



Submission to

The Police Remuneration and Review Body

on behalf of

the Police Federation of England and Wales (PFEW)

and

the Police Superintendents' Association (PSA)

7th February 2020

7 February 2020

To: The Chair of the Police Remuneration Review Body, Ms Anita Bharucha

Re. Sixth submission to the PRRB, from the Police Federation of England and Wales, and the Police Superintendents' Association, dated 7th February 2020

Dear Ms Bharucha

We are pleased to enclose the sixth submission to the Police Remuneration Review Body. This is a joint submission provided on behalf of the Police Federation of England and Wales (PFEW), and the Police Superintendents' Association of England and Wales (PSA).

This year's submission comes in the context of an extraordinary and welcome reversal of policy by Government, with the announcement of an uplift of 20,000 additional officers to be recruited. This will return the service to around the level of 2010. Coming after years of reducing numbers and austerity measures, while crime continues to evolve, this boost is long called for, and much needed.

The challenge for Government now is to make good on this promise. That will require radical rethinking of the current measures for recruiting and retaining officers. If the current pay design remains then forces will be attempting to recruit 53,000 applicants over 3 years: many to roles where they are expected to both study for a degree and undertake duties that can be distressing and dangerous, for a starting salary just a few pence per hour above National Living Wage. Financially, this does not compare well to other opportunities in teaching, firefighting, and beyond.

Likewise, there is a desperate need for the existing pool of experienced and talented officers to be incentivised to remain: and yet they have seen their pay drastically eroded compared to inflation, and their pensions worsened.

We are aware that the NPCC has pared back some pay reform plans, and started to consider

measures to aid retention, such as increasing the maximum Variable payment from £4,000 to £5,000. But we believe the changes suggested thus far are likely to be inconsequential in the face of such an enormous need to attract recruits from all backgrounds to enter policing, and encourage existing officers to stay.

We therefore ask the Police Remuneration Review Body to consider much more radical suggestions. We believe these will be necessary to support Uplift 20,000, and avoid what could be a catastrophic failure to be able to adequately resource the police service.

In our submission we make 20 recommendations. These include the removal of the lowest 2 pay points for Constables, to facilitate recruitment; the shortening of the Constables' and Sergeants' pay scales and the introduction of new top pay scale points for all ranks, to incentivise retention; and a pay uplift of 5% across the board.

In previous years we have been pleased by the willingness of the PRRB to think independently of Government. This year in particular we hope that you will consider the heart of the issues facing policing, without being wedded to pay reform plans that were developed in response to different needs, in different times.

As ever, we are grateful for your consideration of our evidence, and look forward to your recommendations.

Yours faithfully,



Alex Duncan, National Secretary of PFEW



Dan Murphy , National Secretary of PSAEW

*This submission was prepared by
PFEW Research and Policy Department
on behalf of
the PFEW and PSA National Secretaries.*

*Requests for further information or reports referred to within the submission
should be made to Dr J Donnelly, joan.donnelly@polfed.org*

Table of Contents

	List of Annexes	7
	Note all annexes are supplied in a separate electronic file.	7
	Lists of Tables and Figures.....	8
	List of Recommendations	10
1	Chapter 1 Executive Summary	11
1.1	The remit letter	11
1.2	Chapter structure.....	12
1.3	Summary of the context.....	13
1.4	Summary of the status of pay reform, and our positions	14
1.5	Summary of matters in the remit letter focus beyond pay reform: the uplift .	20
2	Chapter 2 Context.....	24
2.1	Current officer numbers and 20,000 uplift.....	24
	Case study – West Midlands	25
	20,000 Uplift: recruitment challenge	28
	20,000 uplift: retention challenge	34
	NPCC National Reward Team response to 20,000 Uplift	35
	Effects on other initiatives	37
2.2	Current context – Officers’ perspectives	42
	Morale and feeling valued: thoughts on impact on new joiners.....	42
	Officers’ views on pay	44
3	Chapter 3 Pay reform	47
3.2	Benchmarking.....	48
	Our position	48
	The NPCC NRT Benchmarking	48
	The staff associations’ benchmarking	51
	Constables.....	53
	Sergeants	55
	Inspectors	56
	Chief Inspectors.....	57
3.3	P factor	59

	Our position	59
	Possible metrics.....	60
	Valuation.....	64
3.4	“Variable pay” – proposals for hard-to-fill and uplift	65
	Our position	67
	Case study: Competency Related Threshold Payments and Special Priority Payments: Eligibility (access); applications; success rates	71
	Case study: Targeted Variable Payments, Superintending ranks: Eligibility (access); applications; success rates.....	72
	Variable pay: an alternative way forward	73
3.5	Constables’ pay scale.....	75
3.6	Sergeants’ pay scale	79
4	Chapter 4 Staff Associations’ perspectives on matters that the remit letter stated would be covered in the NRT submission	81
4.2	Impact of pay reform.....	81
	Benefits realisation	81
	Equality Impact Assessment.....	83
	The Brown Principles.....	85
4.3	Consideration of proposed salaries	88
4.4	Assessment of level of force maturity for proposed assessment points.	88
4.5	Proposed timetable for regulatory implementation.	94
5	Chapter 5 Remit letter focus (outside of pay reform).....	98
5.1	General uplift	98
5.2	Economic context	99
	Methodology	102
	Impact on real pay	104
	Constables.....	105
	Sergeants	108
	Inspectors and Chief Inspectors	111
	Superintendents.....	117
	Cost of living	122
	Recruitment	123

Police Constable Degree Apprentice Pay: Pay Point -1	124
Retention	127
Conclusion	127
5.3 Affordability	127
5.4 London Weighting (and South East Allowances).....	131
Pay and Morale survey perspectives on London and South East pay	139
5.5 Dog Handler’s Allowance	141
Background:.....	141
Value and uplift	141
Kennel hour:	141
Mileage:	142

List of Annexes

Annex A: DCW report – headline	143
Annex B: FOI – Recruits	143
Annex C: Leavers’ report	143
Annex D: Letter to Home Office (Peter Spreadbury) and reply	143
Annex E: Peer-reviewed Journal Articles and Conference Papers	143
Annex F: Letter to NPCC lead, 8 November	143
Annex G: EIA letter responses	143
Annex H: Explanatory note on RPI	143

Note all annexes are supplied in a separate electronic file.

Lists of Tables and Figures

Table 1: The relevant initiatives impacted by the 20,000 uplift.	38
Table 2: Dissatisfaction with pay by rank.	45
Table 3: Suggested metrics for the P factor	61
Table 4: Officers' views of discretionary pay: fairness	76
Table 5: New top of the scale points for all ranks	80
Table 6: Freedom of Information request: Proportion of officers having PDRs, by force.	91
Table 7: Home Office Provisional 2020-2021 Settlement: Impact With CPIH Calculated	129
Table 8: Table Showing Forces' Ability to Afford Recommended Uplift	130
Table 9: Average House Prices by Region: data from Her Majesty's Land Registry.	133
Table 10: Difference Between Maximum Mortgage at Top of Constable Pay Scale, and Average Regional House Price.	134
Figure 1: Years in Service and Rank by Force 2017-2018	26
Figure 2: Years in Service and Years in Rank by Force 2018-2019	27
Figure 3: Joiners and Leavers over the last 15 years.	29
Figure 4: Proportion of respondents agreeing that staying in the police was a matter of necessity as much as desire (by length of service).....	44
Figure 5: Constables 2-4 years' service, and comparable roles.....	54
Figure 6: Constables (after 4 years' service) and comparable roles	55
Figure 7: Sergeants and comparable roles.	56
Figure 8: Inspectors and comparable roles.....	57
Figure 9: Chief Inspectors and comparable roles.....	57
Figure 10: England and Wales: Constables' Basic Pay Gender Gap by Force	76
Figure 11: England and Wales: Proportion of Male and Female Police Officers by Force	84
Figure 12: England and Wales: Proportion of White and Non-White Police Officers by Force	84
Figure 13: Number of full time Constables on each pay point (excluding pay point -1).	99
Figure 14: Officers' settlements compared to whole economy pay growth	101
Figure 15: Police officers' pay settlements compared to CPIH, CPI, and RPI inflation, 2010-2019	104
Figure 16: Constables' Pay Point 0 Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	106
Figure 17: Constables' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	107
Figure 18: Sergeants' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs	109

Figure 19: Sergeants' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	110
Figure 20: Inspectors' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs	112
Figure 21: Inspectors' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	113
Figure 22: Chief Inspectors' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	115
Figure 23: Chief Inspectors' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	116
Figure 24: Superintendents' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	118
Figure 25: Superintendents' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	119
Figure 26: Chief Superintendents' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs.....	120
Figure 27: Chief Superintendents' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs	121
Figure 28: Comparison between the Apprenticeship Pay of £18,000 and Actual Nominal Pay from 2009 when corrected by Inflation (CPIH).....	125
Figure 29: Comparison between the Apprenticeship Pay of £18,000 and Actual Nominal Pay from 2009 when corrected by Inflation (CPI)	125
Figure 30: Comparison between the Apprenticeship Pay of £18,000 and Actual Nominal Pay from 2009 when corrected by Inflation (RPI).....	126
Figure 31: Police officer turnover (including transfers) by force from 1 April 2018 to 31 March 2019	135
Figure 32: Constables' Location Allowance Average per Police Force.....	136
Figure 33: England and Wales: All Police Officers recipients of Location Allowance per Police Force	137
Figure 34: Proportion of respondents in receipt of specific allowances who were satisfied and dissatisfied with these allowances	137
Figure 35: ONS chart showing Average house prices by English region since 2005.	139

List of Recommendations

Recommendation 1: In considering pay, prioritise how the 20,000 uplift can be achieved	35
Recommendation 2: Review the pay reform design within the new operating context	41
Recommendation 3: Work to establish common ground on benchmarking	59
Recommendation 4: Systematically review the P factor, following the steps we set out	61
Recommendation 5: Valuation of the P factor to be 14.5% (as for military)	65
Recommendation 6: Reconsider the method used for Variable pay, and the EIA	74
Recommendation 7: Independent scrutiny of the pay reform plans	74
Recommendation 8: Uplift the TVP to £5,000, and undertake recommendation 7	75
Recommendation 9: Reduce the number of pay points for Constables	78
Recommendation 10: Assumption of competence unless on UPP	79
Recommendation 11: Remove the lowest pay point for Sergeants	79
Recommendation 12: New top of the scale points should be set for all ranks, to incentivise retention	80
Recommendation 13: Produce a benefits realisation model regarding pay reform	83
Recommendation 14: NPCC's EIA to be assessed by independent, qualified professional	87
Recommendation 15: Review of the regulations and determinations drafting process.	97
Recommendation 16: Remove pay points -1 and 0: set minimum starting salary £24,177	126
Recommendation 17: An across the board uplift of 5%	131
Recommendation 18: A systematic review of the location allowances	140
Recommendation 19: London and SE Allowances increased to 150% of current values	140
Recommendation 20: Uplift Dog Handler's Allowance in line with overall uplift.	142

1 Chapter 1 Executive Summary

1.1 The remit letter

1.1.1 On the 5th of November 2019 the following remit letter was circulated.

“Dear Anita

POLICE REMUNERATION REVIEW BODY REMIT 2020/21

Thank you for your considerations and recommendations for the 2019/20 Police pay award, which as you will be aware, the Government accepted in full. I am now writing to ask the Police Remuneration Review Body (PRRB) to conduct its annual review of police officer pay and associated allowances. This will include a formal recommendation on how to apply the police officer pay award for 2020/21 to all ranks, including chief officers, and to include a review of London Weighting and Dog Handler’s allowance.

This will be based on available evidence and should be considered in the context of Government’s recent commitment to an increase of 20,000 officers over three years. This reflects the most significant officer uplift in a decade and reflects the Government’s support for a service that we value so highly. I want to empower the service to get the resources and tools it needs to get the job done. I want to make sure that the service encourages the right people to join and remain on the job and that it has a pay system that supports this.

NPCC proposals for a revised pay structure will therefore form a critical part of PRRB’s consideration. We therefore ask that the PRRB consider the following proposals, commenting in particular on their suitability and robustness:

- proposals for independent benchmarking, which will have been completed for all officer grades, including Chief Officers;
- defining and valuing the ‘P-Factor’, recognising those elements of the role which are unique to policing;
- the rationale and proposals for a range of pay interventions to support operational delivery through targeting roles that are hard to fill or critical to retain; and
- wider workforce data which is available to support the uplift of 20,000 officers.

You will be aware that the NPCC has been leading the design of police pay reform, implementation for which is now due to begin from spring 2021, to ensure that forces can manage immediate requirements of a growth in their workforce ahead of implementing pay reform proposals. We have asked for their revised proposals to be set out in their evidence submission to the review body. I would welcome your observations on these proposals which will cover the impact of pay reform, consideration of proposed salaries, an assessment of level of force maturity to meet the requirements of proposed assessment points to determine officer pay.

The NPCC also intends to set out a proposed timetable for regulatory implementation taking account of requirements for consultation with interested parties.

The Government must balance the need to ensure fair pay for public sector workers with protecting funding for frontline services and ensuring affordability for taxpayers. We must ensure that the affordability of a pay award is taken into consideration to ensure that police forces are able to maximise the additional officers that they can recruit.

As in previous years, in considering the appropriate level of pay for police officers I would also ask you to have regard to the standing terms of reference for the PRRB and to consider each matter for recommendation in the context of future reform plans. I request the report by 30 April 2020.

Thank you for your hard work in this important area and I look forward to receiving your recommendation and observations.

Yours sincerely,

Rt Hon Priti Patel MP”

1.1.2 Our submission broadly follows the structure of the remit letter, and we have endeavoured to keep only to those matters raised in it.

1.2 Chapter structure

1.2.1 Chapter 1 provides an Executive Summary. We have outlined the context for this year’s review as we see it, in Chapter 2. In Chapter 3 we set out our positions regarding the three key aspects of pay reform that are bulleted in the Home Secretary’s letter, these being independent benchmarking, defining and valuing the P factor, and Variable pay. Chapter 4 focuses on our perspectives regarding matters relating to progress on issues that, again, the Home Secretary has raised in the remit letter, and which she stresses will be included in the NRT submission, which “will cover the impact of pay reform, consideration of proposed salaries, an assessment of level of force maturity to meet the requirements of proposed assessment points to determine officer pay”. Finally, Chapter 5 provides supplementary data and addresses the key questions of “how to apply the police officer pay award for 2020/21 to all ranks, including Chief Officers, and to include a review of London Weighting and Dog Handler’s allowance”.

1.3 Summary of the context

- 1.3.1 We welcome the fact that the latest Government has stated an intention to reverse the policy of reducing officer numbers over the last 10 years, and return these to around the 2010 level of 143,765. However, this will bring its own challenges in terms of recruitment of 53,000 new officers; the need for increased numbers of Sergeants and other supervising ranks; motivation and retention of experienced mid-career officers; and – crucially – a significant experience gap, with estimates suggesting that 37% of all officers will be new in service within 3 years (and Metropolitan Police Service (MPS) Workforce Basic Command unit (BCU) figures showing that in many frontline areas it will be even higher).
- 1.3.2 The 20,000 uplift took policing by surprise. There has been no time yet to redesign the pay structures and levels to ensure they support this uplift. In absence of such work, however, it seems reasonable to suggest that if the size of the workforce is returned to 2010 levels, then if real terms pay were also returned to 2010 levels, there would be a better chance of officers' remuneration being fit to support the levels of recruitment, retention, and motivation necessary in a workforce of this size. We offer this as a theme for several of our recommendations.
- 1.3.3 One of the early impacts of the 20,000 uplift has been the effect on other initiatives, such as College work on recruitment and selection, mentoring and development, and assessment of officers. The NPCC National Reward Team (NRT) has made some adjustments to the pay proposals, but we do not believe these go far enough to address arguably the biggest, and most rapidly developing, recruitment and retention challenge that policing has ever faced.
- 1.3.4 **Recommendation 1:** Our first recommendation to the PRRB is therefore that it must focus on how pay can support the recruitment of so many new officers, and the retention of those in lower ranks whose skillsets are key to success. This must be the top priority in this year's review, regardless of any ongoing need to reform pay.

1.3.5 **Recommendation 2:** Our second recommendation must be that the pay reform design should be urgently reviewed within the current operating context. We believe that certain features – such as linking pay to assessments of performance – will need to be carefully assessed for practicality. It seems likely that the NRT will have to delay formal linkage to assessment, at least until after the design and roll-out of national PDRs, and should opt instead for an assumption of competence within the current pay progression system.

1.4 **Summary of the status of pay reform, and our positions**

1.4.1 In keeping with the remit letter, we have set out our perspective on progress with the pay reform, and our current positions.

1.4.2 Last year we stated that benchmarking is important, but that the choice of comparators is critical. We set out some that we believed would be helpful. We received the NPCC's latest benchmarking data in November 2019, which, as last year, compare officers to UK medians across the whole workforce. We were reassured by the NPCC that this is still a "work in progress", and by Korn Ferry that more than one benchmarking exercise will be undertaken, including a more targeted one against public sector roles: but we have not, as yet, seen data from such an exercise.

1.4.3 Given our continuing concerns about the inclusion and exclusion criteria used for benchmark comparators, we felt it would be sensible to consider other data, to offer an alternative perspective. We therefore conducted a rapid benchmarking exercise using data from the Incomes Data Research (IDR) database. IDR had determined job levels for each rank, and we compared these to a number of public sector roles where there was some element of risk, and shift work (as in policing). The IDR data tell a very different story to the Korn Ferry data. At every rank, there is a discrepancy between the highest average pay in the category, and officers. For Constables the highest pay for a comparable benchmark role outside policing is at least £7,500 above officers' pay, and for Inspectors the highest benchmark salary is £9,595 above. This may not be surprising given the different methodologies, but it

demonstrates the necessity of agreeing the method first before benchmarking outcomes can be used in a meaningful way.

- 1.4.4 **Recommendation 3:** With regard to the benchmarking element of the pay reform, our recommendation is that we continue to work closely together to establish common ground as to the underpinning benchmark methodology, and inclusion and exclusion criteria for this. We believe that the current work is not based on adequate inclusion and exclusion criteria for benchmarking. Furthermore, it is taking too long, and we would wish to see it driven faster in the interests of ensuring officers get a fair deal compared to other organisations.
- 1.4.5 Last year we stated that the P factor is the element of reform where there was most agreement. This is a topic where there has been some collaboration, and we have worked with the NRT on possible metrics. We are aware the NRT had hoped for an independent valuation by the Office of Manpower Economics, but this was not possible. We have suggested a number of steps that might be taken in order to derive a robust and defensible measure and associated valuation. We would wish to be part of that process. In the meantime, we see no evidence that causes us to move away from the valuation we sought for the P factor last year.
- 1.4.6 **Recommendation 4:** It is recommended that over the coming year a systematic approach to the valuation of the P factor is undertaken, perhaps following the steps suggested by the staff associations.
- 1.4.7 **Recommendation 5:** Until such time as a systematic evaluation is undertaken, the P factor should be assumed to be 14.5%, in keeping with the military X factor.
- 1.4.8 We acknowledge that it is critical to the recruitment and retention of officers that something is done to reward officers that are in hard to fill or challenging roles. But we are concerned that this is the area of least systematic progress, and if anything there has been a retrograde step. Last year the NRT categorised Variable pay into 4 groups, and we hoped this was the beginning of a classification that would allow a narrative to be developed. The NRT also

sought for the “temporary” bonus payments that had already been introduced to be extended. In the last 12 months the discussion of categories of Variable pay has largely been abandoned, and only the bonuses – now known as Targeted Variable Payments (TVPs) – remain on the table. This takes us further from being able to see a common underpinning philosophical or moral rationale for the payments, other than that Chief Constables want to have discretion because they believe these will help.

- 1.4.9 We believe that the way these are being introduced poses a number of risks for the service, including: creating further inequalities; demotivation; force “bidding wars”; moving recruitment and retention problems from one role to another; and conversely a risk that these will not be used, as Chief Constables do not want to risk litigation. Interestingly the NRT’s own research surveying forces and running focus groups with officers suggest that all these issues have been raised directly by officers and Human Resource (HR) departments too.
- 1.4.10 We are extremely concerned about these matters, and have provided an alternative way forward within this submission. The staff associations are left in an invidious position on this matter, as we are of course keen that officers can access funding that we know is available. But we also have a duty to members to ensure that equality laws are complied with, and that they are all fairly treated.
- 1.4.11 **Recommendation 6:** it is recommended that the NPCC reconsider the method currently being used to introduce Variable pay. The NPCC must, as a matter of urgency, provide an acceptable EIA on this. We have sought to have visibility of the NPCC legal advice.
- 1.4.12 **Recommendation 7:** Last year the PRRB sought for the NPCC to seek independent scrutiny of their pay reform plans. This has not been done. We echo that recommendation.
- 1.4.13 **Recommendation 8:** We recommend that the PRRB accept the NPCC’s recommendation that the bonus is uplifted to £5,000: but we seek for recommendation 7 to also be accepted.

1.4.14 Revisions of the Constables' pay scale have been a core part of the pay reform agenda. In August we attended workshops where 2 main changes were outlined: moving from fixed points, to more discretion within stages; and reducing the number of pay points.

1.4.15 The staff associations have consistently argued against discretionary pay as it creates unfairness. We believe there should be the same pay points for all, with progression being determined in the same way for all officers. Due to the 20,000 uplift progress on assessment based pay has been put largely in abeyance. But officers should not be penalised for that. We believe an assumption of competence should be made at all points, (unless the officer is on Unsatisfactory Performance Procedures (UPP)), until such time as acceptable, standardised assessments can be introduced. We also believe that a shortening of the Constables' pay scale would help to retain the early to mid-career officers who will be so crucial to service delivery, by sharing their experience with the 53,000 new recruits. We agree the NRT's earlier suggestion of shortening the pay scale, but not that the timing of movements up the scale should be discretionary.

1.4.16 **Recommendation 9:** It is recommended that the number of points on the Constables' pay scale be reduced from the current 9 points (-1, £18,450 through to 7, £40,128). Later in this document we make a case for points -1 and 0 to be removed. We believe at least 2 other points should be removed, to reduce the scale to 5 points, and enable officers to reach the top faster.

1.4.17 **Recommendation 10:** It is recommended that officers are deemed to be competent unless on UPP, and that progress up the pay scale is only restricted to those not deemed to be competent.

1.4.18 Although the Sergeants' pay scale was not considered as a part of the pay reform, we are aware that the NRT have very recently developed a concern that officers are unwilling to apply for promotion from Constable to Sergeant, due to the small pay differential, and as a result will be recommending the deletion of the lowest pay point. We agree this measure, subject to one

caveat, but we also believe it would be appropriate to introduce a new top pay point for Sergeants.

1.4.19 **Recommendation 11:** We agree the NPCC position of removal of the lowest pay point for Sergeants, so long as all those on that pay point are immediately moved up to the next pay point. We believe this may help with the need to encourage an extra 1,000-2,000 new Sergeants over and above the normal targets. However, we believe it would also be appropriate to add an additional pay point at the top of the pay scale, to ensure that Sergeants continue to be motivated and retained.

1.4.20 Indeed, because officers' pay has fallen so far behind inflation, and there is now an urgent need to encourage officers to stay in service, we believe that all ranks should have a new top pay point. At a time when the numbers of officers must increase to around 116.5% of the current level within 3 years, we believe urgent action is necessary to incentivise retention.

1.4.21 Our underlying argument is that if the numbers of officers are to be returned to 2010, then in order to ensure that recruitment and retention of these numbers can be maintained, it makes sense to return real terms pay to that level too. We therefore suggest that the appropriate new top spine points should be set at the level the top of the scales would have been had these kept pace with CPIH inflation. (Supporting analysis is provided in the submission).

1.4.22 **Recommendation 12:** New tops of the scale should be set for every rank, to encourage retention. We argue that if officer numbers are to be returned to the level they were at in 2010, then to support commensurate recruitment and retention to that which existed in 2010, pay should also be returned to that level. We therefore recommend that the top of each scale should be equivalent to what it would have been had pay kept up with CPIH inflation since 2010.

- 1.4.23 The remit letter seeks views on the impact of pay reform. Two aspects are critical: the assessment of benefits and outcomes; the Equality Impact Assessment (EIA).
- 1.4.24 We were pleased that last year the PRRB noted its concern that the rationale for change was not well articulated in the pay reform programme, and nor had the benefits been stated. We have raised similar points each year, and sought a benefits realisation plan. Again, this year, we set out our concerns, and the risks. There has, however, been no benefits realisation model produced.
- 1.4.25 **Recommendation 13:** We recommend – as we have done for six years now – that a benefits realisation model for the pay reform is produced, outlining the intended benefits, the rationale as to why the NPCC believe that the actions taken will result in these benefits being achieved, and consideration of unintended consequences.
- 1.4.26 We have lobbied throughout the pay reform process for an EIA, and this is a matter of public record, being contained in all our submissions to the PRRB and in Police Consultative Reform (PCF) minutes. We believe the NPCC has a statutory duty, through the Public Sector Equality Duty (PSED), to conduct an EIA when setting out the policy intent. This would be in keeping with the Brown principles. We have sought for the EIA to be done at the appropriate time and in the appropriate manner. We have provided comments on a number of occasions, but these have not been addressed. Having received a new version of the EIA in January, we have written outlining our concerns with both the process now being suggested for EIAs (that these be delegated to forces), and the content. We take the rights of members seriously, and prefer to collaborate with the NPCC to get the best outcome. But the risk that, at this stage, it will not be possible to address the PSED, has caused the staff associations to withdraw from attending EIA workshops organised by the NPCC, as we believe it creates a conflict of interest. We must be able to take whatever action is necessary to make sure our concerns regarding these equality matters are heard.

1.4.27 **Recommendation 14:** Given the PRRB's statement in its Fifth report stressing the legal requirement for an EIA, and the PRRB's request to be notified of any update regarding the EIAs¹ we would ask that the PRRB join us in seeking for the NPCC's EIA to be assessed by an independent suitably qualified professional. We would like an open and transparent process whereby we are sighted on both the legal advice the NPCC have on this matter, and on advice from their equalities' advisor.

1.4.28 We are aware that the NPCC are requested to provide a timetable for regulatory change associated with the pay reforms. At the time of writing, last year's pay uplift, announced in July 2019, and which took effect in September, has not been incorporated in regulations, nor consulted on. This is a simple matter of changing the figures by 2.5%. Furthermore, there is a substantial backlog of other changes to regulations and determinations, including a failure to make regulations consistent with broader UK law by incorporating changes relating to the Children and Families Act of 2014.

1.4.29 **Recommendation 15:** We recommend that the PRRB seek for the Home Secretary to urgently review what is going wrong with the Home Office drafting process.

1.5 Summary of matters in the remit letter focus beyond pay reform: the uplift

1.5.1 The pay uplift is a matter of great importance to a workforce in which – by our calculations – at least 61% receive no incremental uplift, and the “cost of living” uplift is the only one received. As in previous years, we compare officers' pay to its real terms value in 2009-2010. This has particular resonance this year, as the officer numbers are going to be returned to their 2010 level. We argue that pay should also be returned to the 2010 real level of pay, so that officers' purchasing power is the same as it was then. Officers' pay rises have consistently failed to keep pace with the economy's prices of

¹ PRRB Fifth report, 2019 Para 3.110 “We note the legal requirement to undertake Equality Impact Assessments, and the relevance of such assessments to the workforce and pay reform work. We ask that the parties keep us updated on the outcome of these assessments”.

goods and services, due to austerity. Nominal pay has risen, but there has been an overall shortfall of 8.7% against CPIH; 10.3% against CPI; and 18.6% against RPI. Meanwhile when we compare directly to pay settlements in the whole economy, officer pay has fallen 9.8% behind these.

- 1.5.2 And for new starters the situation is worse still. Whereas in 2009 the bottom of the Constable pay scale was £22,680, by 2018 it had dropped to £18,000 for Police Constable Degree Apprentices (PCDAs). This is a real terms drop of 34% in 2018 and 35% in 2019, when the salary remained at £18,000 until September. We believe that is not sustainable, and will result in the service being unable to meet its recruitment targets, if not addressed immediately. Further, we believe that this will have a significant impact on the service's ability to appeal to older applicants with the life experiences that are essential to delivering policing in a compassionate and empathetic manner. It is also highly likely to discourage applications from those with caring responsibilities, and thereby prevents policing being fully representative of the public served.
- 1.5.3 **Recommendation 16:** We therefore believe that the minimum starting salary must be set as pay point 1, (£24,177).
- 1.5.4 As well as assessing the real terms drop in officer pay, we analysed the figures provided in the Police Funding settlement, on 22nd January. The settlement represents a real terms increase on last year of 6.4% overall. This varies by force, from 5.4% in Surrey, to 8.3% in the City of London. We understand that the NPCC intend to suggest an uplift of 2.5% for officers this year. The rationale given is that this is what forces say they can afford. However, this recommendation was determined before the funding settlement was announced. We believe the NPCC position must therefore be revised.
- 1.5.5 To establish our recommendation, we subtracted the ringfenced grant for the 20,000 uplift (taking a proportionate amount from each force's budget) and used the existing numbers of officers to calculate the pay bill. That is, we isolated the effects of the 20,000 uplift. We found that a 5% uplift would be affordable by all forces. We appreciate that forces will argue that funding is needed elsewhere than on the pay bill: but policing depends on its people,

and we believe the greatest improvements will come from having officers who know they are valued, and are well motivated. We believe that is where funding should be prioritised.

- 1.5.6 **Recommendation 17:** we recommend an uplift that will start to narrow the gap between the real terms earning of 2010, and today. Taking into account affordability, we seek an across the board uplift of 5%.
- 1.5.7 The London and South East Allowances were introduced in 2001. These were at least in part intended as compensation for the Housing Allowances, phased out from 1994. These have not been uplifted in any meaningful way since. Although the PRRB sought for the maximum of the SE Allowance to be increased from £2,000 to £3,000, it is discretionary, and the analysis we present demonstrates that it rarely paid at that level. At the same time, house prices in London and the South East have risen by a factor that is significantly above inflation. Since 2006 prices in London have more than doubled, and Office for National Statistics data show that house prices in London 10 years ago were 53% of those in late 2019, while those in the South East in 2009 were 60% of those in 2019.
- 1.5.8 **Recommendation 18:** As in previous years we suggest that London and SE Allowances need to be properly considered by the NPCC and Home Office, with a policy paper outlining the issues, and a coherent solution as to how the employers intend to address these.
- 1.5.9 **Recommendation 19:** In the meantime, we believe that officers in London and the South East should have these allowances uprated by a figure that recognises that house prices in these areas have increased to around 150% of their value 10 years ago. We therefore feel that as a minimum, the London Weighting should be uplifted in line with the pay award, and both London and SE Allowances should be increased to be 150% of their current values. That is, London Allowance should be £6,507; and SE Allowance should have a new maximum of £4,500. The current upper value of the South East Allowance (£3,000) must be non discretionary. We believe these figures

would still be well within the boundaries that a full and proper review is likely to recommend.

1.5.10 Dog Handler's allowance compensates officers for caring for police dogs on rest days and public holidays. In July 2000 a Police Arbitration Tribunal (PAT) award recommended that a single allowance of £1,554 be paid to dog handlers in all ranks, and that an additional 25% of the allowance should be paid in respect of each additional police dog cared for by an officer.

1.5.11 A Home Office circular at the time set out that: "this allowance will be updated annually with effect from 1 September 2000 in accordance with the current uprating mechanism, i.e., in line with increases in basic pay". The allowance has been uprated in line with the annual pay award ever since. We believe it is important to maintain this link to ensure the value of the allowance is not eroded.

1.5.12 We agree with the comments of the PRRB in last year's report that "those proposing alternative approaches should set out the arguments and evidence to support their position".

1.5.13 **Recommendation 19:** Dog Handler's Allowance should be uprated in line with the overall uplift.

2 Chapter 2 Context

2.1 Current officer numbers and 20,000 uplift

- 2.1.1 For the last 10 years, police numbers have been reducing, from 143,765 in 2010 to 122,405 officers as at March 2018: representing a 15% reduction. (There has been a slight increase to 123,171 in March 2019). The impacts of these reduced numbers have been documented in our previous submissions, and for that reason we will not repeat the detail in the main body here. (Our Demand, Capacity, and Welfare report is attached as Annex A). Suffice to say that the pressures on existing officers of overstretch, increasing crime, increased attacks on officers, and changing conditions such as single crewing, continue to make the job more and more difficult. This is true for both the federated ranks, and those at Superintending level, who must provide operational management.
- 2.1.2 Operation Uplift was announced in summer 2019. This is a significant reversal of policy, whereby the aim is to recruit an extra 20,000 officers – over and above the recruitment needed to maintain current numbers – and return the overall numbers to around the 2010 level.
- 2.1.3 The College of Policing lead on this work has calculated that this will mean recruitment of 53,000 officers in total over the coming three years. In fact, by March 2023 it is possible that around 37% of police officers will have been in post for less than 3 years. By contrast, presently across all forces those who joined within the last 3 years comprise just over 17% of the workforce. There are, however, areas where the proportion of probationers is much higher than this: in several boroughs of the Metropolitan Police Service (MPS) there are Basic Command Units (BCUs) with over 30% of officers on probation, with the worst borough having 35% of officers being probationers.²

² Data in the Metropolitan Police Service's Workforce data Report, October 2019. (Data are obtained from the MPS corporate HR database – PSOP).

