



# CHANGE OF CIRCUMSTANCES POLICY

## 1. Executive Summary

The public expect the Police Service to safeguard the rule of law, act fairly and impartially and provide a professional and impartial service. All West Midlands Police employees and Special Constables have a duty to declare a change of circumstances. A failure to do so could result in disciplinary action.

The Chief Constable has delegated responsibility under this policy to the Head of Professional Standards, who will establish appropriate procedures for the administration of the process.

## 2. Authorised Professional Practice (APP)

West Midlands Police has adopted the [Vetting Authorised Professional Practice APP](#), with supplementary information contained herein, which reflects local practice and the needs of the communities served by West Midlands Police.

## 3. Scope

The Chief Constable has overall direction and control of WMP and is ultimately accountable for all policies and supporting documents of the organisation and its actions. Adherence to this force policy will be expected from:

- all employees and representatives of WMP including Specials

## 4. Objectives

This Policy sets out the organisational procedures relating to change of circumstances whilst in a role within WMP and how that procedure can be complied with. The aim of this Policy is to:

- Provide a structured and consistent approach to dealing with change of circumstances, and to ensure parity of decision making and processes between all employees within WMP.
- Ensure that any change of circumstances does not conflict with the work of WMP employees and their ability to not only discharge their duties impartially, but to be seen to be doing so by the community.
- Secure the maintenance of the professional image and integrity of the Police Service.
- Ensure that all change of circumstances is recorded and reviewed, according to the principles and standards of the Code of Ethics and the Police Staff Council Standards of Professional Behaviour.

## 5. Definitions/Acronyms

<b>DMP</b>	Debt Management Plan
<b>FPN</b>	Fixed Penalty Notice
<b>IVA</b>	Individual Voluntary Arrangement
<b>NFA</b>	No Further Action
<b>NIP</b>	Notice of Impending Prosecution
<b>PCN</b>	Penalty Charge Notice
<b>PSD</b>	Professional Standards Department
<b>WMP</b>	West Midlands Police



## 6. Policy Statements

### Change of circumstances requirements

- All WMP employees and Special Constables have responsibility to report to their Supervising Officer/Line Manager of any changes to individual circumstances which may be of relevance to their clearance / vetting.
- It is imperative that any changes in an individual's circumstances are reported to PSD as soon as practicable after the change has occurred.
- Any information provided will be treated in confidence.
- While confidence will be maintained as much as possible, there will be occasions where it is proportionate and necessary to disclose the information to other units, such as PSD or Counter Corruption.

### Types

This is a list of Declarable Types of Changes of Circumstances.

Each type has been paired with examples (*This is not an exhaustive list*).

It is imperative that any changes in an individual's circumstances are reported via the corresponding Change of Circumstance online form as soon as possible after the change has occurred.

### ADDRESS

- Change of home address

### CO-RESIDENTS

- Co-habitant details i.e. anybody residing at the same address
- Undeclared person has moved into your address (i.e. new partner / child of partner)
- New Lodger / Flat Mate
- Previously declared person has now moved out of the address (i.e. ex-partner)

### FAMILY MEMBERS

- Changes in Marital Status or Civil Partnership
- Break Down of Relationship
- Change of Name
- Change in Relationship / Partner (at the earliest possible opportunity in commencing a relationship)
- Children over the age of 10<sup>1</sup>

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<sup>1</sup> Force Vetting Units will accept children over 10 being declared at point of next vetting unless any of the other above points apply



### NOTIFIABLE ASSOCIATION

- Known / suspected Notifiable Association – i.e. someone who could compromise a member of WMP, compromise investigations conducted by WMP or partner agencies or jeopardise the trust and confidence that communities have in the police service.

### CRIMINAL/CIVIL OFFENCES

- Involvement in a criminal investigation as a suspect (including NFA outcomes), DA non-crimes and neighbour disputes<sup>2</sup>
- Interviewed Under Caution (By Any Agency)
- Arrested (By Any Agency)
- Criminal Conviction or Caution;
- Criminal Allegation Made Against You
- Named Suspect
- Fixed Penalty Notice
- Civil Court Order
- Community Resolution or Restorative Justice
- Caution (Juvenile or Adult)
- Charged / Convicted
- Conditional Absolute Discharges
- Bind Overs

### DRIVING/VEHICLE OFFENCES

- Fixed Penalty Notice (FPN) – Crime or Traffic
- Notice of Impending Prosecution (NIP),
- Driving Improvement Scheme (when date for course confirmed) OR Speed Awareness Courses (or similar)
- Speeding Penalties
- Penalty Charge Notices (PCN)

### FINANCES

- A significant negative financial change in yours or your Spouses/Partners circumstances
- Bankruptcy / Debt Relief Orders / CCJS
- Adverse county / sheriff court judgement;
- Entered into an Individual Voluntary Arrangement (IVA) or Debt Management Plan (DMP);
- Change to Business Interests
- Any Other Form of Restorative Justice
- Receiving of lump sums over £5,000<sup>3</sup>

### VETTING

- Failure of vetting in another force at application and appeal

<sup>2</sup> WMP employees who are victims of crime do not need to submit a change of circumstances

<sup>3</sup> The exception to this is Payments from critical illness insurance and an inheritance from immediate family members (definition as per Notifiable Associations Policy)



## **Applications**

- This procedure explains the process to be followed by all WMP employees and Special Constables who wish to notify PSD of any change of circumstance and the key principles that will be considered in assessing the circumstances. This should be completed through immediate line management via the Change of Circumstances portal:

## **Change of Circumstances**

- It is essential that a comprehensive level of detail is provided to explain exactly what the situation is. Those who do not provide the required level of detail may be contacted for further information.
- The relevant line-manager will consider the change of circumstances form and make their own remarks.
- Failure to comply with change of circumstance requirements may result in referral to misconduct and or a vetting review.

