from a genuine dispute, which if payable would effectively mean it was unmanageable, the member of staff should again seek help at the earliest possible opportunity.

3.4 A demand would include a Court summons, a letter before action or a letter outlining indebtedness i.e., arrears of payments.

4. Procedure

4.1 Where an employee of Lincolnshire Police is responsible for a level of debt that either is or is likely to become unmanageable, then he or she must:

a) Disclose the situation in writing to their Division/Department Commander or Head of Unit and provide relevant updates particularly in relation to any court proceedings.
b) Notwithstanding this obligation, if an individual chooses in the first instance to bring their circumstance to the attention of the Police Federation, UNISON, Staff Association or first contact adviser for support in making the formal disclosure, then, of course, this is perfectly acceptable and understandable.
c) A relevant line manager agreed by the above together with the individual concerned will then:

- Have an open discussion with the individual around financial issues.
- Complete with the individual a financial questionnaire form PD200 appendix A. If any part of the individual's overall indebtedness is of such a sensitive or private nature that the individual wishes to withhold the nature, this is understandable, but it should in no way be undertaken in such a manner as to be misleading.

d) If following completion, it is determined that the staff member can benefit from formal advice, they must contact a Force accredited debt agency, most appropriately handled through UNISON, Staff Association or Police Federation. The financial questionnaire should then be forwarded to the Professional Standards Department and Force Vetting Unit for retention/recording and disposal in accordance with the Data Protection Act 2018.

e) Both UNISON and the Federation have a facility whereby members can receive support and advice in this area.

f) A debt management plan should be arranged in consultation with the debt agency.

g) Occupational Health can provide members of staff that are undergoing difficult circumstances support, advice, and guidance such as counselling and coping strategies.

h) The 'Bad Apple' web page has a link to debt guidance.

i) The information recorded within this procedure and following completion of a financial questionnaire (appendix A) should be forwarded to Human Resources and kept within the employee's personal file. The information retained in line with Force Policies and Procedures.

j) The information that the employee having been assessed as financially stable will be communicated to the Force Vetting Unit.

5. Professional Standards Department

5.1 The Head of the Professional Standards Department and Force Vetting Unit must be notified by the Division/Department Commander or Head of Unit when an individual makes a declaration in relation to unmanageable debt.

5.2 Likewise, if the Head of the Professional Standards Department is notified by an employee in the first instance, the information should be shared with the employee's Division/Department Commander or Head of Unit.

5.3 Communication should take place between the Division/Department Commander and Professional Standards Department and all relevant information should be retained within the Professional Standards Department / Force Vetting Unit.

5.4 Retention / disposal of any information will be in accordance with the Data Protection Act.

5.5 It is acknowledged that information supplied by individuals in relation to their finances is extremely sensitive and private and there will be no sharing or access to this information other than on a strict need- to-know basis that supports the aims of and is in accordance with this Policy.

5.6 None of the procedures outlined in this policy alleviate the need for individuals to adhere to guidelines advised to them within any Force vetting procedure i.e., to inform the Force Vetting Officer should their financial position substantially change.

5.7 Any permission to hold an outside business interest granted to an individual who subsequently suffers from unmanageable debt will be subject of review.

5.8 This review will be completed by the Head of the Professional Standards Department who will liaise with the member of staff's Division/Department Commander, the Force Vetting Officer and the Head of the Anti-Corruption Unit before deciding whether the permission should continue. This decision should be made with reference to the Business Interest Policy PD 23

5.9 All staff members of Lincolnshire Police are liable to vetting processes, the level of which depends on their role within the organisation.

5.10 Evidence of unmanageable debt may cause a review of a staff member’s vetting status. The member will be subject to a meeting with Vetting and a nominated member of the ACU to discuss the situation with a view to reviewing the possible risk of compromise and susceptibility to corruption.

5.11 If a staff member’s vetting status changes then the relevant Division/Department Commander or Unit Head or their nominees, together with the Force Vetting Officer should cause a risk assessment to be conducted in relation to the employee’s suitability to continue in their role, or whether additional provisions such as the adoption of a debt management plan is sufficient to allow an individual to continue to perform a specific role.

5.12 The greatest risk in relation to debt is when the debt is undisclosed and not properly managed.

5.13 If the individual is no longer deemed appropriate to continue in a specific role, then the Division/Department Commander or Head of Unit should seek to identify a role that is appropriate.

5.14 If there are no such roles available within the Division/Department then the employee should be assisted to identify a suitable role in another Division, Department or Unit.

5.15 Staff who have been identified as carrying unmanageable debt levels may be unable to meet vetting requirements, which could disadvantage them from applying for roles requiring an enhanced level of vetting.

5.16 They could, of course, seek to regain an enhanced vetting status when they have resolved their debt problems.

5.17 Vetting will be carried out in accordance with the National Police Chiefs' Council (NPCC) National Vetting Policy guidelines.

6. Additional Employment – Supplemental Income

6.1 It is quite acceptable for an employee to seek additional employment to assist in stabilising their financial situation if it does not impact on the welfare of the employee or the well-being of the organisation. For the employee to seek additional employment, the Business Interest Policy must be adopted and adhered to, ensuring that the Force is able to conduct a risk assessment around any such applications.

7. Support

7.1 There are a number of different organisations who can give advice and support regarding debt issues. Some of these organisations are: -

- Debt support from Citizen's Advice
- Debt Support from Police Mutual
- Debt Support Trust
- National Debt Advice Line
- Step Change
- Managing debt, information from CopperPot
- Christians Against Poverty

7.2 Please seek support if you are struggling with debt – don't suffer alone.

8. Other related documents and appendices

8.1 Appendix.

- App A – P403 Financial Questionnaire

9. Monitoring and review

9.1. The Professional Standards Department will monitor the effectiveness of this policy in liaison with the Human Resources Department.

9.2. Amendments will be made to the policy using guidance from the Home Office and/or IOPC together with any good practice from other forces or changes in legislation prior to formal review.

9.3. A formal review will be conducted every two years.

10. Who to contact about this policy

10.1. This policy is owned by the Head of Professional Standards. Any enquiries about this policy should be directed to the Detective Inspector in the Anti-Corruption Unit, acu@lincs.police.uk.