2.1.4 In some forces the proportion of officers who are new in service will be even higher, as shown in the case study below, West Midlands.

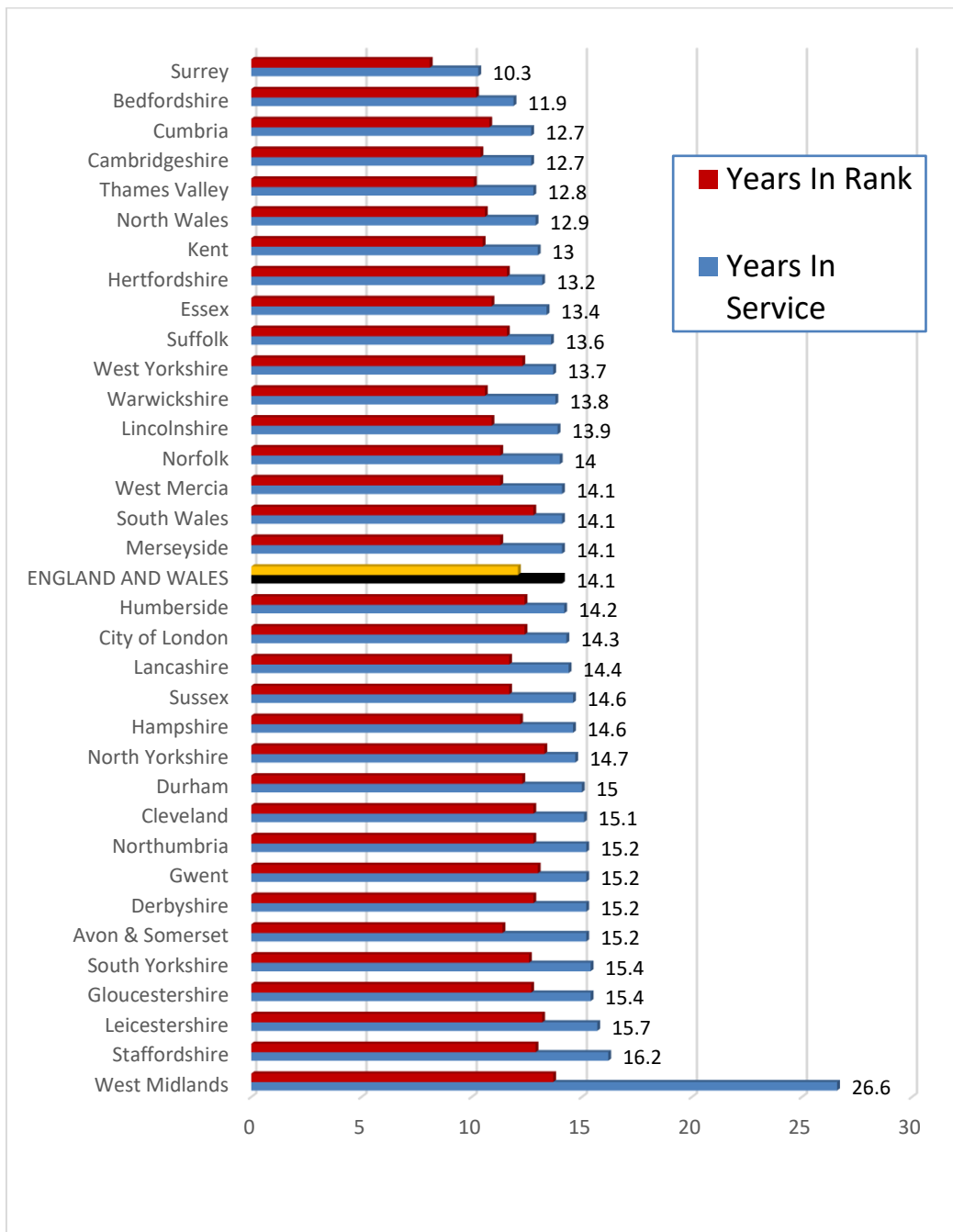
Case study – West Midlands

In a College of Policing meeting on 14th January the Chair of the Fast Track Direct Entry Professional Reference Group stated that West Midlands will lose 5,000 officers due to retirements and attrition in the next 3 years, from a force of just over 6,000. This is due to the fact that for several years now there has been no recruiting, and the age and experience profile for forces has been worryingly drifting towards a situation where an enormous experience gap is inevitable. Therefore if sufficient numbers are recruited to simply replace those retiring or leaving, then in 3 years' time in West Midlands 80% of officers will have under 3 years' service.³ This means the Constable pool will be squeezed upwards to fill posts left vacant by Sergeants and Inspectors retiring, and there will be very few experienced Constables left to tutor the new intake, or indeed patrol with them. If, on top of this, pay for Constables is discretionary, with Variable pay being left to each force to decide, we can surely expect a bidding war between forces that will result in severe disruption to service to the public.

The Pay Census data we were supplied by the Home Office for 2017-2018 was used to try to verify this information. The graph on the following page shows that – using data provided by the force itself – in West Midlands in that period the average length of service for officers is nearly 27 years, meaning that a significant proportion of officers will retire in the next few years. (Note that by the 2018-2019 census this had reduced to 15 years, suggesting there may have been significant turnover already).

³ Chair Fast Track Direct Entry Professional Reference Group, West Midlands Chief Officer, 14th January, 2019.

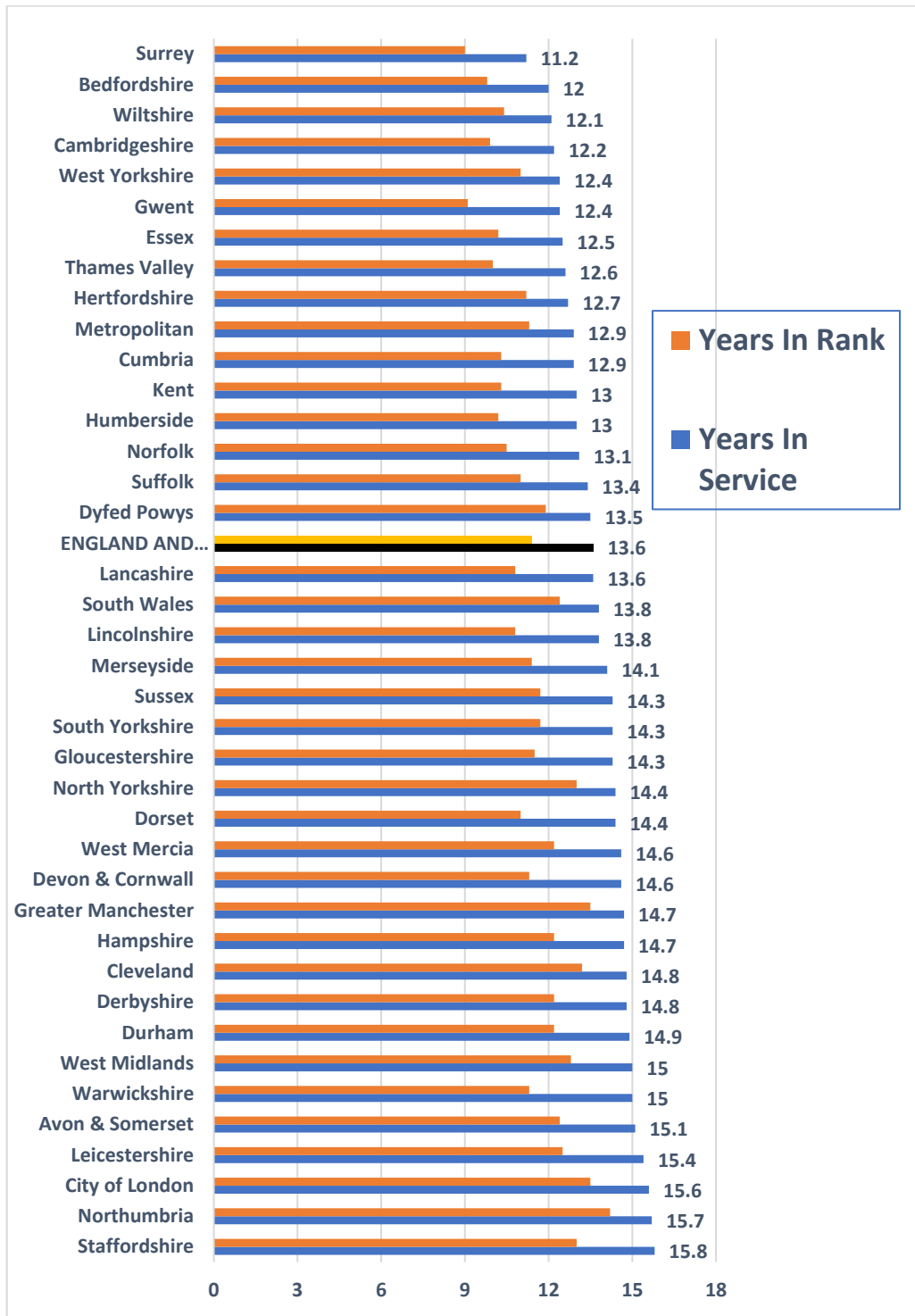
Figure 1: Years in Service and Rank by Force 2017-2018 ^{4 5}



⁴ Police Workforce Pay and Allowances 2017-18, England and Wales; PFEW Report No. R098/2019; R Ferrer.

⁵ Note that several forces did not include length of service data, so not all forces are included.

Figure 2: Years in Service and Years in Rank by Force 2018-2019⁶



⁶ Police Workforce Pay and Allowances 2018-20, England and Wales; PFEW Report No. R004/2020; R Ferrer.

2.1.5 Additionally, the management numbers will have to change. Estimates of the number of new Sergeants needed vary from 1,000 to 2,000; and estimates regarding other ranks include the need for 300 additional Inspectors, and 200 additional Chief Inspectors, Superintending ranks, and above.

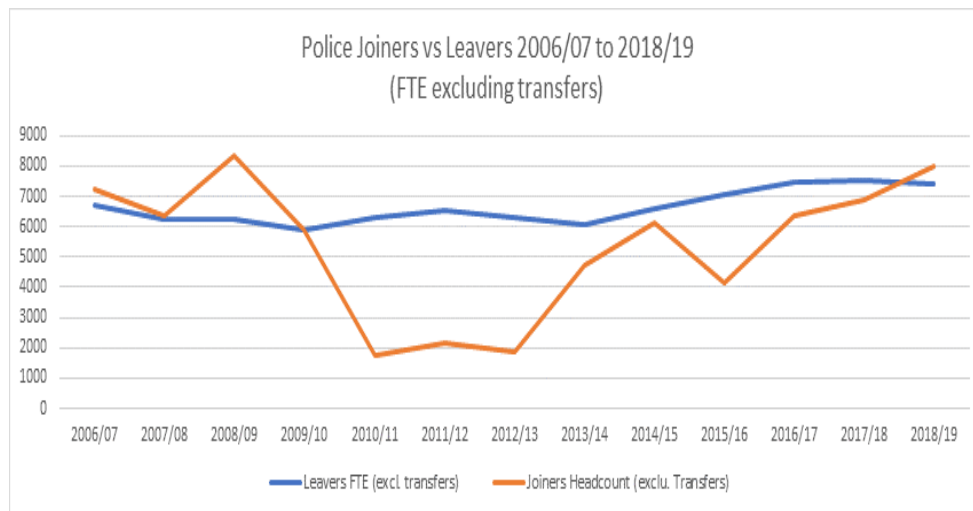
2.1.6 While the staff associations obviously welcome this uplift, the practical challenges of achieving it and maintaining service to the public must not be overlooked, and will need to be managed.

20,000 Uplift: recruitment challenge

2.1.7 The recruitment and retention figures for the last 15 years are below. This gives some sense of the change now required, as in the last 5 years an average 6,303 officers were recruited each year, whereas in the next 3 years to achieve 53,000 17,667 will be needed each year. (Note that the latest figures from Government⁷ suggest that this may be staggered, with an additional 6,000 officers – over and above the numbers needed to maintain the status quo – by March 2021, and the rest by March 2023. However in our calculations we have assumed an even spread).

⁷ <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Lords/2020-01-22/HLWS47/>

Figure 3: Joiners and Leavers over the last 15 years.⁸



2.1.8 There needs to be careful consideration of what level of remuneration will be required in order to attract such significant numbers of good calibre Constables. There is widespread agreement that the current offer is inadequate. At the PFEW Centenary event on 21st November 2019, when asked whether a starting salary of around £18,000 would affect the ability to recruit the 20,000 new officers needed, Chair of the National Police Chiefs’ Council Martin Hewitt replied: “£18k is not a realistic level to expect to be able to attract the right people”.

2.1.9 The Office for National Statistics projections for the England and Wales population⁹ suggest that in 2020 there will be around 8,968,000 people between the ages of 18-30 years: that is, approximately within the usual recruiting age band for officers. That means around one in every 170 people in that age band in England and Wales will need to be recruited, to fill the 53,000 vacancies.

⁸ Data came from the [Police workforce, England and Wales, 31 March 2019: joiners data tables](#) and the [Police workforce, England and Wales, 31 March 2019: leavers data tables](#) which were both updated last on the 18 July 2019.

⁹

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/tablea23principalprojectionenglandandwalespopulationinagegroups>

2.1.10 Notably this calculation of recruit pool size is based on an assumption that all those between the ages of 18-30 will be equally likely to apply. But it is becoming more and more widely acknowledged that a starting salary of £18,450 will not attract those at the upper age band of this recruit pool. The PFEW has long warned that those in their mid to late 20s, who may already have responsibilities such as mortgages and children will not be able to afford to work for £18,450.

2.1.11 Add to this the fact that in the last few years the requirement for all officers to have a degree, or be willing to study for one while fully conducting the duties of the Office of Constable, and it is clear that policing is facing a recruiting challenge the like of which it has never before seen. Of the 3 main routes into policing (Police Constable Degree Apprenticeships, policing degrees, and other degrees with conversion) policing degrees are not fully up and running, and will take until around 2024 to start bearing qualified officers, and the PCDA route is in its infancy.

2.1.12 Since 2017 the PFEW has run a flagship Through Career Research project, with a series of surveys to officers at the start and end of service, and certain key points in between. The aim is to uncover officers' expectations at the start, and track whether these are met by the organisation. These include new starters' surveys, and post probation surveys. The data are revealing.

2.1.13 Our research surveying new starters demonstrates that it is already the case that new officers often are worse off than before joining. We asked all new starters "Compared to before you became a police officer, are you financially...?" "Worse off", "about the same", or "better off". 55% said they were worse off, and 17% about the same. Only 28% were better off.¹⁰ Through the probation period, officers became more likely to say salary was a

¹⁰ Data from the PFEW New Starters survey, 2017 – present. First report New Starters Survey Report 2017; R002-2017 F. Boag-Munroe.

career priority (17% at start, and 45%% at the end.)¹¹ By the end of their probation period, 48% said they were still worse off than before they joined the police.¹² At the end of probation, 33% of respondents said that the job was not meeting the expectations they had before they started, and 44% said that the police service was not meeting its obligations to them.¹³ At the end of probation, 43% said they were undertaking tasks over and above what they were trained to do either every shift, or almost every shift.¹⁴

2.1.14 Furthermore, in order to get to a point where the right recruits can be found, the numbers of applicants needed will be huge. Given that currently, according to the College of Policing, there are 10 applicants to each recruited officer, that means 530,000 applicants are needed: that is one person in every 17 in the population aged 18-30.

2.1.15 The College has already started to consider whether that is realistic. But worryingly their focus to date has been on reducing the need to have 10 applicants to every role, by easing the selection requirements. This is of concern. The College's hope is that they will be able to get the ratio of successful candidates down from 10:1 to 4:1. Even then, 212,000 applicants will be needed. But it is difficult to believe that this dramatic a change in the proportion of applicants judged to be successful can be achieved without some lowering of standards. To be clear, simply deciding to accept a higher proportion of the recruit pool does not mean the right candidates have been recruited, and targets met.

2.1.16 The Home Office confirmed at the Policing Education Qualifications Framework (PEQF) Board meeting on 2 October that all plans regarding the uplift were based around new entrants participating in the PEQF entry and

¹¹ Post-Probation Survey - Tracking changes in job and career expectations in during the first two years of service; R006/2020; F. Boag-Munroe.

¹² Post-Probation Survey - Headline Statistics 2020; R005/2020 F. Boag-Munroe.

¹³ Post-Probation Survey – Whose expectations are being met?; R007/2020 F. Boag-Munroe.

¹⁴ Post-Probation Survey – Whose expectations are being met?; R007/2020, F. Boag-Munroe.

induction arrangements. This influx will have an impact on both the new entrants and the existing workforce, such as mentoring, tutoring, supervision and recruit absences due to 20% Protected Learning Time and the longer 3 year probation period.

- 2.1.17 First line managers – Sergeants – will need to be given the time, skills, and resources to deal with the introduction of PEQF and such numbers of recruits. Systematic work is urgently needed to consider what span of control sergeants can realistically be expected to deal with. Sergeants' own experiences and motivations will need to be considered, and it seems likely that remuneration will need to be considered as a necessary motivator.
- 2.1.18 It is not clear if there will be additional pay or allowances for those officers undertaking the tasks necessary to support this uplift, such as mentoring or acting as tutor constables (also see below), but these commitments are likely to grow with the combination of Uplift 20,000 and PEQF. We know, for example, that a small number of forces use the existing Targeted Bonus Payments for those undertaking tutoring, and we discuss this under Variable pay.
- 2.1.19 The collection of appropriate data to understand and monitor the recruitment process (including checking the numbers of information seekers who are and are not appropriately qualified, and able to be taken through the recruitment process; monitoring the numbers invited to and declining assessment; and evaluating the successful proportions, including by gender and black and ethnic minority (BME) status) will be absolutely critical to ensure that public value for money is achieved. Yet forces still do not collect these data.
- 2.1.20 We made a Freedom of Information request to forces in November 2019. We sought to find out how many new Constables would be recruited in the coming year; how many had been recruited in the past year (and whether vacancies had been filled); and what the median starting salary was. A short note on findings is at Annex B.

2.1.21 However, the key findings are:

- 34 forces responded and stated that between them they had plans to recruit 10,619 new Constables next year. If we extrapolate from that to all 43 forces, and weight the findings to reflect that the MPS (by far the biggest force) has already told us their target, we calculate that forces are planning to recruit around 12,500 next year. This would represent both the initial uplift target of 6,000 set for the period up to March 2021, and the recruitment needed to maintain the status quo.
- Forces appeared not to have had a fixed number of vacancies, and simply reflected the number of recruits they had achieved. For example, Lincolnshire explicitly stated that this was how they operate, and most other forces seem to do likewise. Gwent recruited 63% of their target, and City of London 42%.
- 14 of the 34 forces had some entrants joining in the PCDA scheme. This ranged from 10% of entrants, in Derbyshire, to 87% in Kent. 5 of the forces paid a median starting salary of either £18,000 or £18,450 (both having been possible in year) to PCDA new entrants, while another 5 paid a median of between £18,450 and £21,000.
- 5 forces had Constables entering via the Degree Holder Entry Programme (DHEP). 3 of these 5 forces paid degree holders £20,370 on entry.

2.1.22 Notably separate data obtained from the Metropolitan Police Service¹⁵ shows that during October 2019 the MPS increased by 236 officers, against a prediction of 250-300. This demonstrates that there may be difficulty in attracting the numbers now required.

¹⁵ Metropolitan Police Service Workforce Data Report, October 2019.

20,000 uplift: retention challenge

2.1.23 Clearly in this unprecedented situation, it will also be necessary to ensure that as many officers are retained as possible. The service cannot afford to lose the kind of skills that are needed in order to maintain service to the public while bringing on board so many new officers. And it is the officers currently in the lowest ranks who will be most crucial to success here. Without wishing to derogate the essential work done by Chief Officers, the truth is that it will make little difference to new recruits if Chief Officer retention is not improved, for they are in little contact with them. But it will make enormous day-to-day difference if the 53,000 new officers – mostly Constables – do not have ready access to the up-to-date experience and skills of others who have learnt to face similar challenges to those that they will now have to deal with. They will need to have available to them the insight and counsel of experienced Constables and Sergeants, and the Inspecting and Superintending ranks who provide the vital operational leadership.

2.1.24 Home Office data show that in 2018/2019 8,726 officers left the service. Many of these were retirees. Since 2014/15, the number of voluntary resignations below retirement age has been increasing, from 1,785 in 2014/15 to 2,175 in 2018/19, an increase of 22%.¹⁶

2.1.25 The PFEW surveys all leavers. 34% of respondents say that they would consider returning to the police service in future. Respondents with 26 years or more in service were most likely to say that they would consider returning to the police service in future (37%) compared to only 27% of respondents with between 21- and 25-years' service and 24% of respondents with 11-20 years' service. That is, only about one quarter of those arguably best placed to support new colleagues would currently even consider returning.

¹⁶ The number of females voluntarily leaving is out of kilter with the proportion of females in service. In 2018/19 nearly 53% of voluntary leavers were female, despite making up only 30% of the service. In 2017/18 women were 59% of leavers, and the year before 61%. In those years they were around 28% of the service.

2.1.26 When asked what changes would definitely make them reconsider their decision to go, the most common answers were better work-life balance; improved pension; improvements in welfare; lower workload; and higher salary. Annex C is our most recent Leavers' report.

2.1.27 It is absolutely essential to the success of this policy change that officers in the lowest ranks are encouraged and incentivised to stay in service for as long as it takes for these changes to be embedded. Our data from the Leavers' survey suggests that improvements to pay and pensions can have a significant impact on the ability to retain.

Recommendation 1: In considering pay, prioritise how the 20,000 uplift can be achieved

2.1.28 **Recommendation 1:** Our first recommendation to the PRRB is therefore that it must focus on how pay can support the recruitment of so many new officers, and the retention of those in lower ranks whose skillsets are key to success. This must be the top priority in this year's review, regardless of any ongoing need to reform pay.

NPCC National Reward Team response to 20,000 Uplift

2.1.29 We know that the NPCC have said that Operation Uplift is affecting the pay proposals in respect of:

- Potential changes to pensions arrangements to support retention plans.
- Consideration of whether there should be a change to the £4,000 cap on additional payments for hard-to-fill roles and, if so, whether this should be a short or long-term change.

2.1.30 We agree these are likely to be of some help.

2.1.31 However, we do not believe these to be enough. The starting salary, and early progression pay, are key. Without addressing these we believe there is no hope that the recruitment targets will be achieved.

2.1.32 The starting salary has degraded significantly over the last few years. In 2009 a probationer officer – usually without a degree - started on £22,680. By 2018

that was £18,000. Given that taking into account CPIH inflation the 2009 starting salary is equivalent to £27,843 today, this represents a decrease of £9,843, or 35% of its purchasing power.

2.1.33 It is hard to believe that this salary attracts the same calibre of officers: nor can it be fair to those who serve the public in dangerous and difficult conditions.

2.1.34 The current starting salary (since September 2019) is £18,450. If we assume that officers work 40 hours a week – a very conservative estimate – then that is £8.87 per hour. $(£18,450 / 52) / 40$ From April 2020 the National Living Wage will be £8.72 for workers over 25. That means new police officers will be paid just 15 pence per hour above the National Living Wage. And when you consider that these officers will undoubtedly be studying for the requisite policing degree in addition, then it becomes clear that they are actually earning well below.

2.1.35 We interviewed a number of Police Constable Degree Apprentices (PCDAs) in their first year of service. It was clear that many were struggling with the hours required.

Officer 1 Quote “Since finishing the initial bit...I don’t even care that I’m practically just sleeping around work, the fact I have time to sleep is absolute bliss”.

Officer 2 Quote “I don’t get any time while I’m on shift to do (university assignments)...if we were to do the recommended 24 hours’ study per week, on 4 rest days, well your first day you lose, that means you’ve got 3 rest days left...that means you’ve gotta do 8 hours study a day”.

2.1.36 Further, most PCDAs interviewed had been told not to record their overtime for the apprenticeship documentation.

2.1.37 In addition to the problems with the number of hours’ work required for low salary, the interviews also revealed that many PCDAs did not know what pay

progression would be like. This caused anxiety. It reveals a clear need to ensure that there is more certainty over pay progression in the early years.

Officer 3 Quote: "We are coming up to the end of our first year and we still don't know how the pay scales work or what the pay points are for PCDA...we've raised it numerous times with HR and there's still not been a response".

Officer 4 Quote: "particularly for myself and others that are around my age group, where we've got kids and houses and bills to pay, it's quite stressful and worrying".

Effects on other initiatives

- 2.1.38 This increase in numbers represents such a radical shift in policy that it has already had significant knock on effects on other initiatives that were planned, including changes to recruitment, mentoring and developing Constables, and assessment. Since pay reform was predicated on these initiatives, there has inevitably been a significant impact on current plans for reform.
- 2.1.39 In several cases the programmes were already delayed due to feedback from early piloting, which the College must quite rightly take into account. (For example, the Established Constable Review). But in several cases it is difficult to avoid the conclusion that a failure to be able to progress was inevitable, due to both a failure to take into account known system weaknesses, and a lack of co-ordinated effort across bodies. As an example, the lack of a consistent and robust PDR process has been known for some time, and has been mentioned in every staff association submission to the PRRB: and yet only at the Professional Development and Progression Board meeting in October 2019 was it announced that Police Transformation funding was to be given to the College of Policing to undertake a review. This seems far too late.
- 2.1.40 Moreover, the PRRB has rightly recognised that the National Reward Team do not have the infrastructure in place (including ability to influence the College of Policing workstream) that would be necessary to ensure success. This has not changed since last year. We were extremely disappointed that,

having written to the Home Office in August 2019 setting out several of the PRRB's comments on the pay reform, and seeking for the Home Office to reassure us that, as per the PRRB's direction, it would provide oversight of the reform, we did not receive any comment from the Home Office until November 2019: and then only a letter of acknowledgement, with no substantive or detailed assurances. We provide more detail on this point in Chapter 4, and our letter and the Home Office's response are at Annex D.

2.1.41 It is now difficult to see how the pay reform could be continued as planned.

2.1.42 Some examples of the impacts are noted in the table that follows.

Table 1: The relevant initiatives impacted by the 20,000 uplift.

1. Recruitment and selection
<p>Extension of IPLDP and potential impact on police remuneration.</p> <p>As part of the PEQF transitional provisions the College has made arrangements to allow the extension of IPLDP after January 2020. This can either be a short extension of up to 6 months (ie 30 June 2020) or a longer extension for up to 18 months (ie to 30 June 2021).</p> <p>With the uplift programme it seems more forces are applying for the longer extension. As at end of October 2019 21 forces have advised of their use of the short extension, and 7 have applied for the long one.</p> <p>This means that there are likely to be 2 parallel induction programmes and consequent differences in salary provisions for new entrants without degrees for some time to come, depending on whether officers are recruited on the IPLDP or PEQF programme.</p> <p>This may also affect cohorts recruited under the different programmes within, as well as between forces (the College has confirmed that a few forces are intending to recruit using IPLDP and PCDA concurrently).</p>
<p>Day One</p> <p>The College has approved roll-out of the Day One recruitment package, so this is likely to be the primary assessment process for the additional officers recruited under the Uplift programme.</p> <p>Many forces will be unable to implement the 'high tech' version of the package that Metropolitan Police have been piloting for two years, but a 'low-tech'</p>

version has been designed for those forces, and forces can opt for either package. However, the low tech version has not been fully tested for fairness and equity in the same way as the Met Police model has.

There is a question whether the flexible technological versions will introduce quality differences between forces (with the potential for a disproportionate impact on different groups with protected characteristics), rather than national consistency which was one of the original intentions of the scheme. The Day One packages are unlikely to be available to all forces until Summer 2020 at the earliest.

Ad hoc changes to current selection process

Currently the application-appointment ratio is about 10-1. In light of the Uplift project, work is being undertaken to reduce this through: investigating changes to reduce the time between application and appointment (currently 6-8 months), reviewing the vetting policy; changes to the medical assessment process and criteria; investigating ways to reduce 'no-shows' at assessment centres.

PEQF

The Uplift project has resulted in a shift backwards regarding implementation of PEQF within forces.

As at 25 October (the most recent figures we have) 10 forces are not intending to introduce PCDA and 19 forces are not intending to introduce the Degree Holder Entry Programme until 2021. A number of forces are also intending to run PEQF and IPLDP recruitment programmes concurrently.

Starting salaries

The College of Policing's Professional Committee noted at their meeting on 3 September that starting salaries were a disincentive to older potential joiners who might be looking for a change of career when contemplating a move into policing. This may reduce the size of the applicant pool.

This is despite the College of Policing lead stating at the Professional Development Leaders' seminar in September that the uplift 20,000 cost estimates had been based on new entrants commencing at the top end of the starting salary range rather than the minimum £18,450 for a PCDA entrant.

2. Mentoring and development

Advanced Practitioner

In 2018 this initiative was identified as one of the College's 4 main priorities, due to its links to the pay reform process.

After consultation during April to June 2019 the college reported that there were force readiness issues regarding Advanced Practitioner, as well as concerns expressed during consultation regarding equality and fairness issues, particularly surrounding assessment and selection. It is also no longer seen as a priority although there is general support for a lateral development process.

In October 2019 the College has therefore announced that it will not be progressing with these proposals at this point, although forces are free to adopt them on a local basis.

At the same time the NPCC confirmed that pay proposals for lateral progression schemes such as this have been withdrawn.

Tutor constable role

The College is working to develop a national programme, profile and standards for the tutor constable role. Studies show that the quality of student tutoring is a fundamental component of a student's overall success so PFEW support this in principle, but it is not clear if remuneration arrangements will be built into the proposals. The College stated (IPEB meeting on 14 November 2019) that finance was not considered to be a motivator or incentive for the tutor constable role, based on discussions they have had with some existing tutor constables.

3. Assessment

Established Constable Review (ECR)

This initiative was previously known as "Assessing and Recognising Competence", and before that "Higher Skills Assessment". The original College proposal was based on developing the existing ARC arrangements using simple generic criteria based on core rank profiles: as agreed with the staff associations over a period of years. However, at the College ECR working group in November 2018 the NPCC announced that a successful review was likely to lead to an increase in salary of £10,000. Given the significant financial implications, the College revised their approach in January 2019. New plans included a two stage process.

A pilot study was intended, with 6 forces. The testing phase has been completed. The College experienced significant problems convincing forces to participate. Within the forces who participated, a number of officers did not complete the process. For example, out of 94 volunteers from the MPS only 38 actually completed the process. Feedback was that the process was time-consuming and complex to complete. The College felt that the small number of

those completing the process might have been due to the lack of financial incentive to do so. The College conceded that the pilot would not allow them to put forward a firm evidence-based proposal for development of the scheme.

The ECR process was due for introduction in April 2021, i.e. 15 months after the new pay reforms were due to come into effect. The College indicated that the ECR framework will be informed by the pay reform proposals (e.g. whether there will be two, three or four pay points). The College intend to use the PDR (and UPP) processes as a main contributor to the basis for the reviews.

There is significant concern among forces (particularly MPS) about the (officer) resourcing implications of the ECR, especially as this is likely to arise at the time of the greatest workload emanating from introduction of Uplift 20,000.

Professional Development Reviews (PDRs)

For the last few years the NPCC pay reform has been predicated on there being clear assessment points which officers would have to pass in order to progress from probationer to Foundation Constable, and then from Foundation to Established. However, there has never been a system in place to support this. The staff associations have repeatedly warned that a fair and systematic process would need to be in place before moving to a pay system based on productivity or competence. Last year the PRRB recognised this too.

Data which we received through a Freedom of Information request makes it clear that forces are not in a position to introduce pay that differentiates by performance. (See section 4.4).

The latest update is that as of October 2019 the College has received Police Transformation funding to identify high level processes and principles which should guide implementation of a nationally robust PDR system. They hope to complete the first phase of the review by March 2020. However, clearly the timescales will impact on the timescales for any pay reform.

Recommendation 2: Review the pay reform design within the new operating context

2.1.43 Recommendation 2: Our second recommendation must be that the pay reform design should be urgently reviewed within the current operating context. We believe that certain features – such as linking pay to assessments of performance – will need to be carefully assessed for practicality. It seems likely that the NRT will have to delay formal linkage to assessment, at least until after the design and roll-out of national PDRs, and should opt instead for an assumption of competence within the current pay progression system.