## **Review by PSD**

- Change of circumstances will be logged by and assessed by PSD. Any applications which lack detail, are incomplete or not properly written with line manager comments will be returned. Where necessary, information may be sought from other departments, forces, agencies and open-source checks. This will be to consider the risk posed by the change of circumstances to both the individual, force and public, considering:
  - Nature of the change of circumstances
  - Potential for a conflict of interest between the individual's role within the force
  - Whether the change of circumstance causes the individual to associate with known criminals/person of interest to the police
  - Compatibility with any future roles
  - Applicant's current performance
  - Current misconduct investigations or live sanctions relevant to the applicant
- The form will be checked and processed by the owning department within PSD. If there are no concerns with the change of circumstances, it will be recorded on vetting and/or PSD systems but will not always result in any follow up to the person submitting.
- In rare circumstances where the declaration indicates that there is the requirement to remove vetting from an applicant, this will be communicated.
- On some occasions additional risk management may be appropriate, considering the policing role and the specific circumstances. In these cases, PSD will refer to the below policies:
  1. [Notifiable Associations](#)
  2. [Service Confidence Policy](#)



### **Line Managers**

- When line managers are informed that a member of the team has had a change of circumstances they are required to direct the individual to complete and submit the necessary change of circumstances form(s) in a timely manner.
- It is good practice to have a discussion with the team member about the change of circumstances concerned and make a recommendation(s) in terms of an appropriate course of action. A record of the conversation should be recorded by the line manager.
- Once the appropriate form has been submitted the line manager part of the form will be emailed to complete online. This needs to be completed in as much detail as possible, including information around any discussions had and any actions taken.
- If multiple forms are being submitted for one individual then this should be included as well as how many are expected.
- Line managers have responsibility to manage staff throughout the year as part of the annual integrity health check whether there are any changes of circumstances that have not been submitted.
- Should a person move role, it is the responsibility of the person to update their new line manager of any changes of circumstances having an ongoing impact.

### **Annual Integrity and Vetting Review**

- The annual integrity and vetting review will be completed annually and compliance with this process will be monitored by PSD. This may remind individuals of change of circumstances that need to be submitted. In such cases individuals must complete necessary requirements with immediate effect to comply with policy. However, the expectation is not to wait for annual integrity or vetting review processes.
- Line managers should ensure that each of their staff members have complied with the requirements and that they have a meaningful discussion with those under their supervision to ensure it has been understood.
- Vetting APP makes it clear that vetting clearance can be withdrawn for those failing to comply with the requirements of the annual integrity and vetting review without reasonable justification. Failure to comply may also be referred to misconduct or unsatisfactory performance procedures. Equally lack of compliance or engagement by line managers may also be referred to misconduct or unsatisfactory performance procedures.

## **7. Relevant Legislation / Policies / Procedural Guidance**

- [Change of Circumstances Line Manager Step by Step Guide](#)
- [WMP Notifiable Associations policy](#)
- [WMP Service Confidence Policy](#)

## **8. Equality Impact Assessment**

WMP places trust in their employees to comply with force policies and to work in accordance with and in support of:



WMP Vision and Values  
Code of Ethics | College of Policing

	What impact has this policy <b>had</b> on the nine protected characteristics in relation to the three general duties? (If applicable)	How <b>will</b> this updated policy positively impact each of the nine protected characteristics in relation to the three general duties? If not, explain why it will not.
<b>Age</b>	No identified concerns	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.
<b>Disability</b>	No identified concerns	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.
<b>Gender Reassignment</b>	No identified concerns	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.
<b>Pregnancy &amp; Maternity</b>	No identified concerns	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.
<b>Marriage &amp; Civil Partnership</b>	No identified concerns	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.
<b>Race</b>	Evidence of disproportionate reporting for notifiable associations by colleagues based on race.	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.  Additional control measures are in place with regards to any potential disproportionality or impact, details are shared with SEG and risk mitigation protocols in place to support the individual.
<b>Religion or Belief</b>	No identified concerns	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.
<b>Sex</b>	No identified concerns	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.
<b>Sexual Orientation</b>	No identified concerns	This policy supports the National Vetting APP and provides a force level framework for consistency and guidance.



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**10. Publication Instructions**

Suitable for publication to public.

**11. Document Control**

<b>Strategic Lead:</b> <i>[role and name]</i>	Chief Superintendent [REDACTED] – Head of PSD
<b>Policy Author(s):</b> <i>[role and name]</i>	Inspector [REDACTED] - PSD
<b>Effective Date:</b>	26/02/2026
<b>FET Lead:</b> <i>[role and name]</i>	DCC Green
<b>Version Number:</b>	v1.2
<b>Review Date:</b>	07/04/2027

Any enquiries in relation to this policy should be made directly with the Strategic Lead.

All policies are subject to a formal consultation process which encompasses Legal, Professional Standards, Faith Groups, Trade Unions, Independent Advisory Groups and wider force groups and any other relevant parties. A record of consultation can be found on the Policy Portal.

It is responsibility of the Strategic Lead to ensure that all links within the policy are correct and accessible.

**Amendment History:**

Version Number:	Effective Date:	Summary of Amendments:	Author:
1.1	28/08/25	Minor amend – Addition of Speed Awareness Courses (or similar)	[REDACTED] / [REDACTED]
1.2	26/02/26	Minor amend of types – addition of 'failure of vetting in another force'	[REDACTED] / [REDACTED]