2.2 Current context – Officers’ perspectives

Morale and feeling valued: thoughts on impact on new joiners

2.2.1 The staff associations run the only national surveys of officers’ views on pay and morale¹⁷. For example, the Police Federation of England and Wales has run a survey of federated ranks since 2014, meaning that we now have the ability to track many measures – such as morale – over time. Research using the surveys has been published in a number of peer reviewed academic journals and at conferences, which demonstrates the credibility of the information. A list of peer reviewed journal articles and conference presentations is at Annex E.

2.2.2 Between June and August 2019 we received responses from 19,724 officers.

2.2.3 A clear theme continues to be the stress on existing officers.

Officer 1 Quote: “I currently regularly work in excess of 14 hours per day....I’m always tired and lack concentration. It is impossible to effectively perform in my role due to high demand”. (Inspector, 23 years’ service.)

Officer 2 Quote: I can’t afford to live each day. No work-life balance. Each month only get 2 ½ days off....The management have no idea what is going on at ground level. We keep moving senior managers from pillar to post so they don’t really know what goes on...New officers are poorly trained and don’t have any idea when they are on the ground, which increases stress levels on supervisors”. (Sergeant, 20 years’ service.)

2.2.4 Well over half (57%) said their personal morale was low or very low. (87% said force morale was low; and 93% said police service morale overall was low). Worryingly, Constables were most likely to state that their morale was low (60%). Given that this is the group into which 53,000 new officers are supposedly to be recruited, there must surely be concern that the situation will

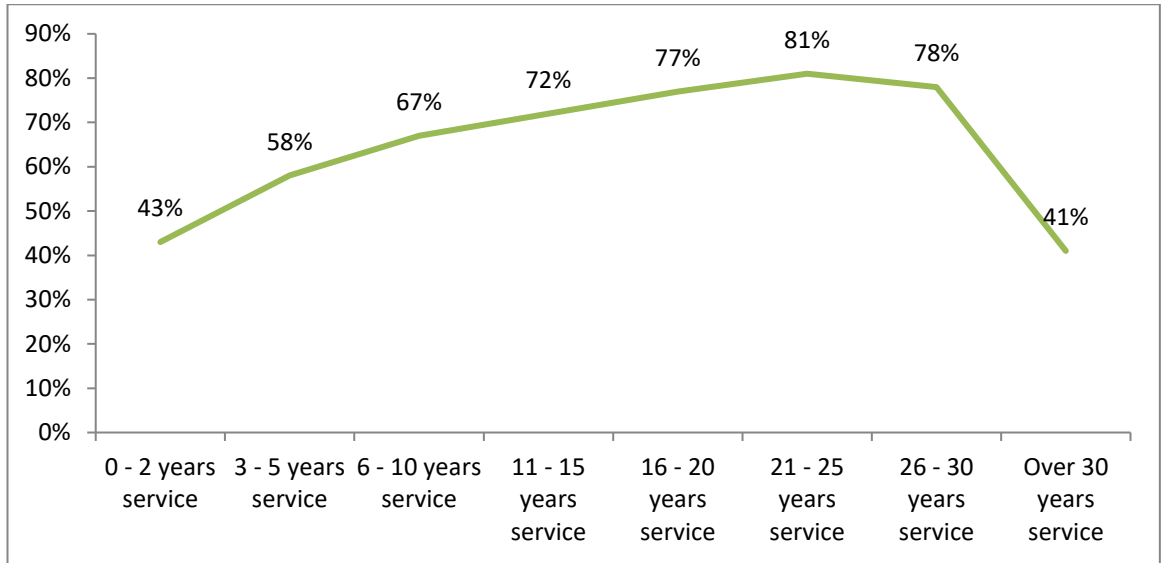
¹⁷ Police Federation of England and Wales Pay and Morale Survey, 2019; R100/2019 by Nicola Chandler.

need to be addressed, as otherwise there is a danger that new starters will also become disillusioned, and leave.

Officer 3 Quote: "The morale is horrendous. I genuinely think my force will struggle to keep its officers". (Constable, Midlands).

- 2.2.5 Mid service officers were most likely to state morale was low.
- 2.2.6 Around two thirds of respondents said they did not feel valued in the police (65%) and 67% said they would not recommend joining, to others. Only 11% of Constables said they felt valued.
- 2.2.7 Overall, a majority of officers felt the service does not deserve their loyalty (54%). Officers with between 11 and 20 years' service were least likely to say the service deserves their loyalty: only 11% of these officers said it does. Given the need to retain as many skilled officers as possible, in order to attain the overall numbers required and to mentor those new to service, the fact that so many officers in this length of service group feel this way is deeply worrying.
- 2.2.8 Many officers stated that staying in service was as much a matter of necessity as of desire. This was worryingly high for experienced officers, whose goodwill will be essential to bringing on board and mentoring the 53,000 new recruits.

Figure 4: Proportion of respondents agreeing that staying in the police was a matter of necessity as much as desire (by length of service)



2.2.9 Over 4 out of 5 federated ranks (81%) said they had not applied for promotion. The most common reasons given for not applying were: that it would not be worth it given the responsibilities and pressures of the job (39%); that they enjoyed their current role (39%); and that it would not be worth it for the salary on offer (36%). To compound the problem, Sergeants were the most likely rank to intend to leave either as soon as possible, or within the next 2 years (13%). Clearly, as there is a need to increase numbers of Sergeants and Inspectors in order to deal with the influx of new Constables, there will be a need to encourage and incentivise promotions as a matter of urgency. The data suggest that pay is currently a disincentive. However, this is one area where the remedy is clear: pay must be increased.

Officers' views on pay

2.2.10 With regard to pay, 79% of respondents to the PFEW survey overall said they were dissatisfied with their pay this year (up from 72% last year). 80% were dissatisfied with overall remuneration (up from 75%). 64% were dissatisfied with their pension.

Table 2: Dissatisfaction with pay by rank.

	Basic pay		Overall remuneration		Pension	
	2019	2018	2019	2018	2019	2018
Constable	81%	73%	81%	76%	63%	63%
Sergeant	78%	71%	81%	76%	69%	63%
Inspector	64%	59%	69%	66%	60%	52%
Chief Inspector	67%	65%	71%	71%	59%	43%

2.2.11 Constables were more likely to be dissatisfied with their pay than any other rank (81%); and those with 3-5 years' service were most dissatisfied with basic pay (89%). Again, given the very high recruitment targets, there is clearly a need to address pay at the very lowest levels of the pay scales, where there is most dissatisfaction, and yet where new Constables will be placed.

2.2.12 For every rank, and on every measure (basic pay, overall remuneration, and pensions) the level of dissatisfaction had increased since last year's survey (with two exceptions, where it remained the same).

2.2.13 81% of officers said that pay and benefits had a negative effect on morale.

2.2.14 74% of respondents said they felt worse off than 5 years ago. Respondents in London were most likely to report feeling worse off (81%). Those with between 3-5 years' service were most likely to say they could never or almost never afford essentials (20%).

2.2.15 83% of respondents did not feel that the police service had met its obligation to provide them with fair pay for the responsibilities of the job. (Up from 77% last year).

Officer 4 Quote: "Workload and responsibilities continue to increase yet we are not rewarded. Seeing higher amounts of sickness and people with lots of experience leaving. Those that leave all state it's the best thing they've done and are significantly better off". (Inspector, 22 years' service).

Officer 5 Quote: "I wish I was 22 again and knew how the police service and its terms and conditions would change, as it has. I would, without a

shadow of a doubt, have made a different career choice. I encourage none of my children to join the police service.” (Inspector, 20 years’ service).

2.2.16 80% of respondents did not feel the service had met its obligations to provide fair pay compared to those in other organisations (again up on last year, from 73%).

Officer 6 Quote: “My role is performed by police officers and civilians, the latter of which are paid £8k a year more. This is due to on call and unsocial hours payments. How is this fair?” (Constable, 23 years’ service).

2.2.17 More data from the PFEW Pay and Morale survey is reported later in this document, notably on the uplift section. Although the main topics covered by the survey are pay and morale, it also covers opinions on promotion prospects and career opportunities, satisfaction with training, and attitudes towards new initiatives.

2.2.18 Key issues for the Superintending ranks are reported in a separate survey, which has been drawn on for the PSA’s own submission.¹⁸

¹⁸ Police Superintendents’ Association and Police Superintendents’ Association of Northern Ireland Pay Survey 2019 Headline Findings January 2020, PFEW report R001/2019; Dr F Boag-Munroe

3 Chapter 3 Pay reform

- 3.1.1 In this chapter we consider the basic building blocks of the NPCC National Reward Team's pay reform programme, and outline staff association positions, and the current status.
- 3.1.2 We have been asked to engage in 4 key building blocks of pay reform, these being benchmarking; Variable pay; the P factor; and the Constables' pay scale.
- 3.1.3 It is worth noting that the need to prepare for the 20,000 uplift has meant that resources in the NRT have been deflected, and this has meant that elements of the pay reform have been delayed and, essentially, deprioritised. We understand why this has occurred.
- 3.1.4 However, this does not mean that those elements that need to be attended to sooner can be rushed through without the level of scrutiny needed for a pay reform affecting over 100,000 officers, and impacting on a public pay bill of £6.5 billion. If any element of the reform is to proceed, then there is still a need to get it right.
- 3.1.5 In summary, the urgency for benchmarking and the P factor seems to have been reassessed, with progress slowed. Variable pay seems to be the element the NRT are keenest to achieve quickly, on the assumption that it will have most impact on the recruitment and retention challenge ahead. Changes to the Constables' pay scale also seem to have been given less priority of late.
- 3.1.6 We were asked to participate in a "consultation" on these elements of pay reform, running from 7th October until 2nd December 2019. The PFEW responded to Chief Constable Jukes initially on 8th November, as we were disappointed with the level of detail provided. Specifically, we were concerned that we were asked to consult on a blueprint document, with specific questions being asked of us despite our not having the information needed to respond. This included being asked to "accept the current benchmarking work

for Constables”, which we had not then seen; (See Annex E) We address each of these below.

3.2 Benchmarking

Our position

3.2.1 The staff associations’ position with regard to benchmarking is essentially unchanged from last year. In our submission in January 2019 we said:

“We agree with the NPCC that benchmarking of pay is important.

To date, in discussions and in the pay working group, the NPCC have stated that the UK market median pay seems a good place to aim for, with regard to officers’ pay. It’s not entirely clear why. Nonetheless, that has been the start point.

Even if we accept that the median is a reasonable point to aim for, then there are two crucial decisions that will impact on whether benchmarking is helpful.

a) The selection of a comparator group.

b) The choice of which part of an officer’s pay should be considered for benchmarking purposes”.

3.2.2 Last year we set out a number of comparator groups that we believed would be helpful: these included paramedics, nurses, teachers, and social workers. We hoped to steer the debate towards using appropriate groups, rather than a broad brush comparison of all UK salaries, that is so all encompassing as to be fairly meaningless. We also stressed the need to benchmark against degree level salaries, given that most officers will have a degree on entry, and PCDA’s within 3 years of joining.

The NPCC NRT Benchmarking

3.2.3 In November 2019 the NPCC provided their most recent benchmarking figures. We appreciate that the NRT will provide these in their report, and

rather than repeat these in detail, we offer below our view on the current status of this work.

3.2.4 While the NRT's consultants, Korn Ferry, have benchmarked within job levels, we are disappointed that, again, these level figures relate to the whole population, and that there is an arbitrary focus on the median within the whole population. Within any level there is a range of job sizes, and these are clustered, which means that the levels are in fact very broad. In particular, Korn Ferry acknowledge that in rank sizing there can be some blurring, and there is potential for misallocation. The Constable role, for example, is very broad.

3.2.5 We were given some reassurances by the NRT about the manner in which these data are to be used. Shortly after the meeting we shared these with the NRT, and checked our understanding. The reassurances were:

- Before the meeting we were concerned – having seen the data columns provided – that the NRT considered the work to be at or nearing completion. However, we were reassured that the NRT agree with us that while progress has been made there is in fact some way to go, and there is still the opportunity to refine the comparators and estimates of salary ratios compared to other jobs, and ensure robust benchmark datasets. We noted that to that end, we look forward to being involved in further iterations of the work.
- We understand that Korn Ferry will be conducting more than one benchmarking exercise, insofar as what has been done so far relates to the “main” Korn Ferry database, but a separate exercise is being done to benchmark vis public sector jobs such as nursing and teaching. This is because there is no “no right / definitive” answer when benchmarking.

- Although the Korn Ferry data are currently presented as fairly precise numerical comparisons (e.g. the Constable total remuneration is described as 123% of a comparator) it is acknowledged there is a margin of error around this, and it might be more appropriate to think of this as a broad estimate.
- It was noted that the numerical comparison could be made more accurate over time, say by refining the comparator jobs used (e.g. excluding some in the existing database).
- As an example relating to the point above, the current comparators don't exclude roles where no shiftwork is required. That is, the database includes roles that may be generally 9am-5pm . That means that no account is taken of the need for, or likelihood that, jobs where shifts are done attract a premium. One option might be to look into a comparison dataset that includes only shiftworkers.
- In determining the job sizing of jobs used for comparators within the Korn Ferry, it has been assumed those jobs demand no special training. But it is acknowledged that is not true for Constables or other officers.
- There was some discussion of how the P factor could be separated out, and this may need further discussion.

3.2.6 At the meeting in November we sought, for transparency, a list of some of the comparator jobs that have been used at each rank level, as this is not currently given. We await these data.

3.2.7 We also noted that it would be useful to explore the possibility of an iterative project refining the database to comparators that include certain job features beyond the current Korn Ferry list of 4-5 areas. It would be useful to have a list of exclusion and inclusion criteria, to that end. We would appreciate further discussion of the potential for doing this.

3.2.8 At this point, mindful of the fact that it is agreed by all parties (including the NRT and staff associations) that the benchmarking data is insufficiently mature to be used to set salaries, and that there are other comparisons needed, we urge the PRRB to treat the data provided as broad guidance only.

The staff associations' benchmarking

3.2.9 Given our concerns regarding the inclusion and exclusion criteria for the current benchmarking, we felt it would be appropriate to consider other data, to provide an alternative perspective.

3.2.10 The staff associations have conducted a rapid benchmarking exercise, using the Incomes Data Research (IDR) database Pay Benchmarker. We also drew on data provided in a report that IDR produced for the Prison Services Pay Review Body.¹⁹

3.2.11 To be clear, we are not suggesting that these data are used to set pay at this point. However, we include this as an example of a different benchmarking exercise, whose methodology is at least as defensible as the NRT exercise (and we would argue more so). We trust the findings will give some pause for thought.

3.2.12 The database provides a list of job titles contained in pay levels. Each pay level corresponds to a specific description of skills and responsibilities. In this case, IDR has already classified police officers at different ranks on their corresponding levels.

3.2.13 IDR have used the pay scales as of September 2018, so these data will need to be updated in future. Additionally, IDR have calculated what they term "average" pay as being the average taken across pay points, rather than the actual average received by officers. For example, for level 5 Constables with

¹⁹ Sources: IDR Database at <https://www.incomesdataresearch.co.uk/> and IDR, November 2019, "Prison Staff Pay Comparability, a report for the Office of Manpower Economics" at <https://www.gov.uk/government/publications/prison-pay-comparability-study>

2 to 4 years' service the average was calculated as pay point 2, 3, and 4 added then divided by 3. $(£24,654+£25,728+£26,802)/3$). For level 6 Constables pay points 5 and 6 were averaged.

3.2.14 It is important to note that because of this different way of calculating the average, the averages cited by the NPCC in their benchmarking work differ. The averages we cite from the pay census data differ, for the same reason. We will therefore refer to the IDR data for officers as "midpoint" data, rather than "average", as the IDR calculation yields a figure at or near the midpoint.

3.2.15 The main difference between the exercise we conducted and the NRT work is that we have chosen specific comparators for policing. We have always held in our PRRB submissions that this should be the case. It is crucial that officers' pay is compared to roles that are in some way similar, rather than simply comparing them to all jobs in the UK, and stating that officers ought to be at an arbitrarily defined level by comparison to all. We have never agreed that it is appropriate simply to look at the median in the population and compare officers to that. There is no sound rationale for so doing.

3.2.16 For our benchmarking exercise, we followed three steps:

1. We reviewed the comparison performed by IDR for the Prison Staff Pay Comparability. In that, several police officer ranks were already designated by IDR as good comparators for Prison Service grades and other roles.
2. We looked for these same roles in the IDR database, adding for the comparison with each police officer rank the roles that were considered good comparators by IDR at the appropriate level.
3. We also added other roles that we consider represent a good comparator to the role of police officers, using the IDR database classification of levels. Notably, unlike the NRT benchmarking, these included comparators where shift work is a key requirement of the job.

3.2.17 It is worth noting that while we haven't done the Through Career Remuneration calculations that Korn Ferry have, many of the comparators

that we use are public sector, and have similar pension schemes to the police. This means that blunt salary comparisons are adequate, as Through Career Remuneration calculations within this, more appropriate, comparator group are unlikely to demonstrate differences between the police and other comparators.

3.2.18 We still do not have an explanation from Korn Ferry as to how the Through Career Remuneration calculation has been done. However, it seems likely that the reason that officers' Through Career Remuneration demonstrates a gap in favour of officers (by comparison to base salary comparisons) is that private sector pension schemes are extremely variable, and widely understood to be inadequate in many cases.

3.2.19 Note that for all the roles that follow, we believe the standard working week for officers, which is 40 hours for all ranks, is more than the standard number of hours in the comparator jobs. We have not adjusted the benchmark data for this. Moreover, we have not fully been able to take into account shift work. We believe that the shift work allowance in many services is higher than the Unsocial Hours payment officers receive.

Constables

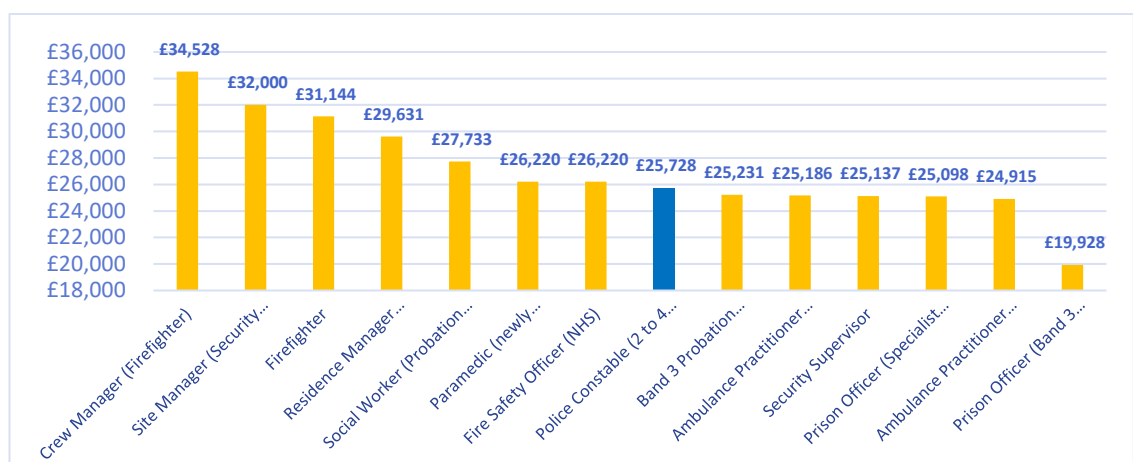
3.2.20 IDR did not include PCDAs, so the range of salary use at the lowest level of Constables is restricted. For that reason, we have only set the role of Constables at two different levels here, these being 2-4 years, and over 4 years:

Level 5: For Constables (2 to 4 years' service). Level 5 is defined by IDR as "Work requires detailed experience and possibly some level of vocational qualification to be able to oversee the operation of an important procedure or to provide specialist advice and services, involving applied knowledge of internal systems and procedures".

Level 6: For Constables (after 4 years' service) and defined by IDR as "Work requires a professional qualification and sufficient relevant specialist experience to be able to manage a section or operate with self-contained expertise in a specialist discipline or activity".

3.2.21 In the IDR database,²⁰ the midpoint salary for a Constable with 2 to 4 years' service is £25,728. This salary is below 7 out of 13 available similar level comparators (NHS Paramedic and Fire Safety Officer, two Firefighter positions, Security Worker at both G4S plc. and the University of Leeds, and Probation Officer at the Northern Ireland Civil Service). This salary exceeds the salary of six comparators (NHS Ambulance Practitioner Specialist plus Ambulance Practitioner Specialist Band 5, Northern Ireland Civil Service Security Supervisor, Prison Officer Band 3 and Band 4, and Probation Officer at the National Probation Service). The highest average salary in this group was £8,800 above the police officers' salary.

Figure 5: Constables 2-4 years' service, and comparable roles.



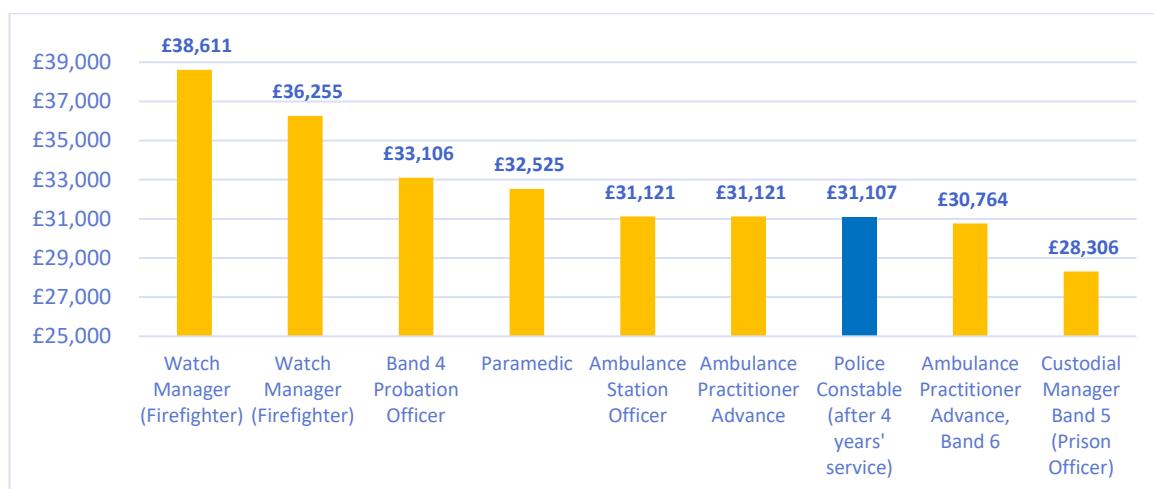
3.2.22 For Constables (after 4 years' service), the database shows a midpoint salary of £31,107. This salary is below the salaries of six out of eight available comparators (two Firefighter positions, Band 4 Probation Officer, NHS Paramedic, NHS Ambulance Station Officer and NHS Ambulance Practitioner Advance). In contrast, their midpoint salary is higher than two comparators (NHS Ambulance Practitioner Advance Band 6, and Custodial Manager Band

²⁰ The IDR database contains 800 pay awards per year and 10,000 salary records covering 200 jobs from 900 firms, which can be interrogated by region, sector and size.

<https://www.incomesdataresearch.co.uk/pay-benchmarker>

5). The highest salary in this group is £7,504 above the Constables' average salary.

Figure 6: Constables (after 4 years' service) and comparable roles



Sergeants

3.2.23 IDR sets the role of Sergeants at level 7: defined by IDR as follows: “Work is concerned with the management of a department and requires an experienced professional able to lead staff, deliver outputs and manage budgets. Some input to functional strategy will be required”.

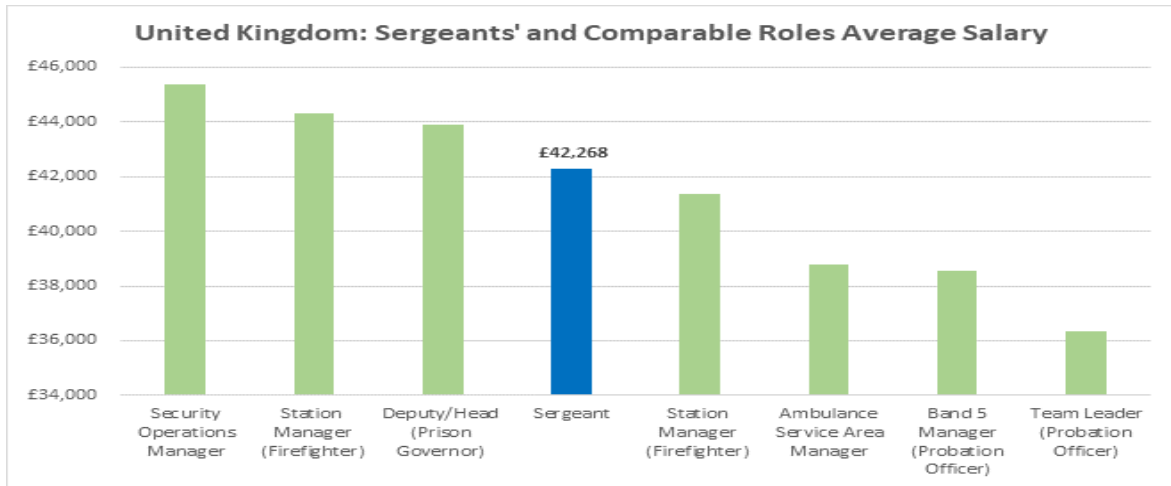
3.2.24 The midpoint salary of Sergeants is £42,268²¹. This salary is lower than three out of seven available comparators (Private Security Operations Manager, one Station Manager Firefighter position, and Deputy/Head Prison). However, the salary of Sergeants is higher than four comparable roles: one other Station Manager Firefighter position, NHS Ambulance Service Area Manager, Band 5 Manager and Team Leader (Probation Officer in both cases).

3.2.25 As noted, police officers, including Sergeants, have a working week of 40 hours per week, which is higher than the working hours per week of five out of seven comparator roles. This has an impact on Sergeants' actual earnings per hour, which would be relatively lower in comparison to other similar roles.

²¹ Please note that unlike for the other officer ranks, we had to calculate the Sergeants' midpoint, as IDR had used data from 2015 for the officers only (not for other roles in the exercise). For consistency we calculated the 2018 figure and used that.

The highest salary in this group is £3,088 above that of Sergeants.

Figure 7: Sergeants and comparable roles.



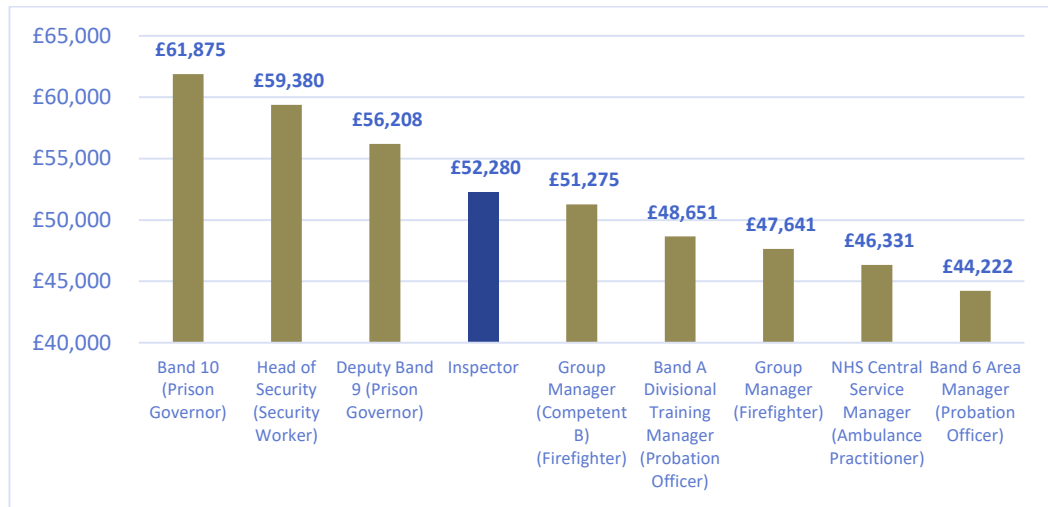
Inspectors

3.2.26 IDR sets the role of Inspectors at level 8. Level 8 is defined by IDR as “Work requires deeper professional experience and qualifications in a specific discipline to be able to carry out a range of specialist technical or scientific activities, which may include the management of a team or services. May also include specialist management roles responsible for delivery of a major service”.

3.2.27 The midpoint salary of Inspectors is £52,280. This salary is lower than three out of eight available comparators (Band 9 and 10 Prison Governor, and Head of Security). On the other hand, the salary of Inspectors is higher than five out of eight comparable roles (Two Group Manager Firefighters, Training Manager Probation Officer, Area Manager Probation Officer, and NHS Central Service Ambulance Manager).

3.2.28 In this case, the highest average salary is £9,595 above that of Inspectors.

Figure 8: Inspectors and comparable roles



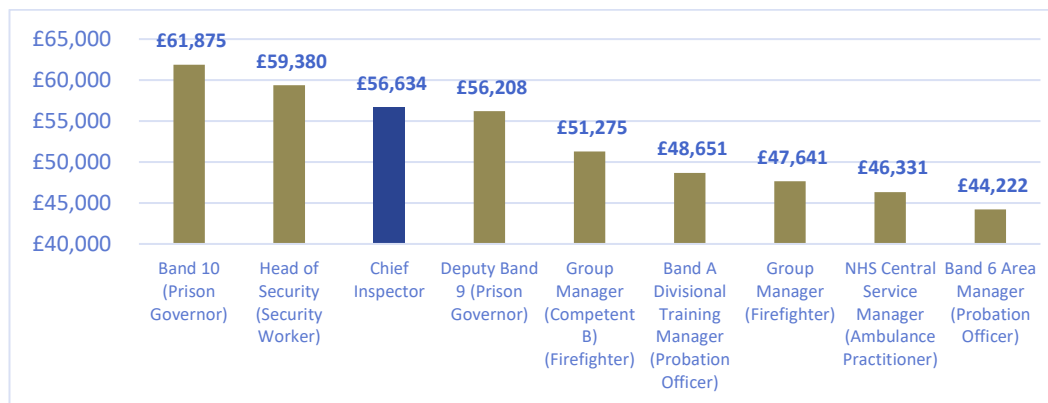
Chief Inspectors

3.2.29 IDR sets the role of Chief Inspectors at the same level of the role of Inspectors.

3.2.30 The midpoint salary of Chief Inspectors calculated by IDR is £56,634. This salary is lower than two out of eight comparable salaries (Band 10 Prison Governor and Head of Security). By contrast, the salary of Chief Inspectors is higher than the salary of six out of eight comparable roles (Deputy Band 9 Prison Governor, Group Manager Firefighter, Group Manager Competent B Firefighter, Band A Training Manager Probation Officer, Band 6 Area Manager Probation Officer, NHS Central Service Ambulance Manager).

3.2.31 The difference between the highest average salary in this group and that of Chief Inspectors is £5,241.

Figure 9: Chief Inspectors and comparable roles



3.2.32 The Superintending ranks have commissioned their own benchmarking study using Korn Ferry, and therefore data are not included here.

3.2.33 In conclusion, our data, using what we believe to be appropriate benchmarks, mostly drawn from the public sector, suggest that Constables lag well behind comparable roles such as firefighter, paramedic, and probation officer. Crucially we believe that these are the very roles against which policing must compete for new recruits, as we believe those drawn to serving the public would find these roles attractive for the same reasons as they do policing.

3.2.34 The data demonstrate that at every rank (with levels matched by IDR) there is a discrepancy between the highest average pay in that category, and that of officers. For Constables at Level 6 the highest average pay is at least £7,504 above; for Sergeants it is just over £3,000 above, and for Inspectors it is £9,595.

3.2.35 The IDR data tell a very different story to the Korn Ferry data supplied by the NPCC, especially with regards to Constables and Inspectors. This is not surprising given the very different methodologies. But it signifies the importance of agreeing an appropriate methodology first, before the benchmarking outcomes can be used in any meaningful way.

Recommendation 3: Work to establish common ground on benchmarking

3.2.36 **Recommendation 3:** with regard to the benchmarking element of the pay reform, our recommendation is that we continue to work closely together to establish common ground as to the underpinning benchmark methodology, and inclusion and exclusion criteria for this. We believe that the current work is not based on adequate inclusion and exclusion criteria for benchmarking. Furthermore, it is taking too long, and we would wish to see it driven faster in the interests of ensuring officers get a fair deal compared to other organisations.

3.3 P factor

Our position

- 3.3.1 In our Fifth submission in early 2019, we stated that the P factor is the element of pay reform where there is most agreement with the NPCC, as we are content with both the content, and the method by which the NPCC have said they will incorporate the P factor into pay for federated ranks.
- 3.3.2 At that point, the PFEW had conducted research into the psychological contract within policing, working with King's College London, and had used that work to feed into the NPCC's P factor definitions, where we identified a small number of gaps. (These included issues such as impact on spouses' employment, which is a part of the military X factor and also applies for officers, whose shift work can mean spouses carry a greater burden of family responsibility, in turn limiting their career choices. Unfortunately this has not been incorporated into the definition, however).
- 3.3.3 We supported the NPCC's stated intention, that the component of pay known as the P factor should be separated out from pay for benchmarking purposes. The balance of pay should be used for market comparison, as this is the part that compensates for the skills and abilities that officers require that may not be unique to the role. Given that officers are already on a certain level of pay, we believe the sequence should be to first determine the size of the P factor; then subtract that from current pay, and compare the value that is left to appropriate comparators.

- 3.3.4 Where we differed from the NPCC was in our view of how big the P factor should be. Last year we proposed 14%, as being a similar value to the military X factor: but in absence of any existing systematic evaluation, we supported the NPCC proposal that the P factor should be evaluated independently.
- 3.3.5 Unfortunately, independent evaluation has not been agreed. In these circumstances we stand ready to assist with the design of underpinning metrics that will allow measurement of the P factor components, and with the evaluation of the scale of the pay element that needs to be associated with these.

Possible metrics

- 3.3.6 The NRT have provided a broad definition of the P factor as containing 4 main categories, with 12 sub-categories.
- 3.3.7 Discussions are still underway as regards the way in which the P factor could be measured and tracked over time. In year, through the Police Consultative Forum, the staff associations suggested some potential metrics that could be used to measure these, with a view to informing the valuation. The staff associations are keen to ensure that the measure used is not restricted to a single global “stress” definition, as that is not our understating of the original intent and design.
- 3.3.8 This is not intended to be an exhaustive list, and there are obvious indicators within the Home Office dataset (e.g. officer numbers; assaults, and so on). However, these are some of the indicators from, for example, our surveys, that could be used alongside these.
- 3.3.9 At this stage the metrics have not been combined to provide an actuarial score; nor have the metrics been tracked over time. However, we recommend that both these are done in order to develop a more robust measure of the P factor year on year.

3.3.10 To derive a robust measure of the P factor, it is suggested that the following steps are taken.

- a) Agree the metrics that address each component.
- b) Agree weightings for these.
- c) Calculate a value for Yr 1.
- d) Agree and assign a monetary value.
- e) Track year on year.
- f) Agree a band around the P factor value, movement beyond which would require adjustment of the valuation. (That is, to avoid yearly fluctuation, which might be problematic, it might be useful to agree that if the P factor changes by more than a certain number of percentage points, it will lead to consideration of revaluation).

Recommendation 4: Systematically review the P factor, following the steps we set out

3.3.11 **Recommendation 4:** It is recommended that over the coming year a systematic approach to the valuation of the P factor is undertaken, perhaps following the steps suggested by the staff associations.

Table 3: Suggested metrics for the P factor

Category – PHYSICAL	
Sub-category	Suggested metric
Uniquely confrontational	From PFEW Exposure to Trauma scale: ²² 44% respondents to a survey of Authorised Taser officers had had to discharge a Taser at least once, to protect themselves, the public, or colleagues; 76% of firearms officers had had to discharge a firearm.
High risk of harm / assault	From PFEW Exposure to Trauma scale:

²² PFEW Demand, Capacity and Welfare Survey 2018: Headline Statistics December 2018; R101/2018; M. Elliott-Davies, M. <https://www.polfed.org/media/14060/demandcapacityandwelfaresurveyheadlinestatics2018-06-02-19-v1.pdf>

	<p>67% survey respondents were the victim of unarmed physical assault; 31% on at least a monthly basis; 50% were subject of a serious physical assault at least once in career; 6556 officers were spat at; 22% had at least one injury requiring medical attention in the last 12 months due to violence; 15% had at least 1 accident that caused them to need medical attention in the last 12 months.</p> <p>In 2018 6.1% of respondents from relevant frontline roles (Neighbourhood, Response, Roads Policing, Operational Support, Investigations, and other) indicated that they are often or always single-crewed; almost three percentage points higher than in the 2016 iteration of this survey.</p>
Category – PSYCHOLOGICAL	
Trauma of exposure to distressing incidents / materials	<p>A policing specific Exposure to Trauma scale was produced for the survey:</p> <p>This showed almost all officers (99.6%) experienced at least one of the events on the scale during their service. 97% had attended to the victim of a serious physical assault; 96% had seen the body of someone who had died a violent or unnatural death; 93% had attended to the victim of a sexual assault; 85% had attended to the victim(s) of a serious road accident. Over 30% had been present at a scene where there had been multiple fatalities; and 22% had attended the scene of a serious act of violence after the threat had ended.</p> <p>Respondents on the Short-Warwick-Edinburgh Mental Wellbeing Scale (SWEMWBS) have worse scores than the general population. 79% of respondents had experienced stress, low mood, or anxiety in the last 12 months, with 94% saying these had been caused or made worse by work.</p>
Level of scrutiny	<p>The IOPC collate numbers of investigations, numbers upheld, etc.</p> <p>https://policeconduct.gov.uk/sites/default/files/Documents/statistics/complaints_statistics_2018_19_v2.pdf</p> <p>E.g. there were 31,097 compliant cases in 2018/2019, which is approx. 1 for every 4 officers. (Some will be about multiple officers). 58,478 allegations were recorded. On average an investigation of these took 158 days. 21,764 were finalised by investigation. Just over 2,000 were categorised as “special”, so might have resulted in criminal proceedings.</p>
Category – LEGAL	
Nonfeasance	<p>From the IPOC:</p> <p>Neglect or failure in duty accounted for 41% of all allegations in 2018/2019</p>

Exposure to risk (non-core police business)	<p>32% of respondents to our survey said at least one of their sick days was attributable to stress, depression, or anxiety.</p> <p>78% said they had come into work while actually sick (thus arguably accepting a higher level of risk to themselves, as they were not actually fit for work).</p>
Accountability and scrutiny	See IPOC report
Membership Trade Unions and political activity	<p>Regulation SCHEDULE 1, Regulation 6 ANNEX AA REFERS RESTRICTIONS ON THE PRIVATE LIFE OF MEMBERS OF POLICE FORCES</p> <p>1. (1) A member of a police force shall at all times abstain from any activity which is likely to interfere with the impartial discharge of his duties or which is likely to give rise to the impression amongst members of the public that it may so interfere. (2) A member of a police force shall in particular -(a) not take any active part in politics;(b) not belong to any organisation specified or described in a determination of the Secretary of State.</p> <p>2. A member of a police force shall not reside at premises which are not for the time being approved by the chief officer.</p> <p>3. (1) A member of a police force shall not, without the previous consent of the chief officer, receive a lodger in a house or quarters with which he is provided by the local policing body or sub-let any part of the house or quarters. (2) A member of a police force shall not, unless he has previously given written notice to the chief officer, receive a lodger in a house in which he resides and in respect of which he receives an allowance under Schedule 3 or sub-let any part of such a house.</p> <p>4. A member of a police force shall not wilfully refuse or neglect to discharge any lawful debt</p>
Category – SOCIAL / ECONOMIC	
Use of social media	
Victimisation based on profession	
Disruption to family life	Demand, Capacity and Welfare report - roles and working arrangements. Shift patterns including nights (48%); 9 hour shifts (30%); median 2.5 hours overtime every week; 31% unable to take all leave to which entitled; 52% never or rarely able to take rest break; 67% 2 or more rest days cancelled in last 12 months.
Associates and business activity	

Valuation

3.3.12 At this point, we still consider the P factor measurement to be a “work in progress”. While there has been some refinement of the measures suggested, this is not yet complete. The NRT were not aware that there would be no independent valuation until the Home Secretary announced the outcome of the pay review process in July, and mobilisation of resource to undertake this work has been in the context of additional challenges such as the 20,000 uplift. We hope that over the coming year systematic evaluation of the P factor can be undertaken, and we are willing to collaborate with the NRT on that: indeed we have started doing so.

3.3.13 Notably the NPCC suggested a figure of 12%, on 21st January 2020, but their argument that “the notional value of the P factor within police officer pay should increase from 8% to 12% of Constables’ base salary” seems to treat Winsor’s original valuation of 8%, which was only for the danger and deployability element of the X factor, as though it was a final agreed valuation for either the whole of the X factor or the P factor. It was not. The arguments given for setting the valuation at 12% are not persuasive.

3.3.14 Last year, we argued that the P factor should be set at a similar value to the military X factor. We asked officers, in our Pay and Morale Survey, “If your P factor was paid on top of basic pay, what amount do you think this payment should be?”. We noted that the military X factor is around 14%. 41% of respondents said they believed the P factor should be that same value. (25% said below that, 34% said above).²³

3.3.15 We appreciate that there are differences: the military go away from home to work for long periods, and face significant danger when away. In many cases the military are effectively peacekeeping or maintaining civil law in conflict zones. We do not seek to undervalue this. But while police officers are not generally away from home overnight for long periods, they increasingly face

²³ PFEW Pay and Morale Survey, data collected August 2019; presentation to National Board, PFEW, F. Boag-Munroe.

danger at home. Unlike the military, for whom danger is confined to specific times and places, usually far from home, police officers face threat from certain sections of the public 24/7, and they cannot escape it, because the threat is within the locality where they both work and live. In addition, this threat can extend to their family in a way that is not generally the case for the military. We do not think that the impact on officers is any less than that on the military, and we do not believe it is appropriate to value the sacrifices of one group of Crown servants differently to that of the other.

3.3.16 At this point, therefore, we see no evidence that we should move away from the position we adopted last year, which was that the P factor should be set at the same rate of the military X factor: currently 14.5%. We do not believe it would be right for a lower value to be adopted, as to do so would in effect unfairly penalise officers for the decision not to progress with the independent valuation this year, which has delayed the overall process.

Recommendation 5: Valuation of the P factor to be 14.5% (as for military)

3.3.17 **Recommendation 5:** Until such time as a systematic evaluation is undertaken, the P factor should be assumed to be 14.5%, in keeping with the military X factor.

3.4 “Variable pay” – proposals for hard-to-fill and uplift

3.4.1 While we acknowledge that it is critical to the recruitment and retention of officers that something must be done to reward officers in roles that are, for whatever reason, hard to fill or challenging, we are concerned that in some ways this aspect of pay reform has seen least systematic progress since last year. In particular, the Equality Impact Analysis has been poor: and yet from earliest discussions of variable pay we have stressed the need to attend to this aspect, to avoid the same equality problems that were inherent in Competence Related Threshold Payments, and in Special Priority Payments.

3.4.2 Last year the NRT were talking of essentially 2 strands of work on variable pay:

- The first was a categorisation of variable pay into 4 groups: role based allowances; outstanding, demanding, or unpleasant piece of work; skill additional to role; and geographical allowance.
- The second strand was targeted bonuses. These were discretionary payments made by Chief Constables. These were introduced as an interim measure, pending further work on variable pay. Introduced in 2018, in their submission in January 2019 the NPCC sought for them to be retained for another year, pending review.

3.4.3 In the last 12 months the discussion of the categorisation of variable pay seems to have largely been deprioritised, while only the targeted bonuses remain on the table. These are now referred to as Targeted Variable Payments (TVPs).

3.4.4 In recent informal discussions the NPCC have suggested that they will monitor which roles attract TVPs in each force, with a view to sharing this with other forces and *potentially* attempting to establish a common framework of which roles attract bonuses, so that these *might* become more consistent over time. This seems rather an ad hoc approach, whereby the framework for pay emerges out of whatever practices forces adopt. Internal market forces will be the driver.

3.4.5 We believe this is a retrograde step, taking us further from any meaningful attempt to introduce any underpinning philosophical or moral rationale (e.g. rewarding the most difficult roles) or methodically assess any recruitment and retention benefits of variable pay. Without such a clear rationale, the risks in terms of introducing unintended consequences – including breaches of employment law – are increased.

Our position

3.4.6 Since the first year of the Police Remuneration Review Body we have set out the view that:

“We believe there is a need to ensure the pay system reflects a number of considerations: it should attract and retain officers who are representative of the public served; it should be designed so as to ensure officers believe there is organisational justice within the system; it should be designed, based on evidence of need, and what works; it should facilitate deployability to a range of roles and requiring a range of skills; it should appropriately recognise the skills, knowledge, and attributes, and workload required”.²⁴

“Responsibilities undertaken, the risk carried, and the size of the role should also be taken into account. Further, “We believe that to achieve such a system, existing anomalies need to be addressed. These include the need for a clear rationale for each element of the remuneration package.”²⁵

“The PFEW believes that the pay system should demonstrate organisational justice. Officers ... should be rewarded appropriately for their skills, knowledge, attributes, hours worked, sacrifices made, responsibilities, span of command, and the risks and demands of the job. We agree with Winsor’s position that these should be properly evaluated, through a systematic job analysis”.²⁶

3.4.7 In February 2019, when the NPCC asked to continue with targeted bonuses for another year, pending a review, we said:

²⁴ P.9 of Submission to the Police Remuneration Review Body, by the PFEW and PSAEW, 9th January 2015.

²⁵ P.23 *ibid.*

²⁶ P.153 *ibid.*

“whilst we welcome the recommendation to continue this bonus payment, for the time being, we are extremely cautious about the NPCC wording of their recommendation, which is “Subject to feedback ...to recommend the extension of the scheme on a permanent basis as a means of recognising additional skills.

In particular, we do not believe the permanent extension of the bonus payment should be merely subject to survey feedback from HR practitioners. Much more rigorous testing is needed, including an assessment of the equality impact. Further, in the longer term we had hoped that if payment were to be linked to skills then more objective criteria would be used and set out. We had never anticipated this bonus payment to be permanently used, and we do not believe that that was the intention of the PRRB in agreeing it”.²⁷

3.4.8 There are a number of risks if variable pay is not addressed systematically.

- There is significant risk that there will be negative impacts in terms of equality, and that those with protected characteristics will find that the roles in which they are currently placed do not attract the TVPs. This will lead to litigation.

In the NPCC’s own survey of forces regarding their pay design,²⁸ of 39 forces responding, when asked “what issues would get in the way of your force using targeted variable pay now or in the future?” 10 forces raised concerns about equality or fairness.

²⁷ Submission to the Police Remuneration and Review Body on behalf of PFEW and PSA 8th February 2019.

²⁸ Blueprint 2.1 Survey, NPCC, December 2019 (draft provided January 2020).

- There is substantial risk that officers will believe this to be an unfair process, rewarding those who Chiefs single out, rather than those most deserving. Without a transparent rationale capturing all roles (that is, why roles are rewarded, and some are not), there may be criticisms of favouritism. Pay systems that do not demonstrate procedural justice can be demotivating. Further, there are likely to be a number of requests to legally challenge this, from officers whose roles are omitted entirely, or omitted in one force but not in another.

In the NPCC's own survey, as well as 10 forces raising issues about equality or unfairness, 3 said that the divisiveness of the measure would be a barrier to using it.

- There is also significant risk that forces will end up in “bidding wars” against one another. We have seen in the past – particularly regarding firearms officers in the South East – that one force offers a premium for a certain role, and then officers from nearby forces transfer in. This drives all the surrounding forces to offer the same or higher premium: and in the meantime service to the public is affected. Moreover, forces whose budgets simply do not allow for these payments to be made lose out.

In the NPCC's survey, 15 of the 39 forces who responded said that their budget or affordability would be a barrier to using the targeted payments.

- There is also risk that this will result in simply moving the recruitment / retention problem from role to role, within forces. That is officers will move into the roles currently attracting a TVP, and other roles will become “hard to fill”.

- Conversely, there is a risk that these discretionary payments will not be used at all, as forces do not want to risk litigation. This will mean officers do not benefit from additional monies that should be available, for want of a well designed system. (An example of when something similar has previously occurred is the X factor. Despite the X factor being introduced and regulations redrafted, no force has ever tried to use it to withdraw money from officers, for fear of falling foul of the Equality Act).

Overall in the NPCC's survey, when forces were asked about barriers to use of the variable payments, there were 39 responses citing barriers, out of 39 forces.

3.4.9 We are also aware that in their recent focus groups with officers, the NPCC discussed Variable payments. The NPCC report states that in the focus groups there was a *“muted and mixed reception for targeted variable payments”*²⁹. In short, officers raised many of the same concerns that the staff associations have been raising for some time, including concerns as to how decisions are taken regarding which roles attract payments; a concern that this would create divisions between teams; and the need to look at other, non-pay related reasons for roles being hard to fill.

3.4.10 As an example of an emerging problem because of the discretion over Variable pay, we are aware that a handful of forces are making payments for tutoring (that is, usually Tutor Constables). But this is extremely uncoordinated (e.g. Hampshire pays £75 per tutee, while Humberside pays tutors £500 per annum). This needs to be standardised urgently, before the 20,000 uplift, as otherwise there will be a force bidding war for mid-career Constables able to undertake this role.

3.4.11 We have repeatedly counselled the NPCC to learn the lessons from Competency Related Threshold Payments and Special Priority Payments: two largely discretionary payments that were removed following the Winsor

²⁹ Reward Framework Focus Groups with Police Officers, NPCC; December 2019 (draft supplied 2019).

Review, due to the problems they created. The case study below was first included in our PRRB submission in 2016.

Case study: Competency Related Threshold Payments and Special Priority Payments: Eligibility (access); applications; success rates

Prior to the Winsor Review of Police Officers' and Staff Remuneration and Conditions, there were two main methods of rewarding federated ranks over and above the incremental pay scale. These were the Competency Related Threshold Payment (CRTP), and the Special Priority Payment (SPP).

CRTPs were intended to reward competency. CRTPs were phased out between 2013 and April 2016, during which time they would have cost the service £284 million.

Special Priority Payments were related to the requirements of the post. They were designed to reward officers who took on posts that were especially arduous or challenging. These, too, were removed following the Winsor Review. This resulted in a £150 million loss to officers' remuneration.

In total, then, the loss of CRTPs and SPPs removed the equivalent of approximately £434 million in potential rewards every 3 years from officers.

One of the reasons for removal was that both CRTPs and SPPs showed serious problems in terms of gender gaps in these payments. For our 2016 submission to the PRRB the PFEW analysed data up to 2013.

We looked at 3 points in the process for achieving these payments: eligibility (access); application; and success. Since access to CRTPs was dependent on time served, these disadvantaged females, who tend to have fewer years in service than males. In 2013, there was a gender gap of 20% for Constables in terms of access to these (i.e. female eligibility was only 80% of male). The application rate had 3.7% difference, also of some concern following the guidance on patterns of thresholds set by the Equality and Human Rights Commission (EHRC). The success rate did not demonstrate a gender gap. Similarly, the gap in eligibility was high for Sergeants, Inspectors, and Chief Inspectors, as was the application gap: but at all ranks the success rate was negligible. Likewise for SPP the gender pay gap was in excess of the 5% threshold set by EHRC as demonstrating cause for concern, for all federated ranks. Only for Superintending ranks was the gap below the thresholds set by EHRC.

Whilst the eligibility gap can only be addressed by encouraging females to stay in service longer, and is not a function of the pay system per se, but rather of the ability of the service to retain females, the application gap is a cause for concern, suggesting females are either less likely to be put forward, or less likely to apply for these payments. "The gender gap may well be a function of the managerial discretion allowed on these payments. This should be remembered when introducing any targeted reward system in policing".³⁰

³⁰ Submission to the Police Remuneration Review Body by PFEW and the PSAEW; 2016

3.4.12 We do not believe the current design of the TVPs offers any more protection against unintended consequences, such as a gender pay gap, than did the design of CRTPs or SPPs.

3.4.13 We asked a number of questions in this year’s Police Superintendents’ Association Pay and Morale survey, to assess whether TVPs are currently being used, and whether there is any cause to suspect that the usage may not support equality.

3.4.14 The results are below. These are worrying. Females were less likely than males to be able to access the payments in principle. And when females applied their success rate was only 68% of that of males.

**Case study: Targeted Variable Payments, Superintending ranks:
Eligibility (access); applications; success rates**

We asked the Superintending ranks whether they believed they fulfilled the criteria to be eligible for a bonus payment; whether they had actually applied; and whether they had been successful.

There are a relatively small number of responses: nonetheless these data should be taken as indicative of a potential problem emerging.

As for CRTPs and SPPS, females seemed less likely to fulfil the criteria for eligibility for these payments. Female eligibility was only around 85% of that of males (compared to CRTPs, where it was 80%). More of those females who were eligible went on to apply, but they are much less likely to have succeeded, with only 24% of females succeeding compared to 35% of males. (That is their success rate was only 68% of that of males).

Eligibility (access):

Did you fulfil the criteria to be eligible to apply for a bonus payment between 2017 and 2020?

	Response		
	Yes	No	I don’t know
Female	54% (116)	30% (64)	15% (33)
Male	63% (385)	23% (143)	14% (84)

Applications:

To date, have you applied to receive a bonus payment?

	Response	
	Yes	No
Female	37% (41)	63% (70)
Male	32% (114)	68% (241)

Success:			
Was your application for a bonus payment successful?			
	Response		
	Yes	No	I don't know (e.g. the application is still being considered)
Female	24% (10)	61% (25)	15% (6)
Male	35% (40)	54% (61)	11% (12)

3.4.15 These findings illustrate some of the potential unintended consequences of variable pay.

3.4.16 Additionally, as Chief Constables have the discretion to move officers from role to role, we have significant concerns as to how officers will be protected from pay reductions should a Chief Constable decide to move an officer against his or her will.

Variable pay: an alternative way forward

3.4.17 Accepting that there is a need for pay to reward hard to fill, especially risky, and arduous roles, we believe there are two possible ways of designing this.

3.4.18 The first, as currently followed by the NPCC, is driven by what local Chief Constables do. We have outlined some of the risks of this: negative impacts in terms of equality, and litigation; perceptions of unfairness and favouritism, leading to lower morale and attempts at legal challenge; force bidding wars for certain officers; moving the recruitment / retention problem from role to role; a failure by Chiefs to award bonuses for fear of litigation. As evidenced above, this method risks repeating the failings of CRTPs and SPPs.

3.4.19 The second, which we advocate, is to introduce Variable pay in a more structured manner. An internal benchmarking exercise, comparing roles and weighting these, should be undertaken. Roles could be rank ordered based on clear criteria, and perhaps using expert panels to make assessments. This would allow the rationale behind any additional payments to be made explicit, and would help to ensure procedural justice within the system. We believe this would help to communicate the variable pay to officers, allaying fears and

avoiding challenges. This method would also significantly lessen the risk of discrimination, being based on explicit criteria.

Recommendation 6: Reconsider the method used for Variable pay, and the EIA

3.4.20 **Recommendation 6:** it is recommended that the NPCC reconsider the method currently being used to introduce Variable pay. The NPCC must, as a matter of urgency, provide an acceptable EIA on this. We have sought to have visibility of the NPCC legal advice.

Recommendation 7: Independent scrutiny of the pay reform plans

3.4.21 **Recommendation 7:** Last year the PRRB sought for the NPCC to seek independent scrutiny of their pay reform plans. This has not been done. We echo that recommendation.

Value Variable pay

3.4.22 We understand that the NPCC intend to seek for the upper limit of the TVPs to be changed from £4,000 to £5,000. Clearly as staff associations we seek for our members to be able to access all the funding that the government has made available for remuneration. We therefore do not seek to reduce this bonus payment from that which is offered. However, we believe the process for award must be reviewed and amended, as described.

Recommendation 8: Uplift the TVP to £5,000, and undertake recommendation 7

3.4.23 **Recommendation 8:** We therefore recommend that the PRRB accept the NPCC's recommendation that the bonus is uplifted to £5,000: but we seek for recommendation 7 to also be accepted.

3.5 Constables' pay scale

3.5.1 In August PFEW hosted two workshops wherein the NPCC outlined some thoughts regarding the Constables' pay scale.

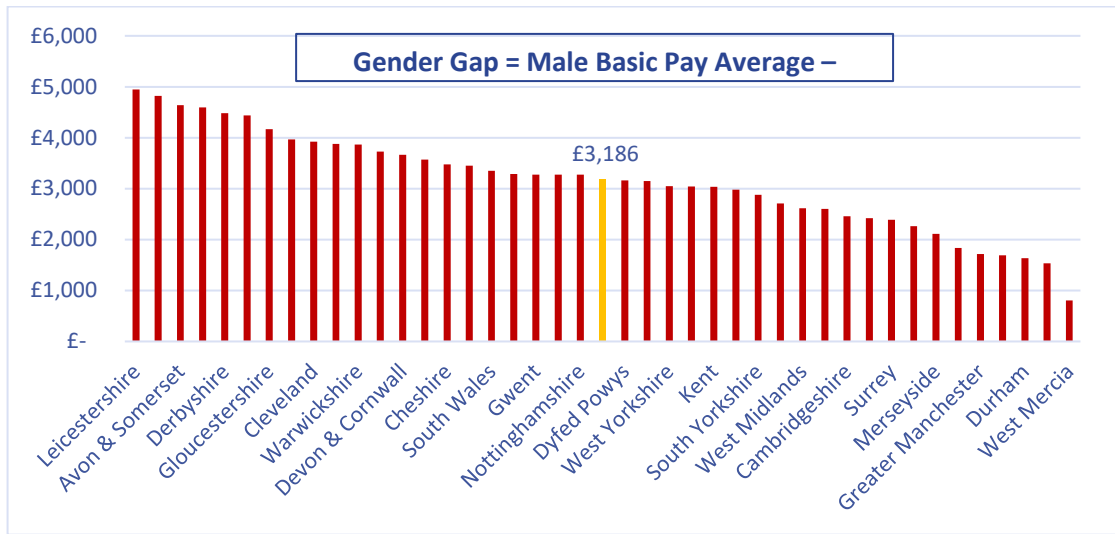
3.5.2 At that time, we understood that the NPCC were considering two main changes:

- First moving from fixed pay points to broader discretion within stages. (That is, extending the discretion that currently exists in the probationer stage to the foundation and established stages).
- Second reducing the number of pay points.

3.5.3 The staff associations do not wish to see discretionary pay introduced, as experience shows that it causes unfairness and inequality.

3.5.4 In fact, even with the current pay scale, where there is consistent progression and little discretion, females earn less than males. This is in some part a function of the fact that females tend to leave service earlier. However, our view is that the gender gap – which is already bad – would be worsened considerably if more elements of the current incremental scale were made discretionary.

Figure 10: England and Wales: Constables' Basic Pay Gender Gap by Force



3.5.5 Further, officers have a deep rooted mistrust of discretionary pay. In our Pay and Morale survey 2019 (to which we had just 19,654 responses),³¹ we asked whether officers would believe it to be fair if their exact salary were to be at Chief Constables' discretion, and questions regarding the degree to which officers would believe broad pay bands to be fair.

Table 4: Officers' views of discretionary pay: fairness

Question	% Unfair	% Fair
Broader pay bands rather than specific pay points	62%	12%
Each band to have a range of around £3,000 and £5,000	58%	15%
Officers' exact salary to be at Chief Constables' discretion	76%	8%

3.5.6 We do, however, recognise the benefits of ensuring that Constables get to the top of the pay scale faster than they currently can. We believe this will be necessary both to recognise the increased burden on them, given the need to mentor the significant numbers of new recruits, and to retain them.

³¹ PFEW Pay and Morale Survey 2019; Jan 2020, R100/2019; N. Chandler. (Data from presentation to National Board by F. Boag-Munroe, September 2019).

3.5.7 In his review of Pay and Conditions in 2011 Winsor recommended a

“new, shorter pay scale for Constables that is properly linked to the time over which increased experience results in increased competence”, and “contribution-related pay progression and skills threshold tests [to] ensure that only those who make a full contribution to the police service, and are able to demonstrate the necessary skills and knowledge, earn the maximum salary”. (Vol 2, P325).

3.5.8 Since then, the College of Policing has introduced competence based assessments for Constables. The staff associations have worked diligently with the College to design and implement what Winsor envisaged as the lower threshold payment, the Assessing and Recognising Competence assessment.

3.5.9 But the first part of Winsor’s recommendation – that the pay scale should be shortened – has been largely forgotten. Ironically, in fact, the pay scale has been lengthened instead, with the introduction of the -1 pay point, initially set at £18,000.

3.5.10 Due to the 20,000 uplift the work on competence related pay for the higher threshold payment seems to be largely in abeyance. But this is not officers’ fault, and they should not be penalised because the programme has stalled.

3.5.11 We believe that a shorter pay scale for Constables would help to retain more of the early career officers that are essential during what will surely be a turbulent time, with so many new recruits.

3.5.12 We understand that officers should be performing competently in order to achieve a higher pay point. In the absence of any new assessment mechanism, (and of PDRs, which we deal with in Chapter 4) we believe it is right that officers should be assumed to be performing competently unless there is compelling evidence to the contrary, and they are deemed to be underperforming. That is, any officer on an Unsatisfactory Performance Procedure (UPP) could be deemed as not meeting performance criteria and would not progress to the next pay point until this is resolved. Others would be

assumed to be competent, and would progress. (We do not believe that officers on UPP should lose existing salary, and face a reduction in pay).

Recommendation 9: Reduce the number of pay points for Constables

3.5.13 **Recommendation 9:** It is recommended that the number of points on the Constable pay scale be reduced from the current 9 points (-1, £18,450 through to 7, £40,128). Later in this document we make a case for points -1 and 0 to be removed. We believe at least 2 other points should be removed, to reduce the scale to 5 or 6 points, and enable officers to reach the top faster.

3.5.14 We believe that some forces are already considering this type of option, as they recognise that there is a need to keep officers who are currently leaving after around 5-10 years, and see this as a way to incentivise them to stay. This could be crucial in achieving the uplift of numbers sought.

3.5.15 An appropriate pay scale for Constables might therefore be:

Pay point 1	£24,177
Pay point 2	£26,370
Pay point 3	£29,670
Pay point 4	£34,098
Pay point 5	£40,128

That is, removing the current pay points -1,0, 2 and 4.

3.5.16 Later in this submission we make a case for the introduction of new top of the scale pay points for all ranks, including Constables. In that case, we would suggest a 6 point scale with the top being £43,790, or a 5 point scale if the current top point were removed.

3.5.17 Removing some of the pay points might also help to redress some of the current gender gap in basic pay, which is partly a function of females leaving service earlier than males.

Recommendation 10: Assumption of competence unless on UPP

3.5.18 **Recommendation 10:** It is recommended that officers are deemed to be competent unless on UPP, and that progress up the pay scale is only restricted to those not deemed to be competent.

3.6 **Sergeants' pay scale**

3.6.1 Although it has not been subject to discussion in the Police Consultative Forum (PCF) we understand that the NPCC have a growing concern that officers are unwilling to apply for a promotion from Constable to Sergeant, in part because the pay differential is not deemed adequate reward for the extra responsibility. (It is currently just under £400). We understand that the NPCC are likely to recommend that the lowest pay point on the Sergeant pay scale be removed, and that all Sergeants currently on that point are moved up the scale with immediate effect. All new Sergeants would commence on the current pay point 2, £42,893.

Recommendation 11: Remove the lowest pay point for Sergeants

3.6.2 **Recommendation 11:** We agree the NPCC position of removal of the lowest pay point for Sergeants, so long as all those on that pay point are immediately moved up to the next pay point. We believe this may help with the need to encourage an extra 1000 new Sergeants over and above the normal targets.

3.6.3 However, we believe it would also be appropriate to add an additional pay point at the top of the pay scale, to ensure that Sergeants continue to be motivated and retained.

Recommendation 12: New top of the scale points should be set for all ranks, to incentivise retention

- 3.6.4 Indeed, because officers' pay has fallen so far behind inflation, and there is now an urgent need to encourage officers to stay in service, we believe that all ranks should have a new top pay point. At a time when the numbers of officers must increase to around 116.5% of the current level within 3 years, we believe urgent action is necessary to incentivise retention.
- 3.6.5 Our underlying argument is that if the numbers of officers are to be returned to 2010, then in order to ensure that recruitment and retention of these numbers can be maintained, it makes sense to return real terms pay to that level too. We therefore suggest that the appropriate new top spine points should be set at the level the top of the scales would have been had these kept pace with CPIH inflation. (The supporting analysis is in Chapter 5).

Table 5: New top of the scale points for all ranks

Constables	£43,790
Sergeants	£49,212
Inspectors	£60,856
Chief Inspectors	£64,655
Superintendents	£87,038
Chief Superintendents	£94,249

4 Chapter 4 Staff Associations' perspectives on matters that the remit letter stated would be covered in the NRT submission

4.1.1 The remit letter circulated on 5th November specified that the NRT submission would set out evidence on a number of matters. While we have not yet seen the NRT's submission, we believe it is appropriate for the staff associations to reflect on each of these matters.

4.2 Impact of pay reform

Benefits realisation

4.2.1 In our first PRRB submission, in 2015, we stated:

“Going forward, we recommend changes so that:

- *an evidence based approach to workforce planning is adopted, with appropriate and transparent data;*
- *should significant changes be suggested to pay and conditions, then appropriate modelling of likely impacts should be undertaken; and*
- *recent changes should be monitored for their impact, to check whether intended and unintended consequences have accrued.” PFEW and PSAEW submission to the PRRB,(Jan 2015), P.11.³²*

4.2.2 That same year we also stated:

“We believe that to achieve such a system, existing anomalies need to be addressed. These include the need for a clear rationale for each element of the remuneration package, and a comparison to jobs with similar knowledge, skills, and attribute requirements; consideration of the appropriateness of pay for differing ranks, and whether a single spine point based method for each rank addresses the different organisational and personal drivers of pay; and consideration of how changes to one element impact on the package overall, and its efficacy....We ask that the Home Office gives a clear statement of the aims of the pay system; what it should achieve as a whole, and how elements contribute;

³² Submission to the Police Remuneration Review Body on behalf of the Police Federation of England and Wales, and the Police Superintendents' Association, Jan 2015.

and how changes will be monitored in future". (P23, PFEW and PSAEW submission, 9th Jan 2015).

4.2.3 In our submission in December 2016, we outlined the benefits realisation model adopted by the Armed Forces when introducing the New Employment Model in 2010. We recommended that a similar approach to benefits realisation be undertaken in the pay reform programme.

"During the design phases, a Benefits Realisation model was developed, with all suggestions for change to pay and terms and conditions being potentially assessed against the key drivers of the new Armed Forces' "offer", these being attractiveness, agility, and affordability".

4.2.4 We stated that if this were not achieved, the main risks would be:

- *"that the approach will continue to be piecemeal;*
- *that this will cause positive change impacts to be diluted;*
- *that some forces will introduce change without reference to others, having unintended consequences;*
- *that – depending on how it is introduced – a new system will be perceived as a breach of the psychological contract, and be demotivating;*
- *that a new system may cost more to implement than it will realise in benefits;*
- *that there will be an impact on equal pay."*

4.2.5 We were heartened that last year the PRRB singled out the need for a benefits realisation plan, stating that the rationale for change was still not clear,³³ and directed the NRT and the Home Office to undertake this work.

³³ PRRB Fifth report, Para 2 and 2.42-2.46: The PRRB stated that it is still concerned about matters it raised in previous years: notably that the rationale for change has not been properly articulated, nor have the expected benefits been stated.

Indeed, we wrote to the Home Office on 19th August 2019 reinforcing this need. We stated that these concerns could no longer simply be assumed to be those of the staff associations, and that we should not be left in a position where only we were holding the NPCC team to account. We sought reassurance that the actions sought by the PRRB would be overseen by the Home Office, as the employer body ultimately accountable. Our letter, and the response received on 19th December 2019, are at Annex D. Unfortunately this exchange of letters demonstrates that the Home Office has failed to take any meaningful role in the last year, or to engage fully.

4.2.6 There has been no benefits realisation model produced.

Recommendation 13: Produce a benefits realisation model regarding pay reform

4.2.7 **Recommendation 13:** We recommend – as we have done for six years now – that a benefits realisation model for the pay reform is produced, outlining the intended benefits, the rationale as to why the NPCC believe that the actions taken will result in these benefits being achieved, and consideration of unintended consequences.

Equality Impact Assessment

4.2.8 The police service has struggled to become representative of the people it serves. The two diagrams below demonstrate the numbers of females and non-white officers by force³⁴.

4.2.9 These data demonstrate the need to carefully assess any suggested policy for its equality impact.

³⁴ Police Workforce Pay and Allowances 2018-2019; PFEW report R004/2020, R Ferrer. (Data from Home Office Pay census).

Figure 11: England and Wales: Proportion of Male and Female Police Officers by Force

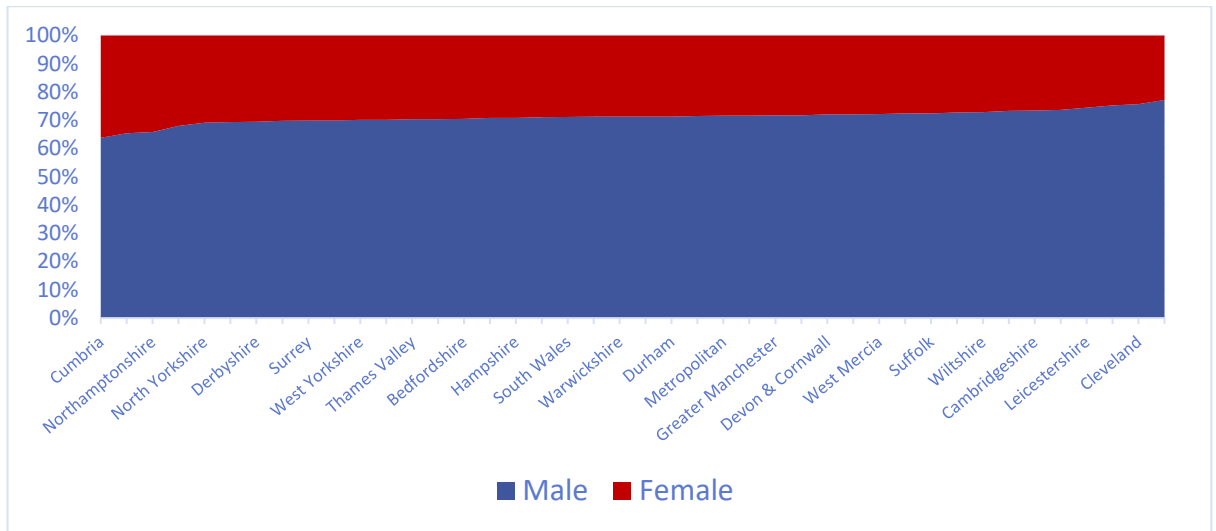
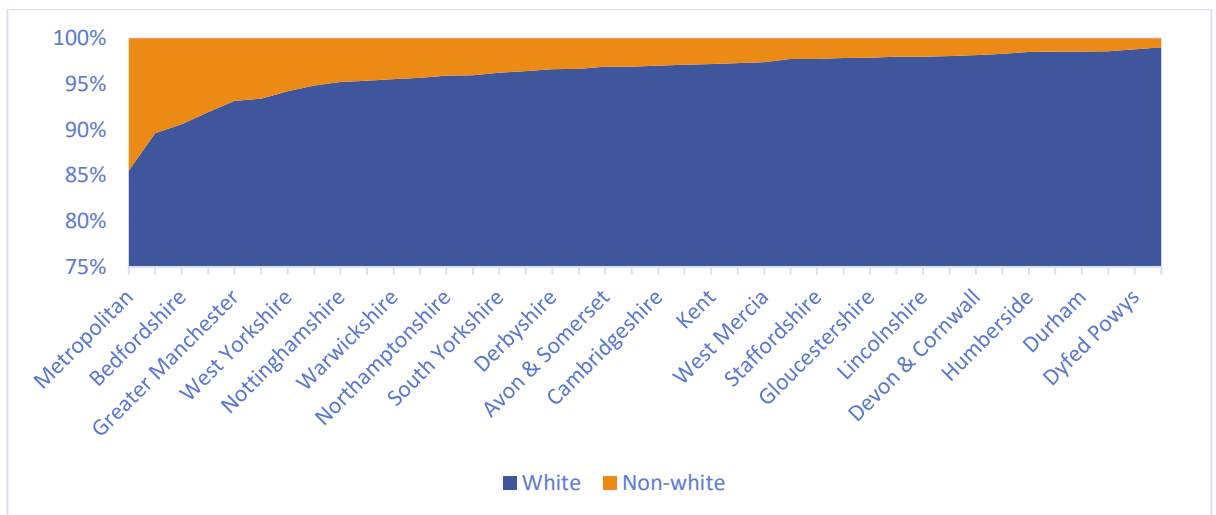


Figure 12: England and Wales: Proportion of White and Non-White Police Officers by Force



4.2.10 We have lobbied throughout the pay reform design process for an Equality Impact Assessment to be undertaken. It is a matter of public record that we have raised concerns about this in every PRRB submission since the pay reform was proposed, and at all applicable Police Consultative Forum meetings.

4.2.11 We believe that the NPCC has a statutory duty to conduct an EIA when setting out their policy intent, in keeping with the Brown principles.

The Brown Principles

The 'Brown principles' set out how courts interpret the actions that public sector bodies must demonstrate in order to show due regard to the Equalities Act. They are not additional legal requirements but form part of the Public Sector Equality Duty as contained in section 149 of the Equality Act 2010. Under the duty public bodies must, in the exercise of their functions, have due regard to the need to: Eliminate unlawful discrimination, harassment, victimisation and other conduct prohibited by the Act; Advance equality of opportunity between people who share a protected characteristic and those who do not; Foster good relations between people who share a protected characteristic and those who do not.

In summary, the Brown principles say that:

- Decision-makers must be made aware of their duty to have 'due regard' and to the aims of the duty.
- Due regard is fulfilled before and at the time a particular policy that will or might affect people with protected characteristics is under consideration, as well as at the time a decision is taken.

Due regard involves a conscious approach and state of mind. A body subject to the duty cannot satisfy the duty by justifying a decision after it has been taken. Attempts to justify a decision as being consistent with the exercise of the duty, when it was not considered before the decision, are not enough to discharge the duty.

General regard to the issue of equality is not enough to comply with the duty.

- The duty must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- The duty has to be integrated within the discharge of the public functions of the body subject to the duty. It is not a question of 'ticking boxes'.
- The duty cannot be delegated and will always remain on the body subject to it.

It is good practice for those exercising public functions to keep an accurate record showing that they had actually considered the general equality duty and pondered relevant questions. If records are not kept it may make it more difficult, evidentially, for a public authority to persuade a court that it has fulfilled the duty imposed by the equality duties.

4.2.12 We received a draft EIA on 29th August 2019. We responded as quickly as possible, to try to give the NRT the longest possible period to attend to comments, and sent this on the 13th September 2019.

4.2.13 At that stage, we believed the draft EIA to be seriously flawed. We felt necessary to refer the NRT to the Public Sector Equality Duty, and specifically the Brown principles derived from case law (*R (Brown) v Secretary of State for Work and Pensions* [2008] EWHC 3158) which include “the duty must be fulfilled both before and during consideration of a particular policy, and involves a “conscious approach and state of mind”. It is not, therefore, sufficient to simply try something and then measure impact retrospectively.

4.2.14 Further, in the first draft EIA, the thought process followed was not transparent. Although in some places it was stated that there was no likely impact, there was no rationale stated as to how that had been determined, and we were unable to draw the same conclusions.

4.2.15 More recently, on 10th January 2020 we received another draft of the EIA. Unfortunately this is subject to many of the same flaws as the earlier draft. And rather than take on board our comments, including the fact that we believe that it is necessary to conduct the EIA at the point when the policy is being considered, the NPCC has chosen to state that the EIAs for Variable pay (which they now call Temporary Variable Payments) will be the responsibility of the forces using them, and that these forces will do them only for those roles that the Chief Constable has already decided should attract a TVP.

4.2.16 We have therefore written to the NPCC lead stating that we believe both the process outlined in the latest EIA is flawed, and the content of it is too.

4.2.17 In particular, the terminology is very loosely defined, and this, in turn, limits the ability of the document to evidence a clear narrative. It is our understanding that the EIA should tell a story, whereby the analysis of any possible risks or adverse impacts is shown; then consideration is given as to how these could be mitigated, and mitigations set out; and finally a plan for monitoring future impact is laid out (sometimes with contingent mitigations).

This structure would lend clarity and demonstrate proper consideration of equality impacts. And yet, in many cases the action cited in the NPCC document as “mitigation” is that data will be collected. In our view this is not mitigation, but monitoring. The act of collecting data does nothing, in itself, to address any risks identified. Indeed, the NPCC’s own document starts by saying that an EIA should not merely check whether an action has had a harmful effect: and yet goes on to give examples of where they themselves take exactly that approach.

4.2.18 The staff associations are currently in an uncomfortable position regarding the EIA. At this stage of the programme we are deeply concerned that it will not be possible to complete the EIA in a way that addresses s149 of the Equality Act, the PSED. Both our letters to the NPCC regarding the EIAs produced in the last seven months are at Annex G.

4.2.19 We have sought for the EIA to be done at the appropriate time and manner. We have provided advice and comments on a number of occasions: but these have not been addressed. At this point, the staff associations have withdrawn from workshops which the NPCC asked us to attend: not because we do not believe an early EIA to be essential, but because the National Secretaries of the PFEW and PSA feel that to participate at this late time is a conflict of interest.

4.2.20 To be clear, the staff associations take the rights of our members with protected characteristics very seriously indeed. We prefer to collaborate with the NPCC to ensure risks are addressed. But we will take whatever action is necessary to make sure that our concerns are heard.

Recommendation 14: NPCC’s EIA to be assessed by independent, qualified professional

4.2.21 **Recommendation 14:** Given the PRRB’s statement in its Fifth report requiring the legal requirement for an EIA, and the PRRB’s request to be

notified of any update regarding the EIAs³⁵ we would ask that the PRRB join us in seeking for the NPCC's EIA to be assessed by an independent suitably qualified professional. We would like an open and transparent process whereby we are sighted on both the legal advice the NPCC have on this matter, and on advice from their equalities' advisor.

4.3 Consideration of proposed salaries

4.3.1 We understand that the NPCC will set out its consideration of proposed salaries in its PRRB submission. At this point, we understand that the NPCC has moved away from its position of summer 2019, that the Constables' pay scale should be reduced, and is now suggesting that the Sergeants' pay scale will be reduced instead. We have set out our own positions regarding the pay scales in recommendations 9-11, and regarding the pay uplift in recommendation 16.

4.4 Assessment of level of force maturity for proposed assessment points.

4.4.1 As recently as summer 2019 the NRT have been proposing that the move to Foundation and then Established Constable pay points would be dependent on formal assessment, to satisfy the Treasury directive that pay must be productivity based. In a workshop with the staff associations on 5th August 2019 the NRT suggested 5 costed options for the Constables' pay scale. All 5 options had a competence assessment (ARC, College of Policing led) between pay point 3 and 4, to pass from Probationer to Foundation stage, and another (when available, also College led) between pay points 6 and 7, to pass from Foundation to Established Constable stage. Four of the 5 options also had a competence (PDR) assessment between pay point 4 and 5.

³⁵ PRRB Fifth report, 2019 Para 3.110 "We note the legal requirement to undertake Equality Impact Assessments, and the relevance of such assessments to the workforce and pay reform work. We ask that the parties keep us updated on the outcome of these assessments".

- 4.4.2 The PRRB noted in its 2019 report that “*a new pay mechanism built on competence will necessarily require robust performance measurements to be in place*”,³⁶ not least because of the significant cultural change.
- 4.4.3 As reported in Chapter 2 of this document, much of the College of Policing work on ARC and the Established Constable threshold assessment has been deprioritised or delayed following feedback from pilot studies.
- 4.4.4 Additionally, it is highly likely that the existing officer appraisal process (usually known as the Performance and Development Review (PDR) process will, of necessity, play a significant part in any competence assessment. It is widely acknowledged that performance reviews help to develop and motivate individuals and to ensure an organisation remains on course to meet its objectives.³⁷ This fact, coupled with increased scrutiny of the public sector over the last decade, would seem to suggest that PDRs should be a priority in all forces.
- 4.4.5 And yet, anecdotally we are aware that many officers tell us they haven’t had a PDR for some time. In response to the PFEW Pay and Morale survey, 49% of officers said they were dissatisfied with the PDR process³⁸.
- 4.4.6 We are aware that the NPCC have recently conducted a survey of force HR departments, asking for information about their PDR processes, and we are pleased that this initiative has been undertaken. The NPCC work included a section asking whether forces have PDR processes. Nearly all say they do, and that they apply these to officers and staff.
- 4.4.7 However, crucially the NPCC did not ask how many PDRs had actually been completed in forces. We believe this is the critical information: it is all very well

³⁶ Police Remuneration Review Body, Fifth Report. England and Wales 2019.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819563/PRRB_2019_Web_Accessible_2_.pdf

³⁷ ARMSTRONG, M. (2017) Armstrong's handbook of performance management: an evidence-based guide to delivering high performance. 6th ed. London: Kogan Page.

³⁸ Police Federation of England and Wales Pay and Morale Survey 2019: R100/2019 by Nicola Chandler.

for forces to report that they have a system, but if that system is not being used, then the process cannot be said to be mature.

4.4.8 For this submission, we sought to find out direct from forces to what extent officers are actually given formal assessments and provided with feedback. We sought this via a Freedom of Information request. We followed this procedure because we felt that forces would be obliged to provide accurate data, as they would be aware that the information supplied could be subject to scrutiny by the Information Commissioner's Office.

4.4.9 We sent the FOI to 43 forces in October 2019, as follows:

1. Does your force have a recognised Police Performance Review process?
2. How many officers have completed a Police Performance Review with their line manager (or appropriate person) over the 12 months from 1st October 2018 to 30th September 2019?
3. Please provide the data requested at 2. broken down by rank. That is, please state how many of each of the following ranks - Constables, Sergeants, Inspectors, Chief Inspectors, Superintendents, and Chief Superintendents – have completed a PPR in the last year.

4.4.10 The data returned to us by the third week of January (well after the 20 working day limit for FOIs to be addressed) is below. We have not broken down the data by rank as several forces either did not do so, or amalgamated several ranks to protect identities.

4.4.11 Most forces were able to give us data for the exact period of 12 months specified, although several stated that the data pertained to a 12 month period that was slightly different (e.g. April to April). So long as the data covered a recent 12 month period (i.e. one that had finished within six months of the dates originally sought) we considered it worthy of inclusion.

4.4.12 A number of forces told us they do not do PDRs for probationers. Given that around 10% of officers overall have joined in the last two years, we have calculated a percentage return in force that allows for this.

Table 6: Freedom of Information request: Proportion of officers having PDRs, by force.

Force	No. Officers ³⁹	No. PDRs	Proportion of officers with PDRs	Proportion adjusted for probationers	Reason for non-compliance
Avon & Somerset	2,676	1499	56.01	62.24	
Bedfordshire	1,164		0.00		
Cambridgeshire	1,447		0.00		
Cheshire	2,006	576	28.71	31.90	
Cleveland	1,198	1038	86.62	96.25	
Cumbria	1,160		0.00		See explanation ⁴⁰
Derbyshire	1,767	1253	70.93	78.81	
Devon & Cornwall	3,000	2581	86.04	95.60	
Dorset	1,223	721	58.94	65.49	
Durham	1,118	854	76.39	84.88	
Essex	3,071	1952	63.56	70.63	
Gloucestershire	1,073		0.00		
Greater Manchester	6,444		0.00		
Hampshire	2,697	1554	57.61	64.02	
Hertfordshire	2,009		0.00		
Humberside	1,889	696	36.84	40.93	
Kent	3,553	2483	69.89	77.66	
Lancashire	2,895	980	33.85	37.61	
Leicestershire	1,829	1480	80.92	89.91	
Lincolnshire	1,096	556	50.72	56.38	
London, City of	739		0.00		
Merseyside	3,396	2642	51.82	55.51	
Metropolitan Police	30,435	3579	11.76	13.07	
Norfolk	1,609				See below
Suffolk	1,172		0		See below
Norfolk and Suffolk joint	2,805	728	25.95	28.84	
Northamptonshire	1,187	540	45.48	50.54	
Northumbria	3,081		0.00		
North Yorkshire	1,377		0.00		
Nottinghamshire	1,936		0.00		

³⁹ Data taken from Police Workforce England and Wales, 31 March 2019; <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2019>

⁴⁰ Cumbria supplied data well outside the FOI deadline, and after this report had been written. Moreover, the respondent explained that the data pertain to a “Strengths Based Conversation” review, which is not a PDR: therefore the data are not included in calculations. In Cumbria 810 officers (68%) had had Strengths Based Interviews.

South Yorkshire	2,370	2052	86.59	96.22	
Staffordshire	1,567		0.00		
Surrey	1,882		0.00		
Sussex	2,629		0.00		
Thames Valley	4,149	Not supplied	84.00	Not calculable (no data)	
Warwickshire	817	463	44.44	62.98	
West Mercia	1,989	720	27.15	40.23	
West Midlands	6,495		0.00		
West Yorkshire	5,137		0.00		
Wiltshire	992	220	22.17	24.63	
Dyfed-Powys	1,145		0.00		
Gwent	1,308	784	59.92	66.58	
North Wales	1,458		0.00		
South Wales	2,986	1717	57.49	63.88	

Key re non-compliance:

	No reason given – nil response
	Don't keep central records, or format would be manual
	New HR or PDR system – can't provide data
	Other

4.4.13 Of all 43 forces:

- 18 forces complied, without any caveat.
- 9 forces did not respond within the FOI timescales.⁴¹
- 7 forces responded that they did not keep central records, or that records were in a format that would not allow them to respond within the FOI time period.⁴² (4 of these provided data, 3 did not). Norfolk and Suffolk provided 1 response but are counted as 2 forces.
- 5 forces said they could not provide data due to a new HR or PDR system.⁴³

⁴¹ Cambridgeshire, Lincolnshire, City of London, Northumbria, North Yorkshire, Nottinghamshire, Sussex, West Midlands, West Yorkshire. As noted above, Cumbria replied outside the time limits, and because the report pertained to Strengths Based Interviews rather than PDRs, the data have not been included.

⁴² Three of these provided no data (Surrey, Greater Manchester, and Hertfordshire) while 4 others provided some data (Merseyside, Norfolk and Suffolk, Thames Valley).

⁴³ Bedfordshire, Gloucestershire, Dyfed-Powys, Staffordshire, and North Wales.

- 4 forces provided another reason for caveating their data, albeit they provided some response.⁴⁴

4.4.14 26 forces therefore supplied some data, (60% of forces): this was often caveated, however. For example, while Thames Valley said it had an 84% completion rate, it also said the request was refused as the data were not held in a retrievable form, and so no actual data were supplied other than the percentage figure. It is therefore difficult to be sure the data are verified. Merseyside was unable to distinguish between officers and staff in the PDR system, so the figures provided are from both groups together. Norfolk and Suffolk provided the number of PDRs in progress, rather than completed. Derbyshire provided numbers from a system called “Check In” which relates only to potential / performance for succession planning rather than full PDRs. (Staffordshire also stated that this was the system in use, but was not able to provide data).

4.4.15 8 did not respond with data. This included West Midlands, the second biggest force in England and Wales⁴⁵. Another (Cumbria) replied several weeks after the FOI timescale, and with data that were not from full PDRs: hence Cumbria is included with non-responses. A small number stated they were experiencing too many FOIs to be able to answer in the timescales.

4.4.16 Another 5 replied without supplying any data, albeit giving a reason why they could not. Greater Manchester, for example, (the third biggest force) refused the request, stating that the data would have to be retrieved via a manual search of each individual division’s Divisional Records Management Unit. Likewise both Hampshire and Hertfordshire refused on the basis that data are not in a retrievable form, with Herefordshire stressing that it would require a manual review of “thousands of records, and hundreds of managers to report”.

⁴⁴ Cheshire, Derbyshire, Hampshire, Kent.

⁴⁵ Northumbria sought further information, and Sussex, N Yorkshire, and W Yorkshire sent apologies for the delay. It is always possible for others that IT issues may be a factor.

4.4.17 Even in those forces that report doing some PDRs, the proportion is often very low. In the largest force in England and Wales, the Metropolitan Police, only 12% of officers have a PDR (13% when adjusted). In Cheshire, Norfolk and Suffolk, and West Mercia the figure is around one quarter of officers, while in Humberside and Lancashire it is around one third.

4.4.18 In the forces that provided other caveats, the reasons given included the fact that the report pertained to partially completed PDRs, rather than completed ones (Kent).

4.4.19 In fact, there are only 6 forces that claim to have more than 75% of PDRs complete. These are Cleveland, Devon and Cornwall, Durham, Leicestershire, South Yorkshire, and Thames Valley. (Kent figures reflect partially completed PDRs).

4.4.20 Across the 25 forces that provided data, just under 32,000 officers had PDRs. When this is adjusted for the fact about 10% of officers are likely to be on probation, and don't need to do a PDR, this means we have been able to confirm that about 29% of all officers have PDRs.

4.4.21 It is often misreported that the staff associations have fought against the introduction of competence based pay in policing. This is not true, and the staff associations have always acknowledged that officers who are not meeting the basic standards of performance and are on Unsatisfactory Performance Procedures should not receive incremental awards. To be very clear, the staff associations have consistently insisted that if assessment based competence pay were to be introduced then it must be based on a robust and fair system. Unfortunately, forces have failed to deliver this.

4.5 Proposed timetable for regulatory implementation.

4.5.1 The Home Secretary's remit letter notes that the National Police Chiefs' Council (NPCC) will be submitting a proposed timetable for regulatory implementation of the pay reform proposals taking into account requirements for consultation with interested parties.

4.5.2 The Police Federation of England and Wales (PFEW) and the Police Superintendents' Association (PSA) would both welcome this, as it should provide advance warning for when the Home Office needs to consult interested parties on proposed changes to regulations and determinations and should ensure that sufficient time is built into the timetable for legislative changes to members' terms and conditions for consultation (at least six weeks). However, as we have set out in previous PRRB submissions, we continue to have significant concerns about this aspect of the pay reform process. This is because, at the time of writing this submission:

- there is a lack of detail about the NPCC's proposals for pay reform;
- there is no clarity about what regulatory changes are being sought through the pay reform programme;
- there is still a backlog of other changes to regulations and determinations - this includes the implementation of agreements reached at the Police Negotiating Board dealing with the Children and Families Act 2014 and part time working audit; and
- we have yet to receive draft determinations for consultation to implement the July 2019 recommendations of the PRRB covering the pay award 2019/20, London Weighting, Dog Handler's Allowance and On Call allowance for the federated ranks, despite these being accepted by the Home Secretary in July 2019.

4.5.3 In the PRRB's report last year, the PRRB repeated its concerns from the previous year about the length of time taken to reflect the provisions of the Children and Families Act 2014 into police regulations and determinations. The PRRB therefore remained concerned that these provisions had still not been formally implemented and you urged the Home Office and other stakeholders to consider the lessons that can be learnt from this process so that future changes to employment law can be reflected in police regulations

in a much timelier manner. Regrettably no lessons have been learnt and in terms of the wider pay reform programme the position appears to be becoming ever more confused with a lack of clarity about where responsibility for implementation of regulatory changes lie and what is being proposed by the NPCC.

4.5.4 Section 52A of the Police Act 1996 and regulation 46 of the Police Regulations 2003 set out the provisions governing the requirements for consultation by the Home Secretary when making regulations or determinations on a matter that relates to:

- hours of duty;
- leave;
- pay and allowances; or
- the issue, use and return of police clothing, personal equipment and accoutrements.

4.5.5 Both section 52A and police regulation 46 provide that before making such a regulation and/or determination on matters covering members of a police force below the rank of Chief Superintendent, or police cadets, the Home Secretary shall refer the matter to the PRRB (HS remit letter) and consider the body's report on the matter. Alternatively, the Home Secretary may consider that there is not enough time to refer a matter to the PRRB because the need to make the regulation or determination is so urgent or it is unnecessary to do so by reason of the nature of the proposed regulation or determination (i.e. a matter on which agreement has been reached at the PCF or is of a relatively minor/technical change).

4.5.6 In addition, before making any such a regulation or determination the Home Secretary shall supply a draft of it to, and consider representations made by person who the Home Secretary considers to represent the interests of:

- the persons and bodies who between them maintain police forces e.g. APCCs;
- chief officers of police e.g. NPCC;

- members of police forces e.g. PFEW and PSA; and
- police cadets appointed under section 28 of the Police Act e.g. PFEW.

4.5.7 It is clear, therefore, that statutory responsibility for the drafting and consultation on regulations and determinations rests with the Home Secretary but that before regulations and/or determinations are drafted, a matter needs to have been fully considered by the PRRB and/or the PCF and that those considerations need to be based on detailed proposals.

4.5.8 The backlog of regulations / determinations now required is staggering, and it is difficult to see why this situation has arisen.

4.5.9 To be clear, we often hear that Regulations are problematic because they take so long: as though some barrier is being put in the way of the Home Office drafting these. There is no barrier being placed. The staff associations welcome regulations as being the only protection officers have: a reasonable substitute for a contract of employment for officers, who are not employees. They give clarity and support a fair and equitable implementation of the rules. The staff associations support the drafting of these, and have assisted in drafting. We do this even when the determinations implement rules that we have lobbied against, because the alternative – leaving officers without clarity – is unreasonable.

4.5.10 And yet at this point the Home Office has not been able to incorporate a determination capturing the Children and Families Act, and ensuring Regulations are compliant with broader UK law, for over 5 years. It has failed to draft and consult on last year's pay uplift, which was announced in July 2019 and took effect in September.

Recommendation 15: Review of the regulations and determinations drafting process.

4.5.11 **Recommendation 15:** We recommend that the PRRB seek for the Home Secretary to urgently review what is going wrong with the Home Office drafting process.

5 Chapter 5 Remit letter focus (outside of pay reform)

5.1 General uplift

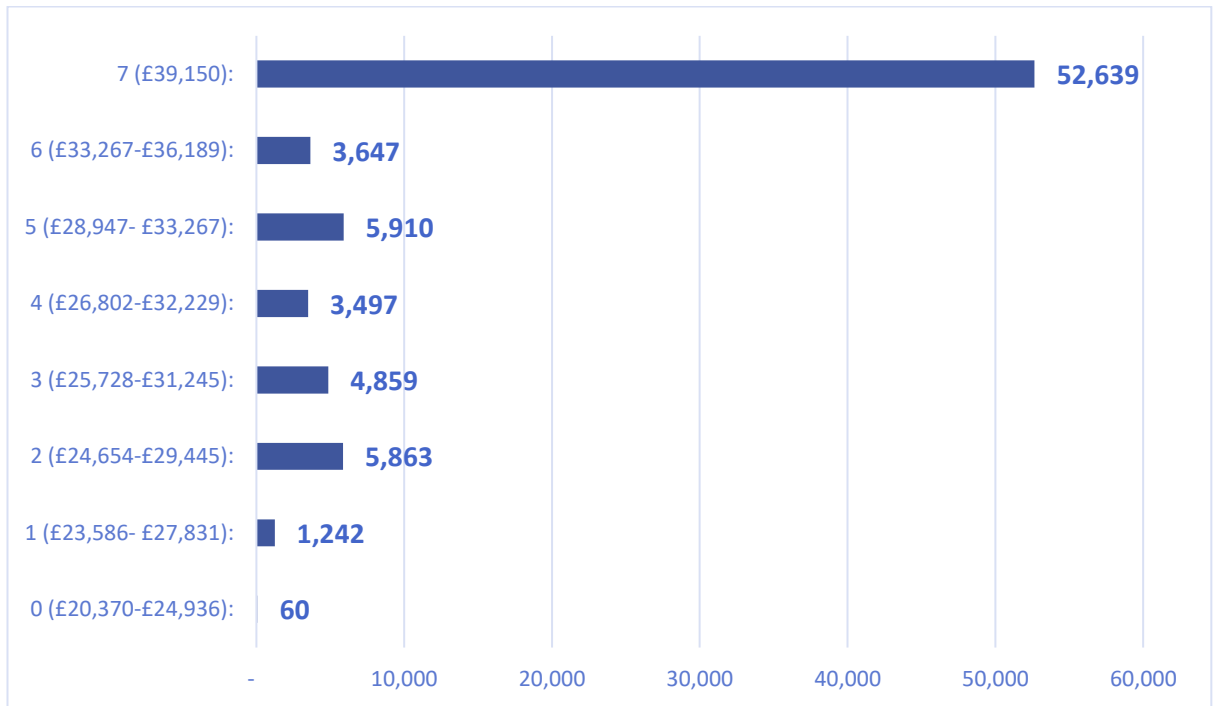
5.1.1 The annual uplift in salary is especially important in a workforce where most officers get no other uplift. It has been claimed that most officers see salary increases each year due to incremental progression: but this is not actually true for the vast majority of officers, who are already at the top of the pay scale.

5.1.2 We used the Home Office's Pay Census data to assess how many officers are at the top of the pay scale, by rank. The diagram below shows full-time Constables. Approximately 78,000 Constables are included in the Home Office's census, and as at March 2019 there were 96,070 Constables,⁴⁶ so clearly the pay census data is incomplete. Nonetheless, the figures suggest that around 5/8 of Constables are already at the top of the scale. Adjusting for missing census data, that is probably around 60,000 Constables in reality. The census data suggest that 10,814 Sergeants are at the top of the scale; as are 2,706 Inspectors; 796 Chief Inspectors; 324 Superintendents; and 130 Chief Superintendents: altogether another 14,700 officers at the top of their respective scales. (These figures are not adjusted for missing data in the census). This analysis suggests that at least 74,770 (61%) of the 123,171 officers in post in March 2019 were at the top of their scale.

5.1.3 For these officers the annual uplift – sometimes known as a “cost of living” uplift – is the only salary increase they receive. Its necessity as a reward for a job well done should not be underestimated.

⁴⁶ Police Workforce, England and Wales, 31 March 2019 second edition, Statistical Bulletin 11/19 18th July 2019 <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2019>

Figure 13: Number of full time Constables on each pay point (excluding pay point -1).



5.1.4 As in previous years, we are including analysis of the economic context, and how past pay suppression of pay has impacted on officers.

5.2 Economic context

5.2.1 As noted at the outset of this submission, police numbers peaked at 143,765 in 2010, and have been declining ever since. The decline in numbers has been matched by a significant decline in real terms pay. In the last year the Government has reversed the policy of reducing officer numbers, and decided to return these to around the 2010 levels.

5.2.2 Our starting point with regard to the pay uplift is that, just as the Government has realised that officer numbers must return to 2010 levels, it stands to reason that real terms pay levels should also be returned to 2010 levels. That is, the levels of pay that were needed in 2010 to attract, retain, and manage 143,765 must arguably be the levels that will be required in order to increase numbers now back up to 142,500.

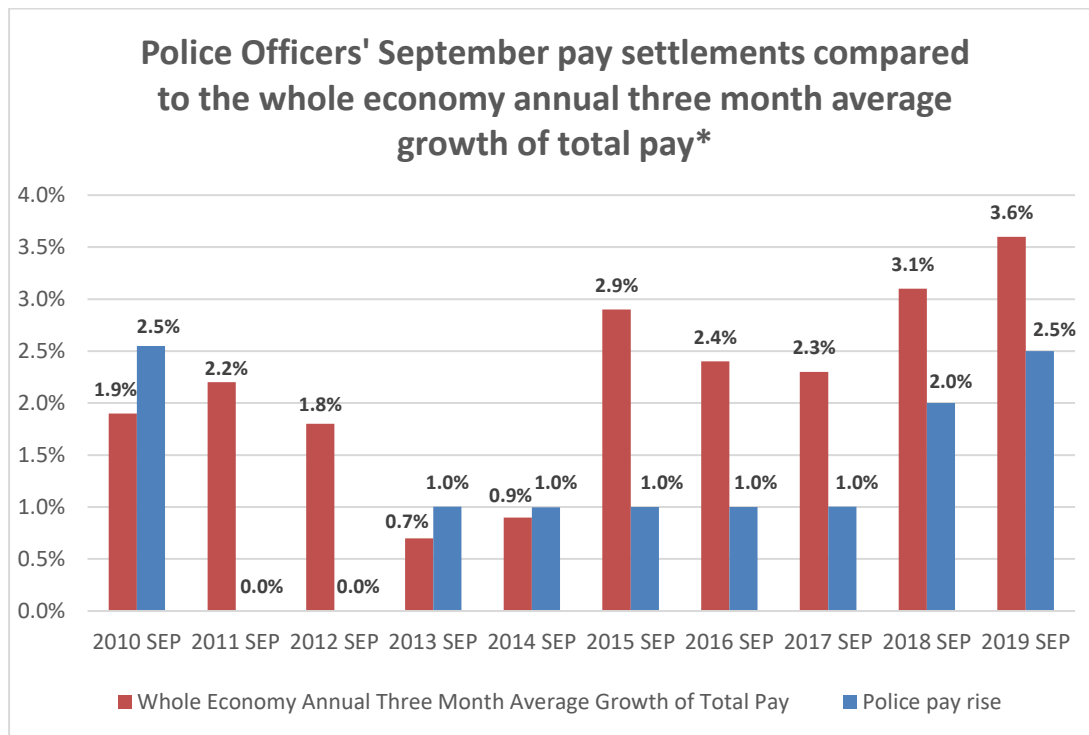
5.2.3 The Coalition Government introduced a two-year public sector pay freeze in the 2010 Budget, and a further 2-year incremental progression freeze was

introduced in 2012. After the freeze ended, and between 2013 and 2017, Police officers' pay rises have averaged only around 1%, excluding the additional 1% unconsolidated increase in 2017. Since 2010, pay rises have been consistently well below inflation rates. As recently as 2018, the 2% salary increase was still well below the three September inflation rate measures of 2.2% for CPIH, 2.4% for CPI, and 3.3% for RPI. It was only in 2019 that officers' pay was increased by 2.5%, which was higher than the contemporaneous inflation rates of 1.7% for CPIH, 1.8 % for CPI and 2.4% for RPI. This means that between 2009 and 2019, police officers' pay rises have repeatedly failed to keep pace with the economy's prices of goods and services.

5.2.4 Further, in order to attract new recruits, police forces must be able to offer an attractive pay package: that is, a package that not only compensates for the inherent risks their work involves, but that makes the role more attractive and competitive in relation to the rest of the UK's labour market. Yet police officers' pay growth in recent years has been consistently lower than pay increases in other sectors of the economy. In the current UK labour market, average wage growth continues to exceed inflation. The Office of National Statistics (ONS) reports that average weekly earnings were up 3.6 % in July to September 2019 for both total pay (including bonuses) and regular pay (excluding bonuses) in the whole economy. In real terms, that means, that after adjusting for inflation, annual growth in total pay is estimated to be 1.8% and annual growth in regular pay is estimated to be 1.7%⁴⁷. See figure below for a comparison between police officers' September pay settlements and the whole economy annual three-month average growth of total pay.

⁴⁷ ONS, *Labour market overview, UK: November 2019*, 12 November 2019, Link: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/averageweeklyearningsingreatbritain/november2019>

Figure 14: Officers' settlements compared to whole economy pay growth



**Average Weekly Earnings (AWE): Whole Economy Year on Year Three Month Average Growth (%): Seasonally Adjusted Total Pay Excluding Arrears⁴⁸.*

5.2.5 Since September 2010, police officers have had pay growth that is 9.8% below the whole UK economy average pay growth. In 2019 the average whole economy growth of pay was 3.6%. This contrasts with officers' uplift last year, of 2.5%, a full 1.1% below the average.

5.2.6 While we are pleased that the Government accepted the PRRB recommendations in 2019, further increases need to be made in order to compensate for previous losses, and in order to increase the competitiveness of the police officer role in relation to other positions in the labour market.

5.2.7 In the following section we show how wide the gap now is between officers' earning power in 2010, and now.

⁴⁸ Source:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/timeseries/kac3/lms>

Methodology

5.2.8 Real pay refers to the value of pay adjusted for inflation. It gives a measure of purchasing power in terms of the goods and services that can be bought in one time period (now) compared to the relative price of the same goods and services in another time period (in this case, back as far as 2010).

5.2.9 This year, we have used the Basic Pay (starting pay point and top of the scale pay point) for each year from 2009 to 2019 for full time officers in each rank, and a number of inflation measures to calculate how the real purchasing power of Basic Pay has changed over time. We calculated the nominal percentage increase of the Basic Pay from one year to the next and set this against different inflation measures for each year, and then compared the cumulative changes to the base year 2009.

5.2.10 There is no single perfect and universally recognised measure of inflation. We used the following:

- The Consumer Prices Index including owner occupiers' housing costs (CPIH) 12-month inflation rate. According to the Office for National Statistics (ONS) *"The Consumer Prices Index including owner occupiers' housing costs (CPIH) is the most comprehensive measure of inflation. It extends the Consumer Prices Index (CPI) to include a measure of the costs associated with owning, maintaining and living in one's own home, known as owner occupiers' housing costs (OOH), along with Council Tax. Both are significant expenses for many households and are not included in the CPI"*.⁴⁹ We think that this is the most appropriate inflation measure to use in order to assess the purchasing power of the salaries of police officers. From now on, we intend to use this measure⁵⁰. We did

⁴⁹ Source:

<https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/consumerpriceinflation/october2019>

⁵⁰ The Consumer Price Index including owner-occupiers' housing costs (CPIH) was introduced in 2013. The index is the same as CPI, but it includes council tax and owner-occupier housing costs. The ONS measures the latter through an approach known as 'rental

not previously use it, as it was not officially recognised by ONS between 2014 and 2017 due to issues in rent calculation and its incorporation in the measure: but it has now been recognised again.

- The Consumer Prices Index (CPI) 12-month inflation rate. The ONS definition states that “the CPI is a measure of consumer price inflation produced to international standards and in line with European regulations. First published in 1997 as the Harmonised Index of Consumer Prices (HICP), the CPI is the inflation measure used in the Government’s target for inflation”.⁵¹ We include this inflation measure because it has become the most widely used to make real pay assessments in the UK economy, and when comparing to international standards.
- The Retail Prices Index (RPI) 12-month inflation rate. The ONS states that “The Retail Prices Index (RPI) does not meet the required standard for designation as a National Statistic”. However, it is still used in Government spending (including Government Bonds, and student loan repayment calculations), and the ONS goes on to state “we continue to publish the RPI, its subcomponents and RPI excluding mortgage interest payments (RPIX)”⁵². We will also include this inflation measure because this is the one that we have used in the past to calculate real pay.

5.2.11 When making the comparison for all the inflation measures we used the 12-month inflation rate for September of each year. This is to make it consistent with the yearly police pay settlements, which also take place in September.

equivalence’, where the rent paid for an equivalent house in the private sector is taken as a proxy for the costs faced by an owner-occupier. The UK Statistics Authority said that they believe the CPIH to be “the most comprehensive measure of price change across the economy as a whole and it has been our headline measure of inflation since March 2017”. Source:

<https://publications.parliament.uk/pa/ld201719/ldselect/ldconaf/246/24602.htm>

⁵¹ Source:

<https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/consumerpriceinflation/october2019>.

⁵² Source:

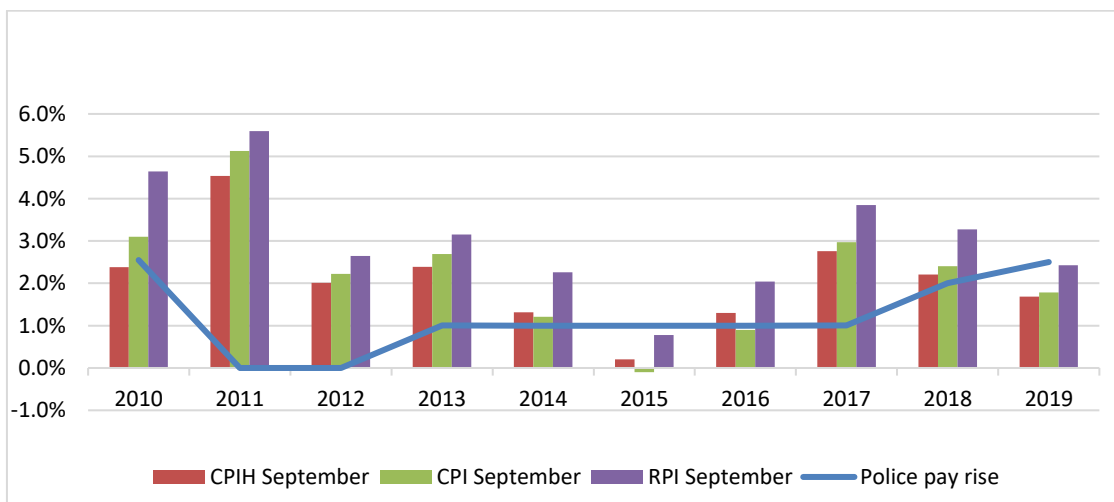
<https://www.ons.gov.uk/economy/inflationandpriceindices/bulletins/consumerpriceinflation/october2019>.

5.2.12 An explanatory note regarding the shortcomings of the RPI as a measure of inflation is provided at Annex G.

Impact on real pay

5.2.13 In general, even though nominal pay has risen, real pay for police officers has declined during the last decade. All the comparisons confirm this tendency, whichever inflation measure is used. They indicate a significant pattern of decline in real pay during the period 2009-2019 for all federated ranks and for the Superintending ranks. Figure 17 illustrates that in most years, police officer pay settlements remained lower in percentage terms to different inflation measures.

Figure 15: Police officers' pay settlements compared to CPIH, CPI, and RPI inflation, 2010-2019



5.2.14 Using all inflation measures available, CPIH, CPI and RPI, police payment settlements consistently have failed to keep up with inflation levels during the last ten years. Cumulative pay settlements for the police have totalled 12.1%, whereas cumulative CPIH has reached 20.8%, cumulative CPI 22.3%, and cumulative RPI 30.7%, meaning that overall there has been a shortfall of 8.7% against CPIH; 10.3% against CPI; and 18.6% against RPI. Meanwhile when we compare directly to pay settlements in the whole economy, officer pay has fallen 9.8% behind these.

5.2.15 Below, the impacts are detailed by rank. For each rank we have considered the starting point, and top of scale, and have calculated the real value using

2009 as the baseline, and the degree to which salaries have fallen behind inflation.

Constables

- 5.2.16 When using the CPIH Inflation rate, we see that the real terms value for Constables' full time pay on Pay Point 0 has dropped 8.5% overall between 2009 and 2019 (from £22,680 in September 2009 to £20,755 in September 2019). Constables' full-time real pay on the top of the scale has also experienced an overall reduction of 8.5% during the same period (from £35,610 in September 2009 to £32,585 in September 2019). This reduction is evident using all the three inflation measures: CIPH, CPI and RPI.
- 5.2.17 In fact, if we use the CPI Inflation rate, the real terms value for Constables' full-time basic pay on Pay Point 0 has come down by 9.9% between 2009 and 2019. From £22,680 in September 2009 to £20,433 in September 2019. At the top of the scale, the real terms value of Constables full-time basic pay has also come down by 9.9% from £35.610 in September 2009 to £32,078 in September 2019.
- 5.2.18 When applying the RPI Inflation rate to make the calculations, the reduction in Constables' real pay is even higher. The real terms value for Constables' full time pay on Pay Point 9 shows a reduction of 17.2 percent, coming down from £22,680 in September 2009 to £18,775 in September 2019. At the top of the scale, real pay also falls by 17.2 percent, from a real value of £35,610 in September 2009 to a real value of £29,476 in September 2019.
- 5.2.19 Notably data from the PFEW Pay and Morale survey shows that Constables were more likely to be dissatisfied with their basic pay (81%) than all other ranks.

Figure 16: Constables' Pay Point 0 Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 22,680	£ 22,680	£ 22,680
2010/11	£ 22,720	£ 22,556	£ 22,206
2011/12	£ 21,689	£ 21,401	£ 20,964
2012/13	£ 21,253	£ 20,924	£ 20,409
2013/14	£ 20,961	£ 20,574	£ 19,974
2014/15	£ 20,894	£ 20,529	£ 19,721
2015/16	£ 21,061	£ 20,755	£ 19,765
2016/17	£ 20,999	£ 20,776	£ 19,560
2017/18	£ 20,630	£ 20,368	£ 19,003
2018/19	£ 20,588	£ 20,287	£ 18,761
2019/20	£ 20,755	£ 20,433	£ 18,775

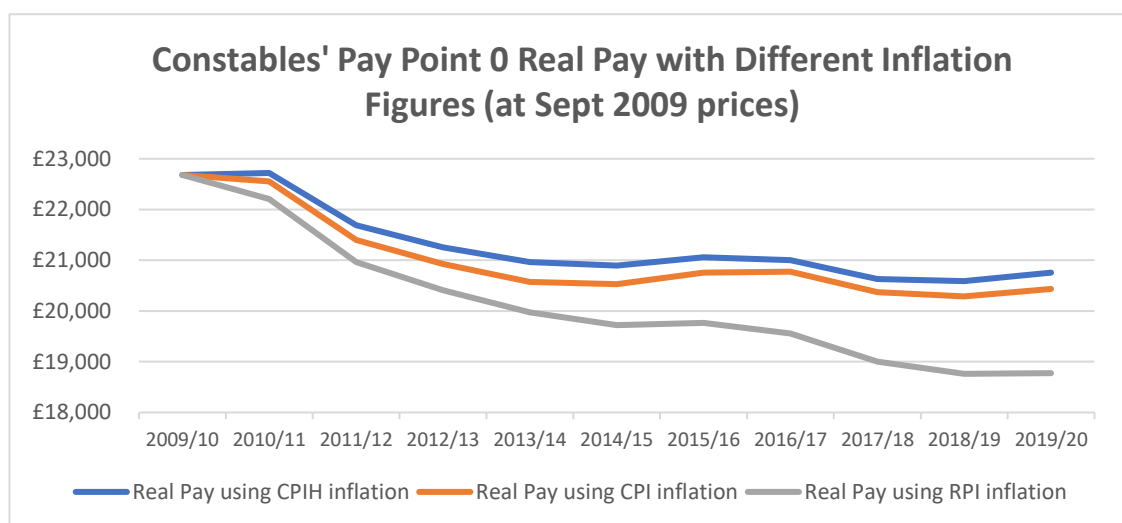
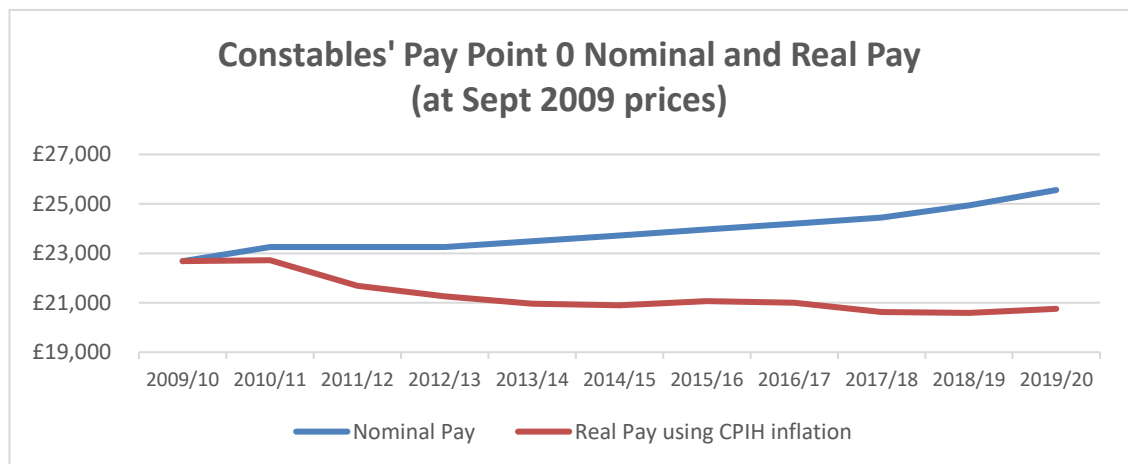
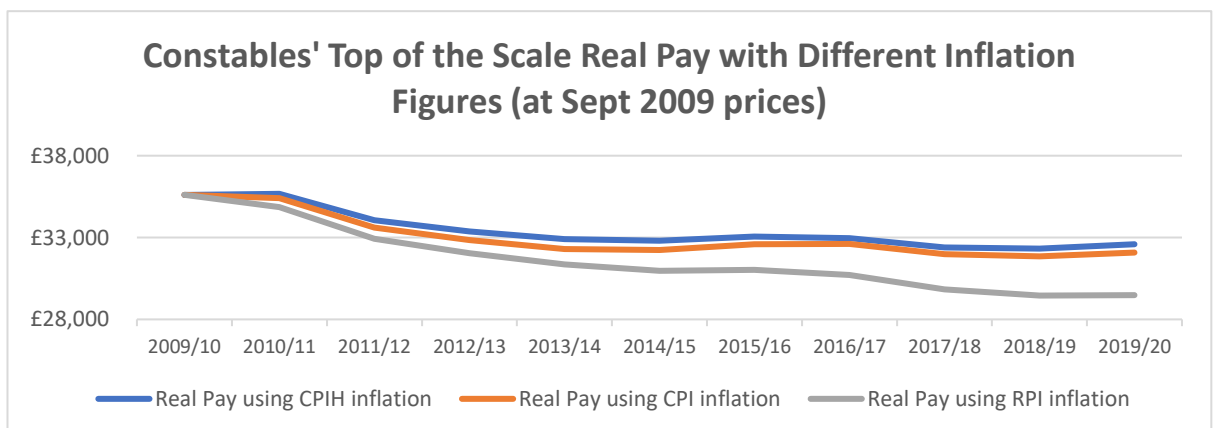
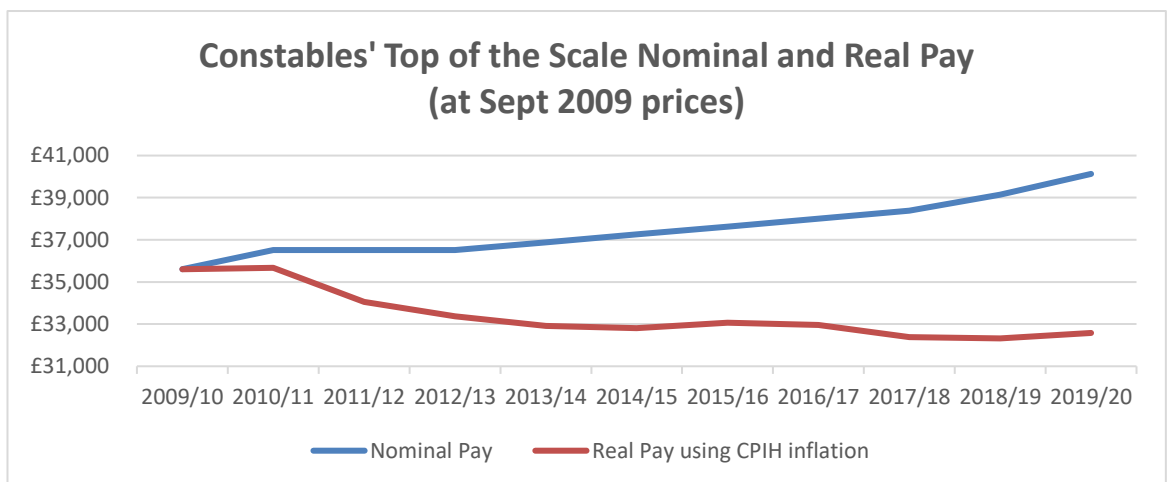


Figure 17: Constables' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 35,610	£ 35,610	£ 35,610
2010/11	£ 35,672	£ 35,415	£ 34,865
2011/12	£ 34,054	£ 33,601	£ 32,915
2012/13	£ 33,370	£ 32,854	£ 32,044
2013/14	£ 32,910	£ 32,301	£ 31,361
2014/15	£ 32,806	£ 32,233	£ 30,965
2015/16	£ 33,068	£ 32,587	£ 31,034
2016/17	£ 32,968	£ 32,620	£ 30,709
2017/18	£ 32,390	£ 31,979	£ 29,835
2018/19	£ 32,323	£ 31,851	£ 29,456
2019/20	£ 32,585	£ 32,078	£ 29,476



Sergeants

5.2.20 For Sergeants, nominal starting pay went up from £35,610 in 2009 to £41,500 in 2019, while nominal top of the scale pay increased from £40,020 to £45,098 during the same period. However, using all inflation measures, starting real pay fell between 2009 and 2019. It decreased by 5.3% (using CPIH inflation), by 6.8% (using CPI inflation), and by 14.3% (using RPI inflation). For the top of the scale, Sergeants' real pay decreased by 8.5% (using CPIH inflation), by 9.9% (using CPI inflation), and by 17.2% (using RPI inflation).

5.2.21 In real terms, using CPIH, Sergeants' starting salaries today have the same purchasing power as £33,709 in 2009.

Figure 18: Sergeants' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 35,610	£ 35,610	£ 35,610
2010/11	£ 35,672	£ 35,415	£ 34,865
2011/12	£ 34,054	£ 33,601	£ 32,915
2012/13	£ 33,370	£ 32,854	£ 32,044
2013/14	£ 32,910	£ 32,301	£ 31,361
2014/15	£ 33,936	£ 33,343	£ 32,041
2015/16	£ 34,206	£ 33,709	£ 32,111
2016/17	£ 34,105	£ 33,744	£ 31,778
2017/18	£ 33,505	£ 33,080	£ 30,872
2018/19	£ 33,438	£ 32,948	£ 30,480
2019/20	£ 33,709	£ 33,184	£ 30,502

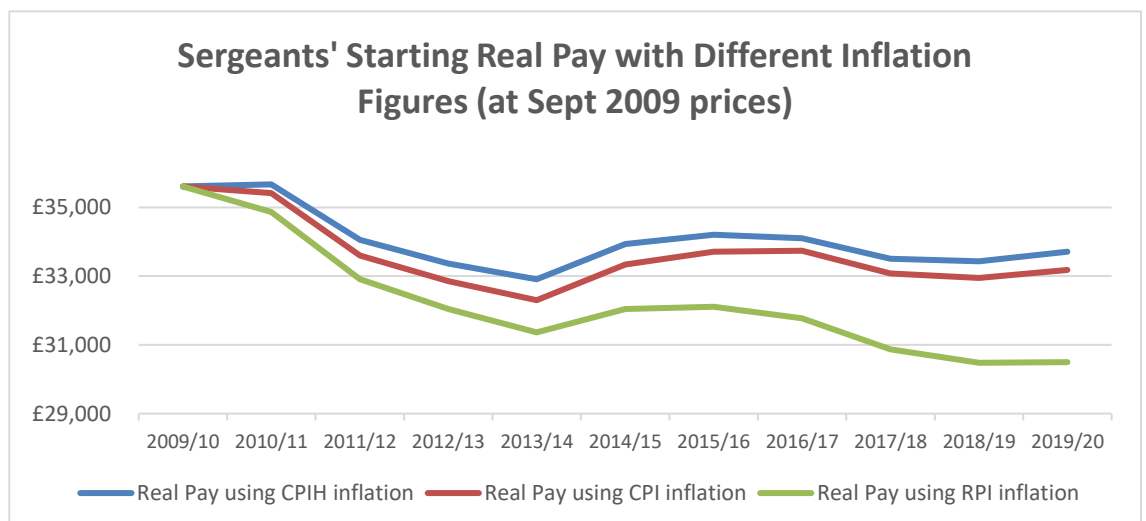
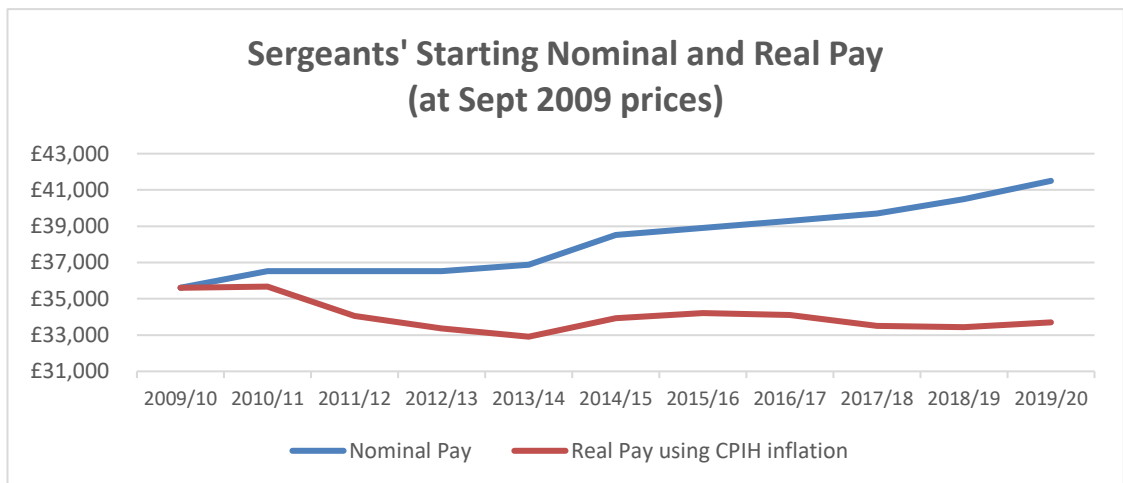
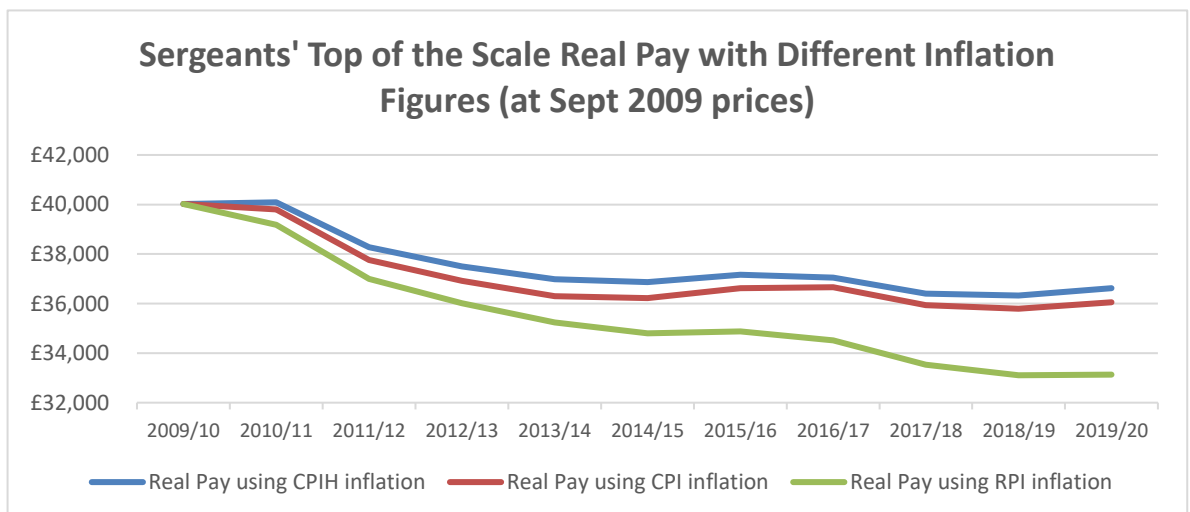
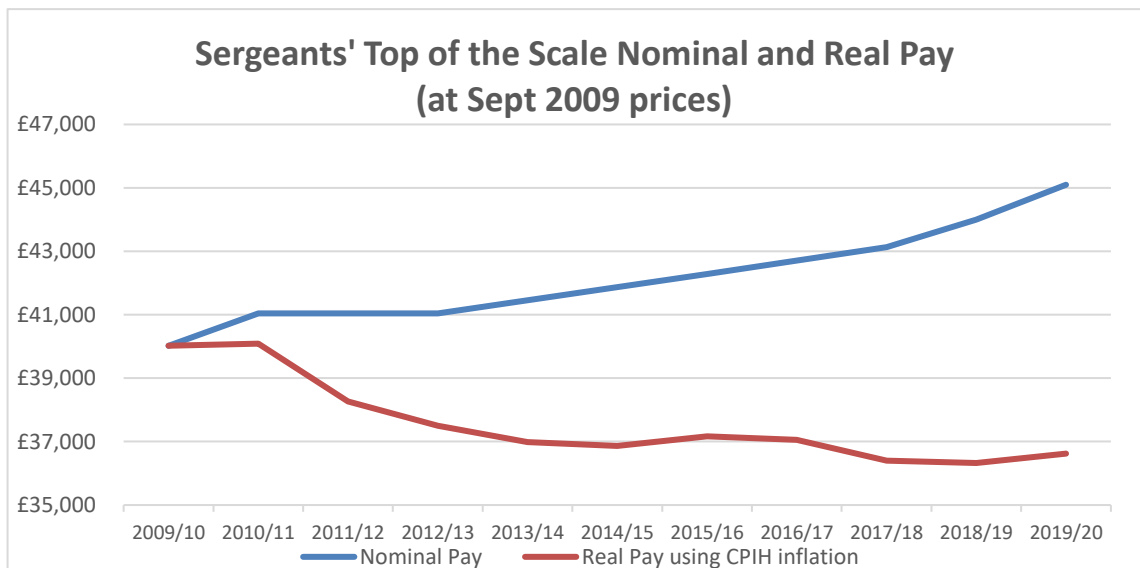


Figure 19: Sergeants' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 40,020	£ 40,020	£ 40,020
2010/11	£ 40,088	£ 39,799	£ 39,181
2011/12	£ 38,270	£ 37,761	£ 36,990
2012/13	£ 37,501	£ 36,921	£ 36,010
2013/14	£ 36,984	£ 36,300	£ 35,243
2014/15	£ 36,866	£ 36,221	£ 34,800
2015/16	£ 37,162	£ 36,620	£ 34,879
2016/17	£ 37,051	£ 36,658	£ 34,516
2017/18	£ 36,399	£ 35,936	£ 33,531
2018/19	£ 36,325	£ 35,792	£ 33,106
2019/20	£ 36,620	£ 36,049	£ 33,129



Inspectors and Chief Inspectors

5.2.22 For Inspectors and Chief Inspectors, the results are similar. Starting nominal pay for Inspectors increased from £45,624 to £51,414 between 2009 and 2019. While for Inspectors at the top of the scale, nominal pay went up from £49,488 up to £55,768. However, when looking at the figures in real terms, both starting and pay at the top of the scale for Inspectors, went down by 8.5 % (when using CPIH inflation), by 9.9 % (when using CPI inflation), and by 17.2 % (when using RPI inflation).

5.2.23 This year officers in all ranks were more likely than previously to say their pay and benefits had a negative effect on their morale. This proportion has increased by 4% for Constables and Sergeants, 5% for Inspectors, and 8% for Chief Inspectors.

Figure 20: Inspectors' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 45,624	£ 45,624	£ 45,624
2010/11	£ 45,703	£ 45,374	£ 44,669
2011/12	£ 43,630	£ 43,049	£ 42,171
2012/13	£ 42,753	£ 42,092	£ 41,054
2013/14	£ 42,161	£ 41,379	£ 40,170
2014/15	£ 42,028	£ 41,293	£ 39,664
2015/16	£ 42,364	£ 41,747	£ 39,753
2016/17	£ 42,239	£ 41,790	£ 39,339
2017/18	£ 41,495	£ 40,967	£ 38,217
2018/19	£ 41,411	£ 40,803	£ 37,732
2019/20	£ 41,747	£ 41,096	£ 37,758

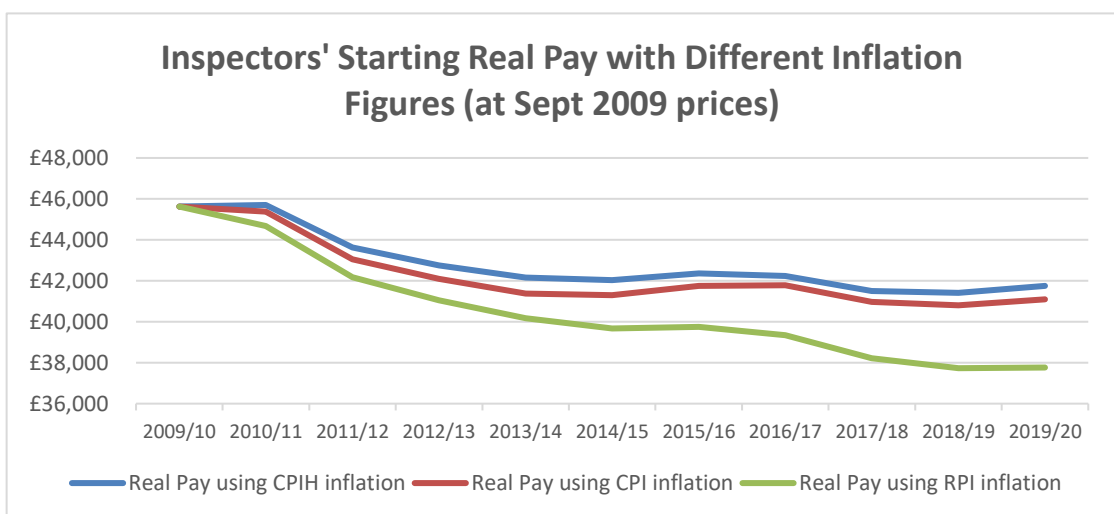
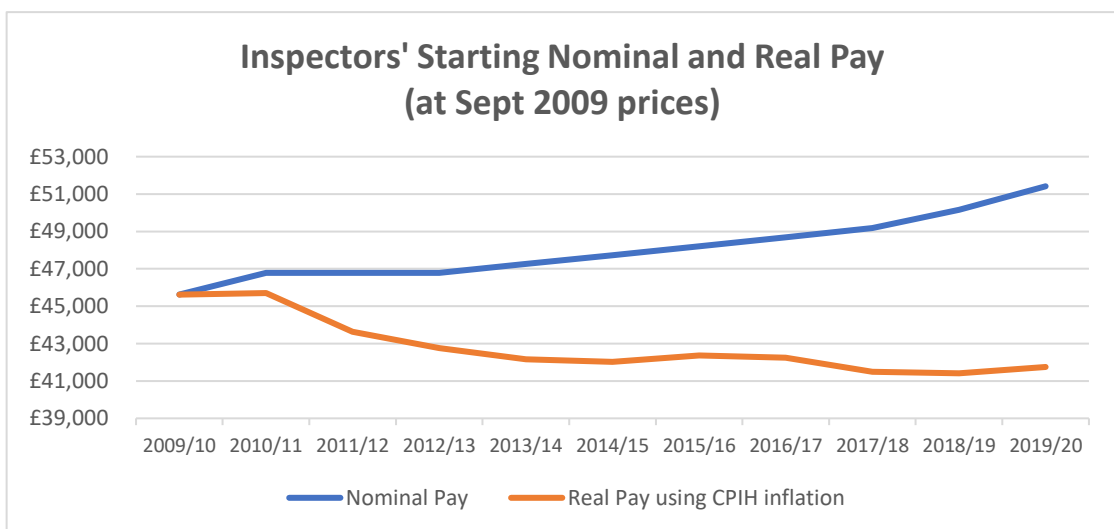
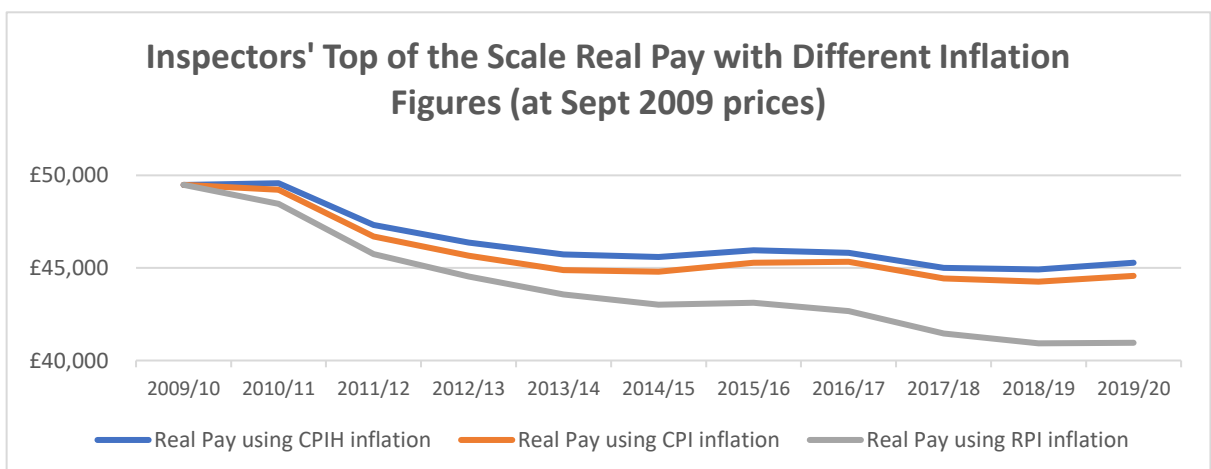
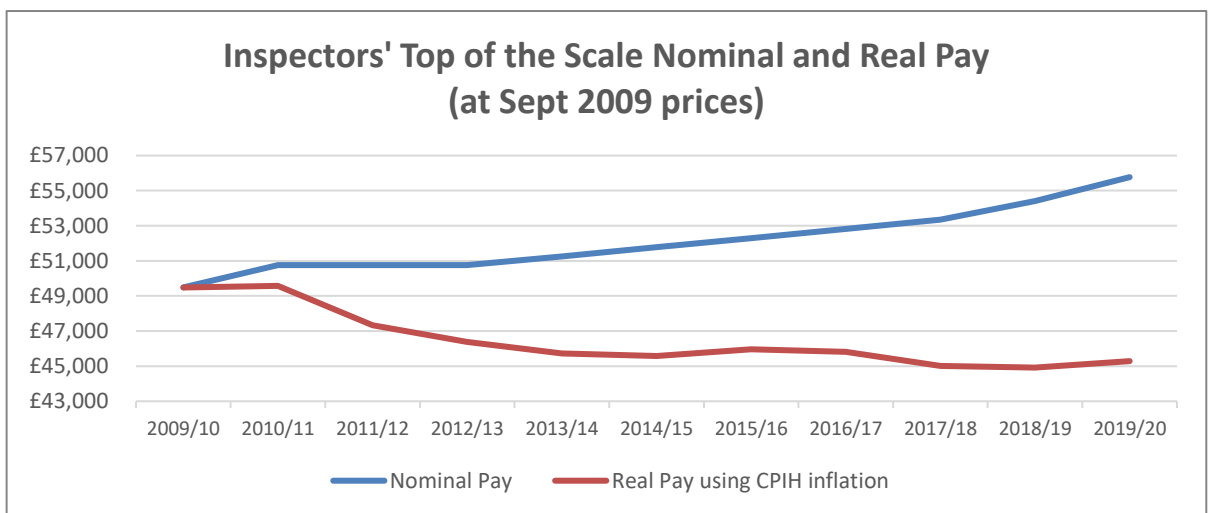


Figure 21: Inspectors' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 49,488	£ 49,488	£ 49,488
2010/11	£ 49,574	£ 49,217	£ 48,452
2011/12	£ 47,326	£ 46,696	£ 45,743
2012/13	£ 46,374	£ 45,657	£ 44,531
2013/14	£ 45,731	£ 44,883	£ 43,572
2014/15	£ 45,586	£ 44,789	£ 43,022
2015/16	£ 45,952	£ 45,282	£ 43,119
2016/17	£ 45,815	£ 45,328	£ 42,670
2017/18	£ 45,009	£ 44,436	£ 41,453
2018/19	£ 44,918	£ 44,258	£ 40,927
2019/20	£ 45,282	£ 44,576	£ 40,956



5.2.24 For Chief Inspectors, starting nominal pay went up from £50,502 in 2009 to £56,909 in 2019. Chief Inspectors' nominal pay at the top of the scale increased from £52,578 in 2009 to £59,249 in 2019. In real terms, both starting pay and pay at the top of the scale for Chief Inspectors decreased in the same percentages as real pay for Inspectors during the period under study.

Figure 22: Chief Inspectors' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 50,502	£ 50,502	£ 50,502
2010/11	£ 50,588	£ 50,223	£ 49,443
2011/12	£ 48,294	£ 47,651	£ 46,678
2012/13	£ 47,323	£ 46,591	£ 45,442
2013/14	£ 46,668	£ 45,802	£ 44,465
2014/15	£ 46,519	£ 45,705	£ 43,902
2015/16	£ 46,891	£ 46,207	£ 44,000
2016/17	£ 46,752	£ 46,255	£ 43,542
2017/18	£ 45,930	£ 45,346	£ 42,302
2018/19	£ 45,836	£ 45,164	£ 41,764
2019/20	£ 46,208	£ 45,488	£ 41,794

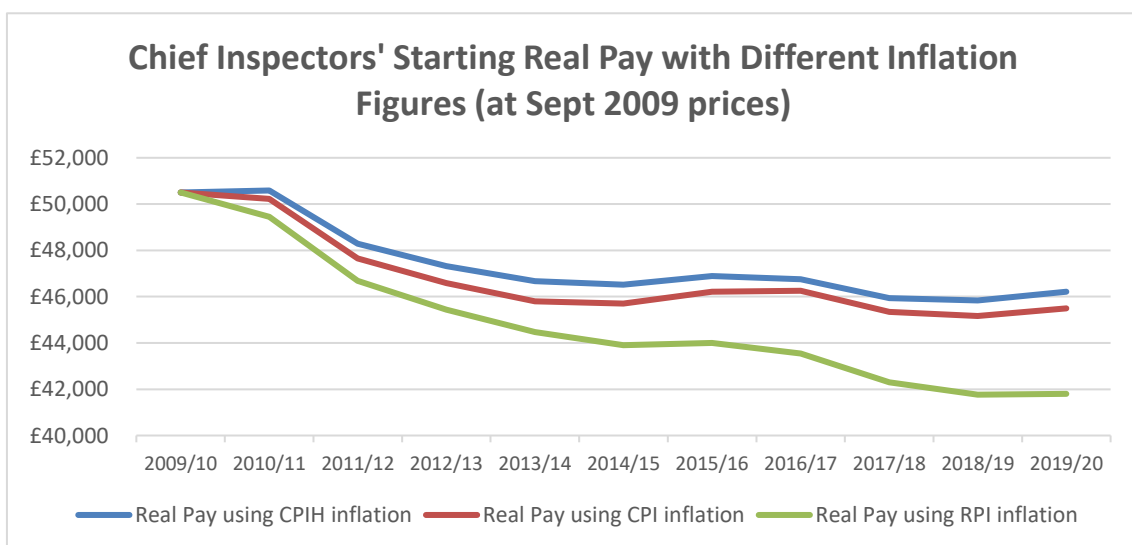
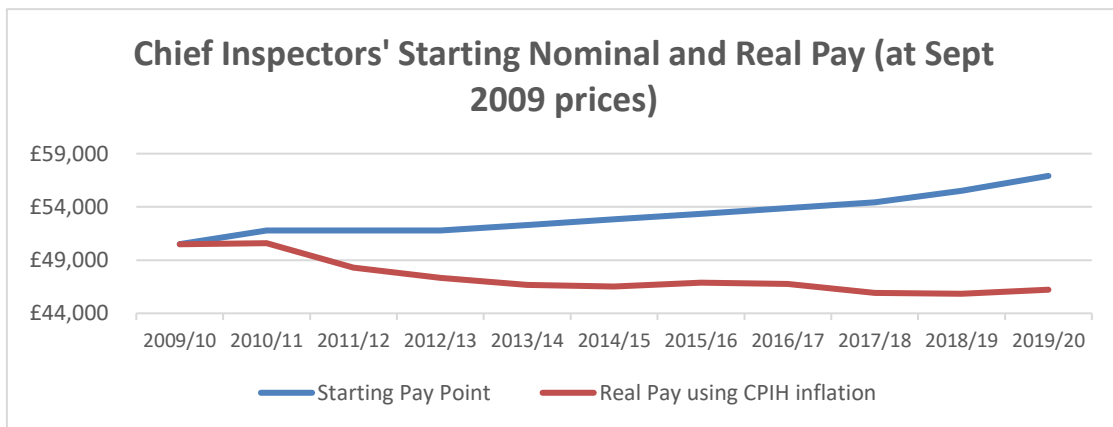
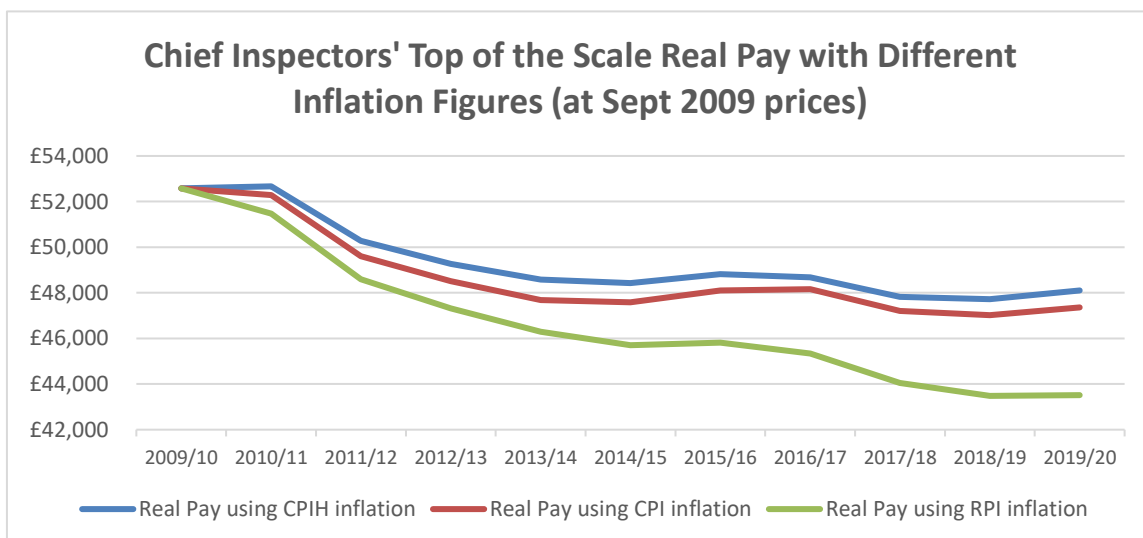
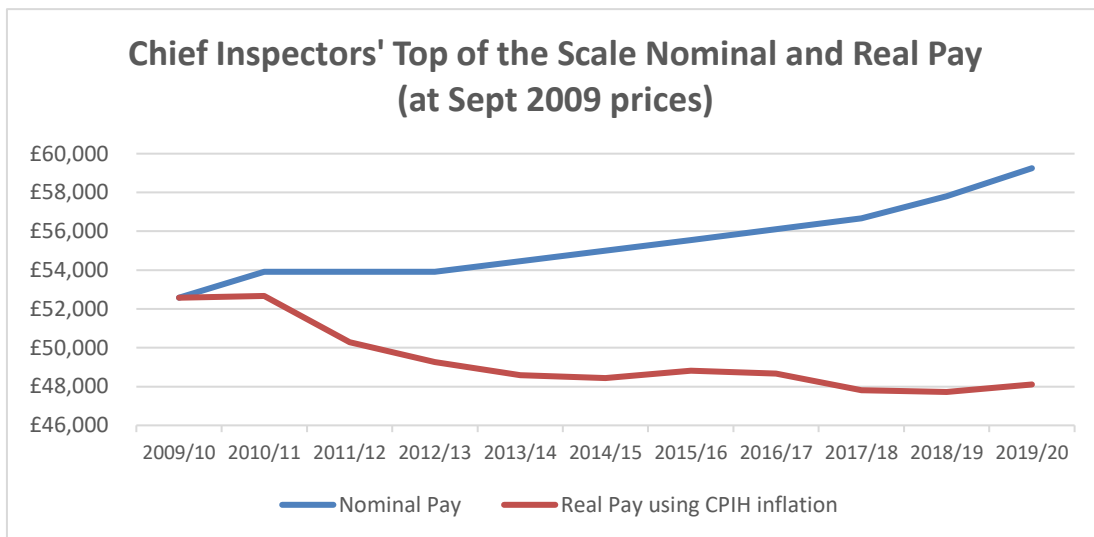


Figure 23: Chief Inspectors' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 52,578	£ 52,578	£ 52,578
2010/11	£ 52,667	£ 52,288	£ 51,476
2011/12	£ 50,279	£ 49,610	£ 48,597
2012/13	£ 49,268	£ 48,506	£ 47,310
2013/14	£ 48,586	£ 47,685	£ 46,292
2014/15	£ 48,431	£ 47,584	£ 45,707
2015/16	£ 48,818	£ 48,107	£ 45,809
2016/17	£ 48,673	£ 48,156	£ 45,332
2017/18	£ 47,818	£ 47,210	£ 44,041
2018/19	£ 47,721	£ 47,020	£ 43,481
2019/20	£ 48,108	£ 47,358	£ 43,512



Superintendents

5.2.25 The evolution of real pay is quite similar for Superintendents and Chief

Superintendents. Between 2009 and 2019, Superintendents starting nominal pay increased from £60,750 up to £68,459. While Superintendents' nominal pay at the top of the scale went up from £70,779 in 2009 to £80,860 in 2019. However, in real terms, Superintendents' starting and top of the scale pay decreased by 8.5 % (when using CPIH inflation rate), by 9.9 % (when using CPI inflation), and by 17.2 % (when using RPI inflation). Chief

Superintendents' nominal starting pay increased from £72,543 in 2009 up to £84,848 in 2019, while Chief Superintendents top of the scale pay went up from £76,680 to £89,510 during the same period. However, the real value of both, starting and top of the scale pay, decreased by 5 % (when using CPIH inflation), by 6.5 % (when using CPI inflation), and by 14 % (when using RPI inflation) during the same period.

Figure 24: Superintendents' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 60,750	£ 60,750	£ 60,750
2010/11	£ 60,853	£ 60,415	£ 59,476
2011/12	£ 58,093	£ 57,320	£ 56,150
2012/13	£ 56,925	£ 56,045	£ 54,663
2013/14	£ 56,137	£ 55,096	£ 53,487
2014/15	£ 55,960	£ 54,981	£ 52,812
2015/16	£ 56,408	£ 55,586	£ 52,931
2016/17	£ 56,240	£ 55,643	£ 52,380
2017/18	£ 55,251	£ 54,548	£ 50,886
2018/19	£ 55,139	£ 54,330	£ 50,240
2019/20	£ 55,587	£ 54,720	£ 50,276

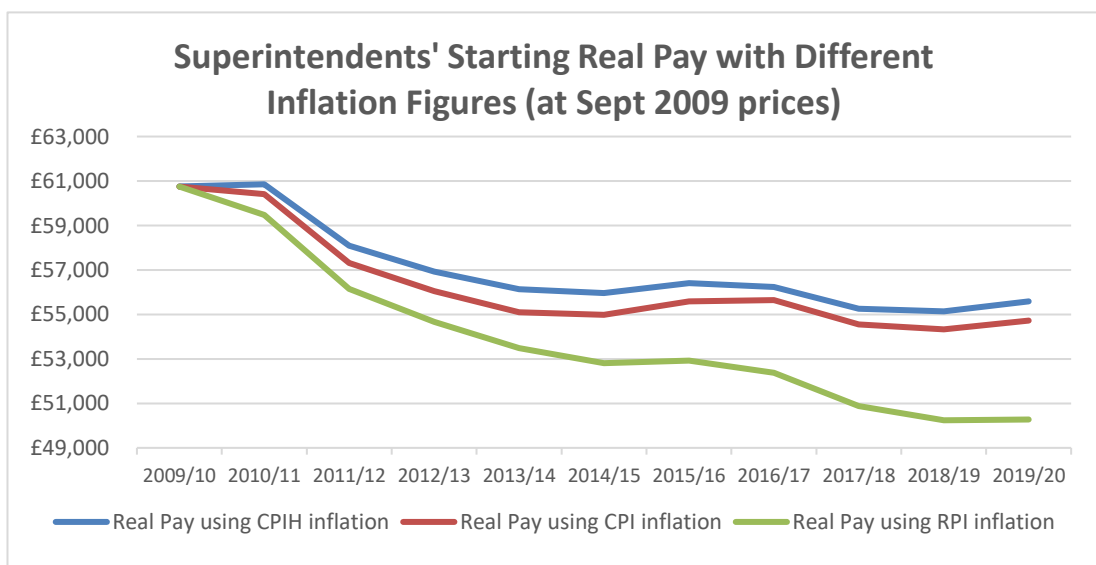
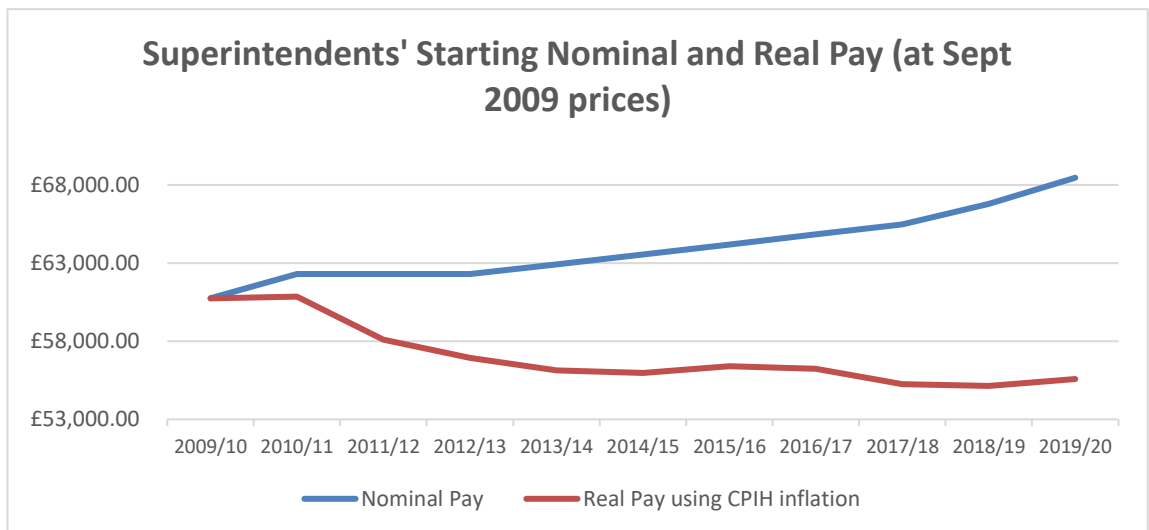


Figure 25: Superintendents' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 70,779	£ 70,779	£ 70,779
2010/11	£ 70,899	£ 70,388	£ 69,295
2011/12	£ 67,684	£ 66,783	£ 65,420
2012/13	£ 66,323	£ 65,297	£ 63,687
2013/14	£ 65,405	£ 64,192	£ 62,317
2014/15	£ 65,198	£ 64,057	£ 61,531
2015/16	£ 65,720	£ 64,762	£ 61,669
2016/17	£ 65,525	£ 64,828	£ 61,027
2017/18	£ 64,372	£ 63,553	£ 59,287
2018/19	£ 64,242	£ 63,299	£ 58,534
2019/20	£ 64,763	£ 63,753	£ 58,576

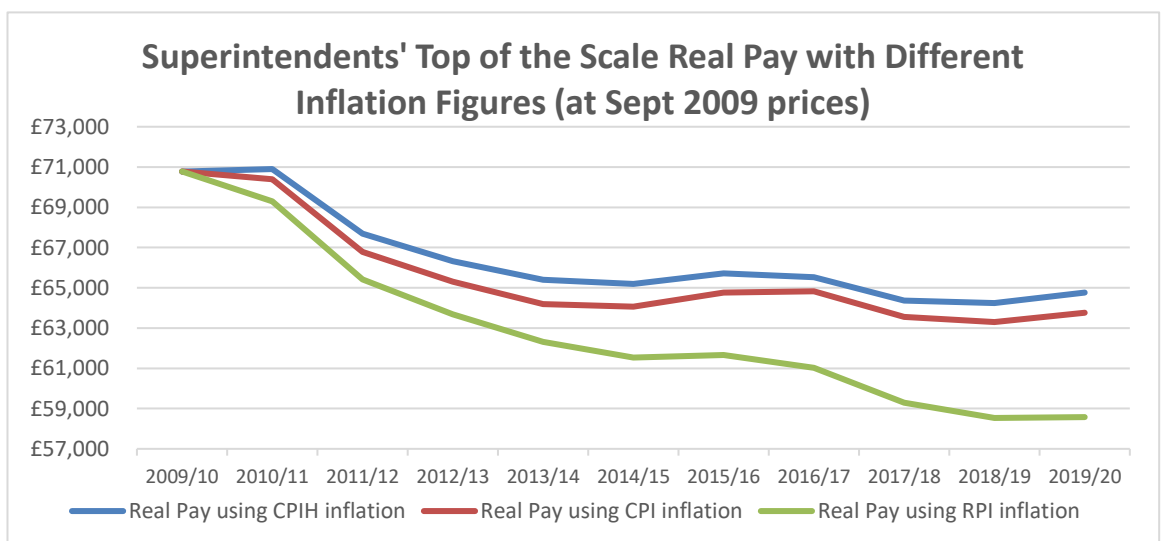
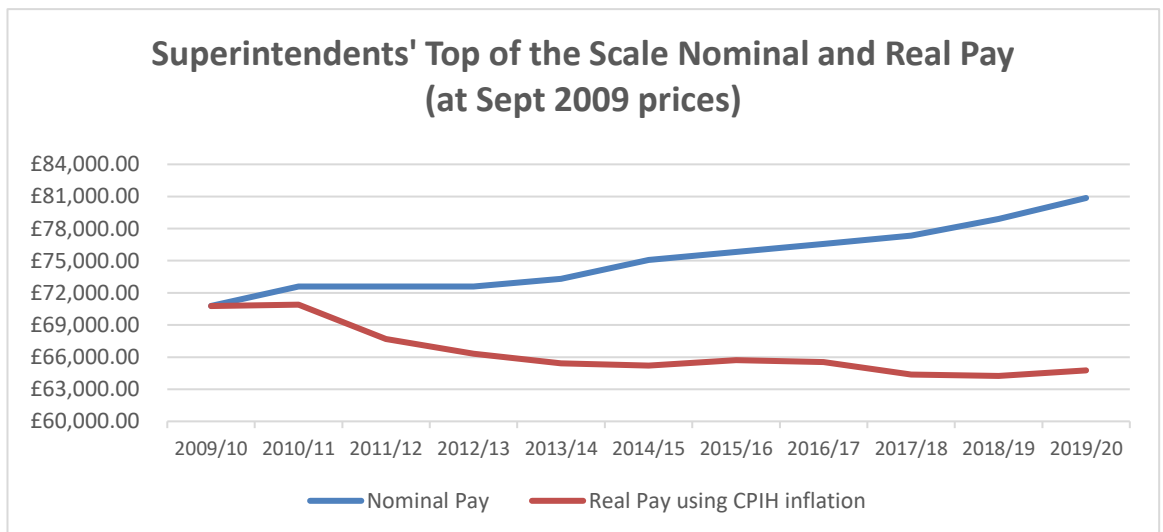


Figure 26: Chief Superintendents' Starting Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

Year	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 72,543	£ 72,543	£ 72,543
2010/11	£ 72,669	£ 72,145	£ 71,025
2011/12	£ 69,373	£ 68,450	£ 67,053
2012/13	£ 67,978	£ 66,927	£ 65,277
2013/14	£ 67,036	£ 65,793	£ 63,871
2014/15	£ 69,392	£ 68,175	£ 65,512
2015/16	£ 69,948	£ 68,926	£ 65,659
2016/17	£ 69,739	£ 68,995	£ 64,975
2017/18	£ 68,513	£ 67,638	£ 63,123
2018/19	£ 68,373	£ 67,367	£ 62,321
2019/20	£ 68,928	£ 67,850	£ 62,365

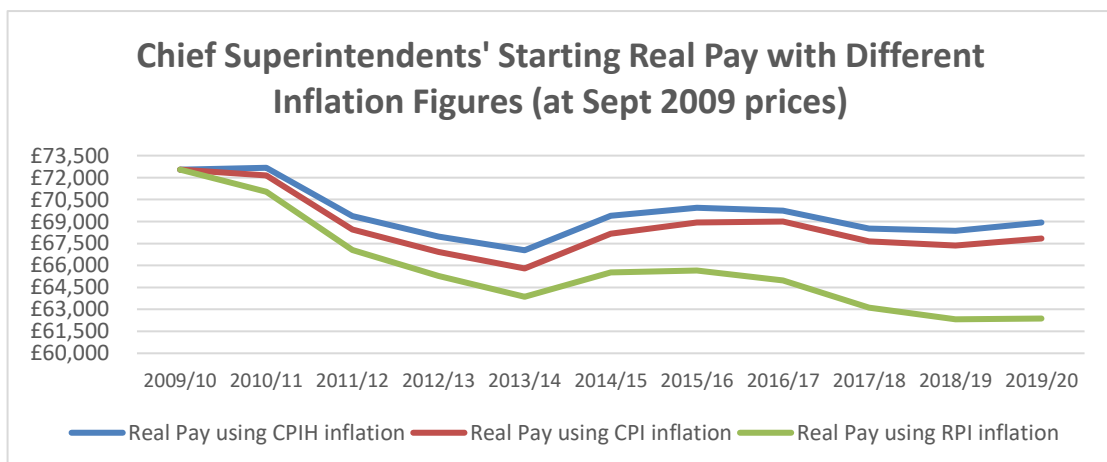
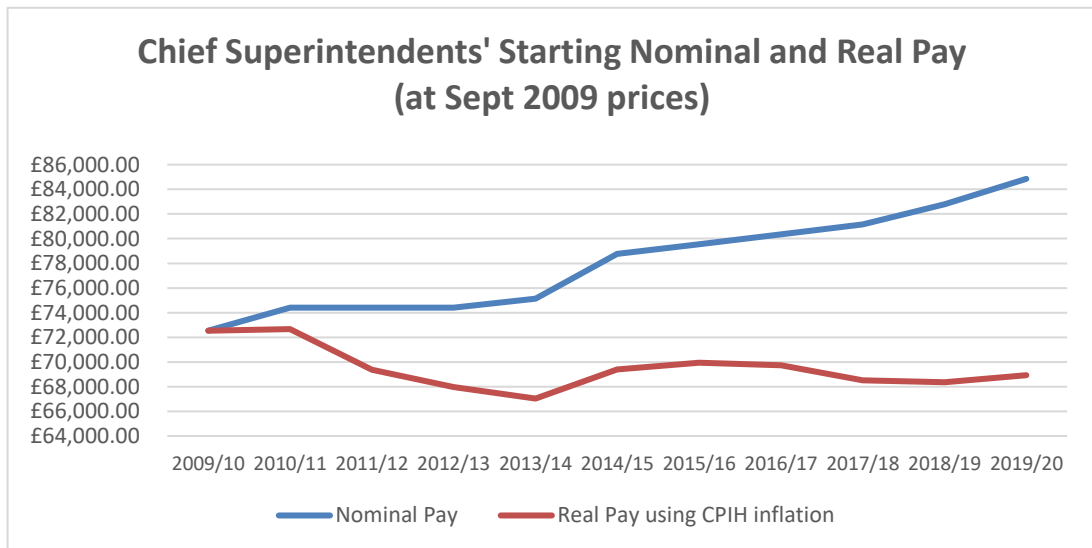
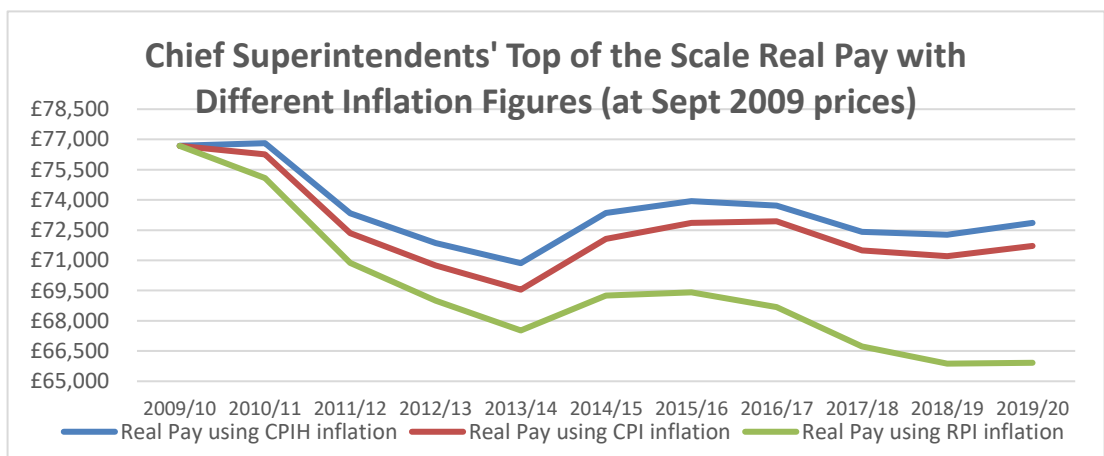
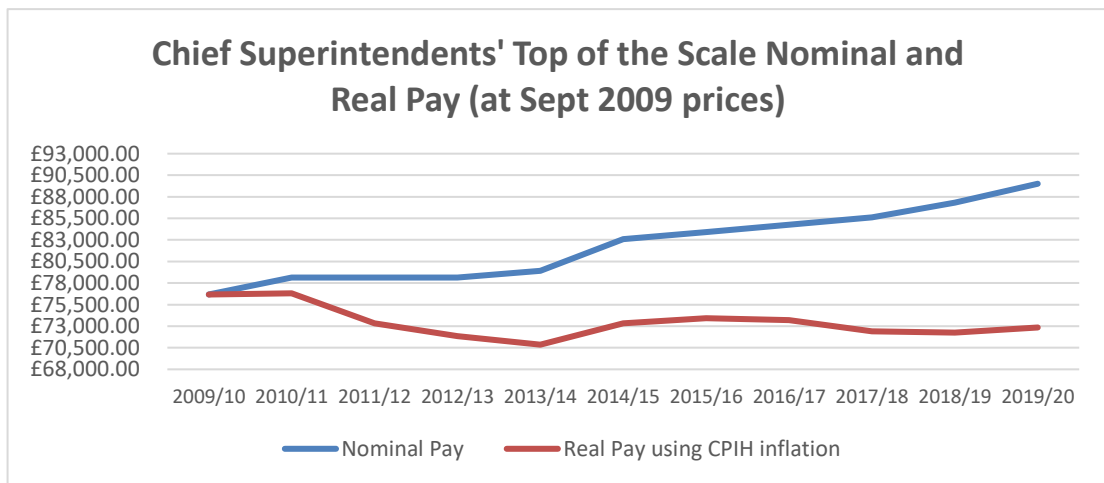


Figure 27: Chief Superintendents' Top of the Scale Real Pay with Different Inflation Figures (at Sept 2009 prices); and nominal and real pay graphs

	Real Pay using CPIH inflation	Real Pay using CPI inflation	Real Pay using RPI inflation
2009/10	£ 76,680	£ 76,680	£ 76,680
2010/11	£ 76,813	£ 76,260	£ 75,075
2011/12	£ 73,329	£ 72,353	£ 70,876
2012/13	£ 71,855	£ 70,744	£ 68,999
2013/14	£ 70,859	£ 69,545	£ 67,514
2014/15	£ 73,349	£ 72,063	£ 69,248
2015/16	£ 73,937	£ 72,856	£ 69,404
2016/17	£ 73,717	£ 72,930	£ 68,680
2017/18	£ 72,421	£ 71,496	£ 66,723
2018/19	£ 72,272	£ 71,209	£ 65,875
2019/20	£ 72,858	£ 71,720	£ 65,922



Cost of living

5.2.26 Given the decrease in real terms pay, the following figures taken from our Pay and Morale survey, are unsurprising.

- 74% of respondents said that they felt financially worse off now compared to five years ago.
- 15% of all respondents reported that they never or almost never have enough money to cover their monthly essentials.
- 50% of respondents indicated that they worried about the state of their personal finances every day or almost every day, compared to 45% in 2018.
- 65% of respondents said that on their current salary they did not think they would be able to get a mortgage, with a further 5% unsure.
- 17% of respondents had had to seek advice about money issues in the last year.
- Constables were most likely to say that the cost of living in their force area was expensive or very expensive at 77%.
- Sergeants were most likely to say that they feel worse off than they did five years ago (81%).
- Regardless of region, at least 50% of respondents said that the cost of living in their area was either expensive or very expensive.
- Respondents in London in particular were most likely to report feeling worse off than they did five years ago (81%), with respondents in Eastern England and the North East least likely to report feeling worse off than they did five years ago (70%).
- Respondents with between 3 and 5 years' service were most likely to say that they can either never or almost never afford all of their essentials; reported by around one in five (20%) respondents in this group.

5.2.27 The following quotes reinforce the findings:

Officer quote: "I find myself worrying daily over money and 'getting by' each month. Although I have enough for bills it is still tight. I have been a police

officer for 5 1/2 years and did not expect at a young age that I would be struggling with my health and morale. I am now doing 12hr shifts and am constantly tired which is affecting home life and the general feeling of being run down and ill.”(Constable, 6 years’ service.)

Officer quote: “Due to the change in my pension I am paying a lot more to receive a lot less. My interest only mortgage was based on my lump sum paying off the mortgage. I am now at least £20,000 short now I have been forced to move to the new scheme (and just missing out on staying in the old scheme). I was the first intake without Housing Allowance in September 1994 and our pay and conditions have been systematically eroded ever since, despite promises they couldn’t be touched.” (Sergeant, 25 years’ service).

Recruitment

5.2.28 We are extremely pleased by the July 2019 Government’s announcement of its intention to recruit 20,000 new police officers during the next 3 years. From the end of 2020 to 2021 the Home Office is providing £750 million for the recruitment of up to 6,000 additional officers as the first stage of this new uplift, plus an immediate £45 million to kick-start recruitment. It is reassuring that money is available, but it must be spent wisely. The numbers of recruits needed combined with the lowering of the starting salary over the last few years means the service is unlikely to attract the numbers required. We are convinced that the new police officer recruitment targets demand an overhaul of police officers’ entry pay. We firmly believe that for this policy change to be successful and to be able to attract the desired number of new recruits a change on the previous route of keeping police officers rises below the inflation rate must be achieved. And given the losses on police officers’ real wages during the last decade, subsequent pay rises must be looking to compensate for these previous losses.

Police Constable Degree Apprentice Pay: Pay Point -1.

5.2.29 The PCDA scheme started in 2018 with a minimum pay of £18,000. If we include the PCDA pay in the analysis, we can make a comparison of the bottom starting salary in 2009. As shown above, if pay at the bottom of the scale in 2009 (£22,680) had increased to keep up with the inflation rate (CPIH), that is, if nominal pay in 2009 had increased by the same percentage as the inflation rate on each year between 2009 and 2019, it would have reached the value of £27,380 in 2018 and £27,843 in 2019. As a result, the starting PCDA minimum pay of £18,000 has around 34 percent (£9,380, in 2018) and 35 percent (£9,843, in 2019) lower purchasing power compared to the inflation corrected minimum nominal pay of 2009. The PCDA current minimum of £18,450 has 34% (£9,393 in 2019) lower purchasing power than the inflation corrected minimum nominal pay of 2009.

5.2.30 When applying CPI and RPI to the estimations, the difference between the PCDA starting pay as set in 2018 and the nominal pay corrected by inflation is even higher. Using CPI, the difference between the PCDA pay and the nominal corrected pay in 2018 and 2019 is 35% and 36% respectively. Using the RPI, the difference reaches 40% and 41% respectively.

Figure 28: Comparison between the Apprenticeship Pay of £18,000 and Actual Nominal Pay from 2009 when corrected by Inflation (CPIH)

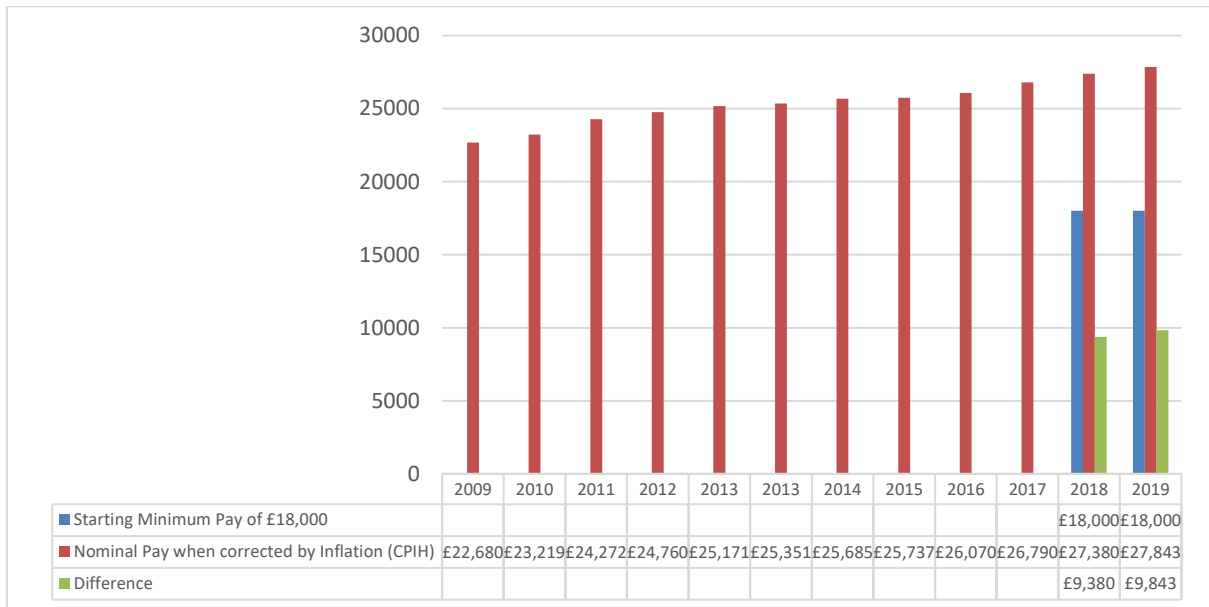


Figure 29: Comparison between the Apprenticeship Pay of £18,000 and Actual Nominal Pay from 2009 when corrected by Inflation (CPI)

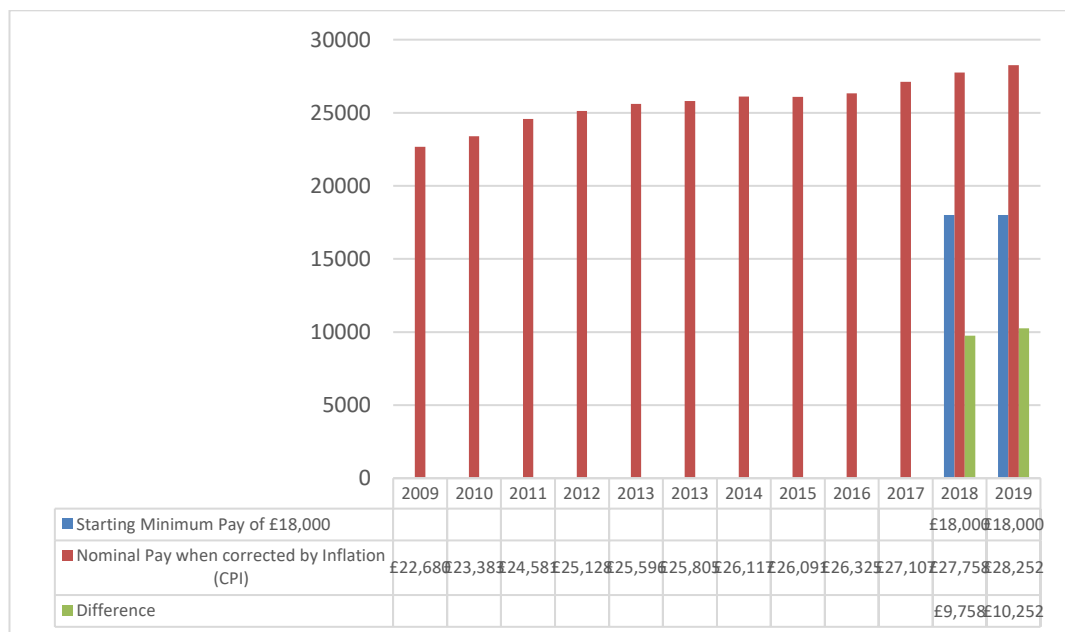
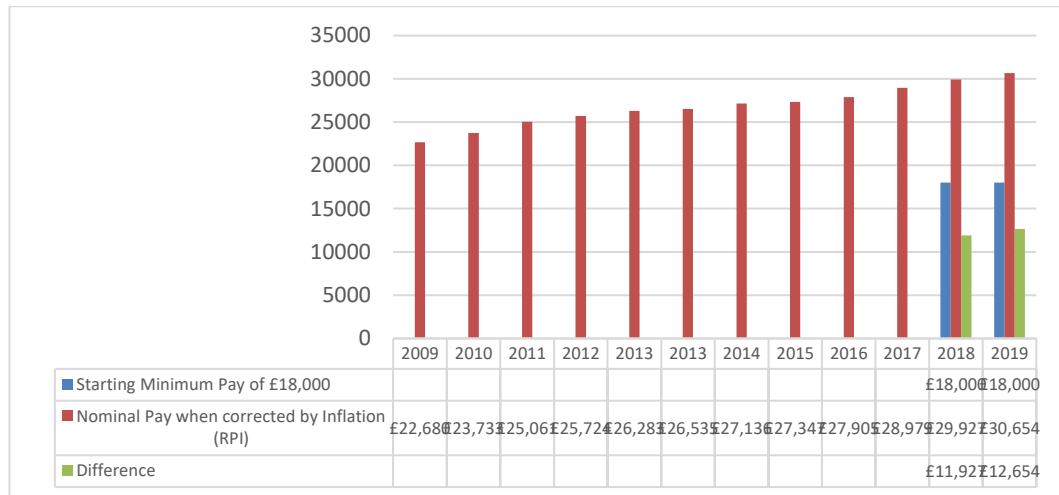


Figure 30: Comparison between the Apprenticeship Pay of £18,000 and Actual Nominal Pay from 2009 when corrected by Inflation (RPI)



5.2.31 We believe both pay point -1 and 0 (£18,450 and £20,880) should be erased. If they are not, then we are concerned that forces will try to recruit on £18,450 or thereabouts, and that this will have two significant impacts.

- First, only very young officers (aged 18, or close to that) will join. This will desperately impact on the service's ability to be representative of the public served, and will undoubtedly impact on the ability of new recruits to have the life skills required in policing.
- Second, we do not believe that adequate numbers of people will be attracted by an £18,450 salary to recruit 53,000 new officers.

5.2.32 Notably the need to set starting salaries that are attractive is being recognised in other parts of the public sector. For example, the Education Secretary has announced an intention to increase new teachers' starting pay to £30,000 by 2022-2023.⁵³

Recommendation 16: Remove pay points -1 and 0: set minimum starting salary £24,177

5.2.33 **Recommendation 15:** We therefore believe that the minimum starting salary must be set as pay point 1, (£24,177).

⁵³ News story: £30,000 starting salaries proposed for teachers, 2 September 2019. <https://www.gov.uk/government/news/30000-starting-salaries-proposed-for-teachers>

Retention

5.2.34 As noted, we believe around 61% of officers are at the top of their pay scale.

We believe that it is essential that these officers get a pay increase that is sufficient to retain them, especially in the current context.

Conclusion

5.2.35 Last year, when asked to suggest a 3 year deal, we sought for all officers to be given increases that would allow them to regain some of the losses vis a vis inflation over the previous 9-10 years. We therefore asked for officers to be awarded 5% for each of 3 years, or 6.2% should only a 1 year deal be available.

5.2.36 This year it is our understanding that the NPCC have not prepared a 3 year offer. Therefore we will also propose a single year deal. We will return to the scale of that recommendation after discussing the funding settlement and affordability. However, the analysis above serves to reinforce the evidence provided in previous years, demonstrating officers' loss of earning compared to every possible inflationary measure, be that average pay increases, CPI, CPIH, or RPI.

5.3 Affordability

5.3.1 In considering our recommendation for the pay uplift, we have taken into account the funding settlement announced on 22nd January 2020.

5.3.2 The funding settlement is shown on the following page, Table 5. We have used the Home Office data provided,⁵⁴ and calculated the settlement compared to CPIH, to demonstrate that this is a real terms increase for every force. Due to the funding formula, which means a different proportion of the overall funding comes from the precept in each force, the percentage real

⁵⁴ Police Grant (England and Wales), Police Grant Report 2020/2021; 22nd January 2020
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/860046/CCS0120839654-001_The_Police_Grant_Report_England_and_Wales-2020-21_Web_Accessible.pdf

terms increase differs by force. It ranges from 5.4% in Surrey, to 8.3% in the City of London.

5.3.3 As last year, we have also calculated the costs of our recommended pay uplift and checked this against the force budgets to assess affordability. To do so, we have subtracted the ringfenced grant for the 20,000 uplift and used the existing number of officers to calculate the pay bill. That is, in order to isolate and remove the numbers uplift and associated funding from the calculation and present an accurate assessment we have simply subtracted the ringfenced uplift and we have not added the additional 20,000 officers. These data are in Table 6.

5.3.4 The data in Table 6 demonstrate that every force could afford an uplift of 5%. We understand that there are other pressures on spending too: but officers are the lifeblood of the service and it is essential that remuneration is adequate to maintain sufficient numbers of motivated and qualified officers. Even were an uplift of 5% to be awarded, we believe overall forces would still have £681.5m from this years' funding uplift left for other expenditure.

Table 7: Home Office Provisional 2020-2021 Settlement: Impact With CPIH Calculated

	2019/20	2020/21	Cash increase from 2019/20	% cash increase	CPIH 2019 DEC	Diff. actual increase & CPIH	Cumulative real terms value increase using CPIH	Real terms cash increase
	£m	£m	£m		1.4%		£m	£m
Avon & Somerset	£ 303.2	£ 326.6	£ 23.4	7.7%	1.4%	6.3%	£ 322.4	£ 19.2
Bedfordshire	£ 112.9	£ 121.9	£ 9.0	8.0%	1.4%	6.6%	£ 120.3	£ 7.4
Cambridgeshire	£ 144.7	£ 155.7	£ 11.0	7.6%	1.4%	6.2%	£ 153.7	£ 9.0
Cheshire	£ 192.3	£ 207.6	£ 15.3	8.0%	1.4%	6.6%	£ 204.9	£ 12.6
City of London	£ 61.0	£ 66.9	£ 5.9	9.7%	1.4%	8.3%	£ 66.0	£ 5.0
Cleveland	£ 132.7	£ 143.1	£ 10.5	7.9%	1.4%	6.5%	£ 141.3	£ 8.6
Cumbria	£ 109.8	£ 118.0	£ 8.2	7.5%	1.4%	6.1%	£ 116.5	£ 6.7
Derbyshire	£ 179.5	£ 193.5	£ 14.0	7.8%	1.4%	6.4%	£ 191.0	£ 11.5
Devon & Cornwall	£ 314.0	£ 338.3	£ 24.3	7.7%	1.4%	6.3%	£ 333.9	£ 19.9
Dorset	£ 135.1	£ 144.7	£ 9.6	7.1%	1.4%	5.7%	£ 142.8	£ 7.7
Durham	£ 123.0	£ 133.1	£ 10.1	8.2%	1.4%	6.8%	£ 131.4	£ 8.4
Dyfed-Powys	£ 106.9	£ 114.5	£ 7.6	7.1%	1.4%	5.7%	£ 113.0	£ 6.1
Essex	£ 298.9	£ 322.8	£ 23.8	8.0%	1.4%	6.6%	£ 318.5	£ 19.6
Gloucestershire	£ 119.2	£ 127.7	£ 8.4	7.0%	1.4%	5.6%	£ 125.9	£ 6.7
Greater Manchester	£ 591.8	£ 641.9	£ 50.0	8.4%	1.4%	7.0%	£ 633.5	£ 41.7
Gwent	£ 130.4	£ 140.2	£ 9.8	7.5%	1.4%	6.1%	£ 138.4	£ 8.0
Hampshire	£ 339.2	£ 366.2	£ 27.0	8.0%	1.4%	6.6%	£ 361.5	£ 22.3
Hertfordshire	£ 204.8	£ 221.1	£ 16.3	8.0%	1.4%	6.6%	£ 218.2	£ 13.4
Humberside	£ 187.0	£ 201.8	£ 14.8	7.9%	1.4%	6.5%	£ 199.2	£ 12.2
Kent	£ 312.6	£ 337.7	£ 25.2	8.1%	1.4%	6.7%	£ 333.4	£ 20.8
Lancashire	£ 285.1	£ 308.5	£ 23.4	8.2%	1.4%	6.8%	£ 304.5	£ 19.4
Leicestershire	£ 188.6	£ 203.2	£ 14.6	7.7%	1.4%	6.3%	£ 200.6	£ 12.0
Lincolnshire	£ 122.5	£ 131.4	£ 8.9	7.3%	1.4%	5.9%	£ 129.7	£ 7.2
Merseyside	£ 331.0	£ 359.0	£ 28.1	8.5%	1.4%	7.1%	£ 354.5	£ 23.5
Greater London Authority	£ 2,734.5	£ 2,934.8	£ 200.3	7.3%	1.4%	5.9%	£ 2,896.5	£ 162.0
Norfolk	£ 165.1	£ 177.0	£ 11.8	7.1%	1.4%	5.7%	£ 174.6	£ 9.5
North Wales	£ 155.8	£ 166.6	£ 10.8	6.9%	1.4%	5.5%	£ 164.4	£ 8.6
North Yorkshire	£ 155.5	£ 166.4	£ 10.9	7.0%	1.4%	5.6%	£ 164.2	£ 8.7
Northamptonshire	£ 135.9	£ 145.8	£ 10.0	7.4%	1.4%	6.0%	£ 144.0	£ 8.1
Northumbria	£ 283.3	£ 309.6	£ 26.2	9.2%	1.4%	7.8%	£ 305.5	£ 22.2
Nottinghamshire	£ 208.2	£ 224.8	£ 16.6	8.0%	1.4%	6.6%	£ 221.9	£ 13.7
South Wales	£ 290.3	£ 312.1	£ 21.8	7.5%	1.4%	6.1%	£ 308.0	£ 17.7
South Yorkshire	£ 261.8	£ 284.0	£ 22.2	8.5%	1.4%	7.1%	£ 280.3	£ 18.5
Staffordshire	£ 196.0	£ 211.0	£ 15.1	7.7%	1.4%	6.3%	£ 208.4	£ 12.4
Suffolk	£ 125.2	£ 134.8	£ 9.6	7.7%	1.4%	6.3%	£ 133.0	£ 7.8
Surrey	£ 233.7	£ 249.6	£ 15.9	6.8%	1.4%	5.4%	£ 246.3	£ 12.6
Sussex	£ 286.9	£ 309.9	£ 22.9	8.0%	1.4%	6.6%	£ 305.8	£ 18.9
Thames Valley	£ 422.7	£ 455.7	£ 33.0	7.8%	1.4%	6.4%	£ 449.8	£ 27.1
Warwickshire	£ 102.1	£ 109.6	£ 7.5	7.3%	1.4%	5.9%	£ 108.2	£ 6.1
West Mercia	£ 220.0	£ 236.6	£ 16.6	7.5%	1.4%	6.1%	£ 233.5	£ 13.5
West Midlands	£ 568.8	£ 620.2	£ 51.4	9.0%	1.4%	7.6%	£ 612.2	£ 43.4
West Yorkshire	£ 446.7	£ 484.7	£ 38.1	8.5%	1.4%	7.1%	£ 478.5	£ 31.8
Wiltshire	£ 118.5	£ 127.7	£ 9.1	7.7%	1.4%	6.3%	£ 125.9	£ 7.4
Total	£12,137.3	£13,086.7	£ 949.3	7.8%	1.4%	6.4%	£ 12,916.7	£ 779.4

* Total resource funding consists of core grant funding, National and International Capital City (NICC) grants, Legacy Council Tax grants, Precept grant, Pensions grant, ringfenced grant and police precept. 2020/21 precept figures are calculated by assuming that PCCs in England set the council tax referendum limit to £10 for a typical (Band D) property, and Office for Budget Responsibility forecast tax base increases.

Table 8: Table Showing Forces' Ability to Afford Recommended Uplift

	Cash increase from 2019/20	Number of officers each force	2019 Average salary of Police Officers	Approx paybill (No. Officers x Avg salary)	Average salary of Police Officers plus 5% uplift	Approx paybill including 5% uplift	Cost of 5% uplift (£m)	New money minus uplift cost
	£m		£	£m	£	£m	£m	£m
Avon & Somerset	£ 23.4	2,676	£ 40,870	£ 109.4	£ 42,913.3	£ 114.8	£ 5.5	£ 17.9
Bedfordshire	£ 9.0	1,164	£ 41,387	£ 48.2	£ 43,456.8	£ 50.6	£ 2.4	£ 6.6
Cambridgeshire	£ 11.0	1,447	£ 40,735	£ 58.9	£ 42,771.3	£ 61.9	£ 2.9	£ 8.1
Cheshire	£ 15.3	2,006	£ 40,289	£ 80.8	£ 42,303.1	£ 84.9	£ 4.0	£ 11.3
City of London	£ 5.9	739	£ 51,469	£ 38.0	£ 54,042.8	£ 39.9	£ 1.9	£ 4.0
Cleveland	£ 10.5	1,198	£ 42,366	£ 50.8	£ 44,484.6	£ 53.3	£ 2.5	£ 8.0
Cumbria	£ 8.2	1,160	£ 39,411	£ 45.7	£ 41,381.8	£ 48.0	£ 2.3	£ 5.9
Derbyshire	£ 14.0	1,767	£ 41,045	£ 72.5	£ 43,097.4	£ 76.2	£ 3.6	£ 10.4
Devon & Cornwall	£ 24.3	3,000	£ 42,094	£ 126.3	£ 44,198.4	£ 132.6	£ 6.3	£ 18.0
Dorset	£ 9.6	1,223	£ 42,172	£ 51.6	£ 44,280.2	£ 54.2	£ 2.6	£ 7.0
Durham	£ 10.1	1,118	£ 41,614	£ 46.5	£ 43,694.7	£ 48.9	£ 2.3	£ 7.8
Dyfed-Powys	£ 7.6	1,145	£ 41,230	£ 47.2	£ 43,291.1	£ 49.6	£ 2.4	£ 5.2
Essex	£ 23.8	3,071	£ 42,306	£ 129.9	£ 44,421.1	£ 136.4	£ 6.5	£ 17.3
Gloucestershire	£ 8.4	1,073	£ 42,405	£ 45.5	£ 44,525.5	£ 47.8	£ 2.3	£ 6.1
Greater Manchester	£ 50.0	6,444	£ 42,554	£ 274.2	£ 44,681.6	£ 287.9	£ 13.7	£ 36.3
Gwent	£ 9.8	1,308	£ 40,262	£ 52.7	£ 42,275.1	£ 55.3	£ 2.6	£ 7.2
Hampshire	£ 27.0	2,697	£ 44,144	£ 119.1	£ 46,350.9	£ 125.0	£ 6.0	£ 21.0
Hertfordshire	£ 16.3	2,009	£ 42,789	£ 86.0	£ 44,928.1	£ 90.3	£ 4.3	£ 12.0
Humberside	£ 14.8	1,889	£ 39,245	£ 74.1	£ 41,207.5	£ 77.8	£ 3.7	£ 11.1
Kent	£ 25.2	3,553	£ 42,233	£ 150.1	£ 44,344.7	£ 157.6	£ 7.5	£ 17.7
Lancashire	£ 23.4	2,895	£ 41,456	£ 120.0	£ 43,528.9	£ 126.0	£ 6.0	£ 17.4
Leicestershire	£ 14.6	1,829	£ 38,398	£ 70.2	£ 40,317.4	£ 73.7	£ 3.5	£ 11.1
Lincolnshire	£ 8.9	1,096	£ 42,458	£ 46.5	£ 44,580.4	£ 48.9	£ 2.3	£ 6.6
Merseyside	£ 28.1	3,396	£ 42,610	£ 144.7	£ 44,740.8	£ 151.9	£ 7.2	£ 20.9
Greater London Authority	£ 200.3	30,435	£ 48,401	£ 1,473.1	£ 50,820.5	£ 1,546.7	£ 73.7	£ 126.6
Norfolk	£ 11.8	1,609	£ 40,067	£ 64.5	£ 42,070.6	£ 67.7	£ 3.2	£ 8.6
North Wales	£ 10.8	1,458	£ 41,095	£ 59.9	£ 43,150.1	£ 62.9	£ 3.0	£ 7.8
North Yorkshire	£ 10.9	1,377	£ 40,571	£ 55.9	£ 42,599.1	£ 58.7	£ 2.8	£ 8.1
Northamptonshire	£ 10.0	1,187	£ 37,663	£ 44.7	£ 39,545.7	£ 46.9	£ 2.2	£ 7.8
Northumbria	£ 26.2	3,081	£ 40,305	£ 124.2	£ 42,320.3	£ 130.4	£ 6.2	£ 20.0
Nottinghamshire	£ 16.6	1,936	£ 41,596	£ 80.5	£ 43,675.3	£ 84.6	£ 4.0	£ 12.6
South Wales	£ 21.8	2,986	£ 40,246	£ 120.2	£ 42,257.9	£ 126.2	£ 6.0	£ 15.8
South Yorkshire	£ 22.2	2,370	£ 42,158	£ 99.9	£ 44,266.2	£ 104.9	£ 5.0	£ 17.2
Staffordshire	£ 15.1	1,567	£ 42,715	£ 66.9	£ 44,850.6	£ 70.3	£ 3.3	£ 11.8
Suffolk	£ 9.6	1,172	£ 41,428	£ 48.6	£ 43,499.9	£ 51.0	£ 2.4	£ 7.2
Surrey	£ 15.9	1,882	£ 42,181	£ 79.4	£ 44,289.8	£ 83.4	£ 4.0	£ 11.9
Sussex	£ 22.9	2,629	£ 43,274	£ 113.8	£ 45,438.2	£ 119.5	£ 5.7	£ 17.2
Thames Valley	£ 33.0	4,149	£ 44,516	£ 184.7	£ 46,741.5	£ 193.9	£ 9.2	£ 23.8
Warwickshire	£ 7.5	817	£ 42,643	£ 34.8	£ 44,775.2	£ 36.6	£ 1.7	£ 5.8
West Mercia	£ 16.6	1,989	£ 44,672	£ 88.9	£ 46,905.1	£ 93.3	£ 4.4	£ 12.2
West Midlands	£ 51.4	6,495	£ 42,678	£ 277.2	£ 44,811.8	£ 291.1	£ 13.9	£ 37.5
West Yorkshire	£ 38.1	5,137	£ 40,209	£ 206.6	£ 42,219.1	£ 216.9	£ 10.3	£ 27.8
Wiltshire	£ 9.1	992	£ 43,437	£ 43.1	£ 45,609.3	£ 45.2	£ 2.2	£ 6.9
Total	£ 949.3	123,171	£ 43,638.4	£ 5,355.6	£ 45,820.3	£ 5,623.4	£ 267.8	£ 681.5

5.3.5 In conclusion, in this section we have taken into account:

- the decline in real terms value of officers' wages since 2010;
- the need to recruit and retain sufficient numbers of officers to return force levels to the 2010 level;
- and affordability based on the settlement announced on 22 January 2010.

We believe that these factors together lead to the conclusion that, in order to manage a workforce that is similar in size to that of 2010, the Government must pay at the real terms level of 2010.

5.3.6 We know that the NPCC are intending to suggest an uplift of 2.5%. the rationale they have given for this is that it is what forces say they can afford. However, crucially, forces submitted that information to the NPCC *before* the funding settlement announcement on 22nd January. We believe that the NPCC must revise that position, and that forces can in fact afford 5%.

Recommendation 17: An across the board uplift of 5%

5.3.7 **Recommendation 17:** we recommend an uplift that will start to narrow the gap between the real terms earning of 2010, and today. Taking into account affordability, we seek an across the board uplift of 5%.

5.4 London Weighting (and South East Allowances)

5.4.1 The London Weighting is currently £2,505 since September 2019. The London Allowance maximum higher rate (£4,338 since December 2004) is payable to officers appointed on or after 1 September 1994 and not receiving housing/transitional rent allowances; the maximum standard rate (£1,011 pa since December 2004) is payable to officers appointed before 1 September 1994 who qualify for housing/transitional rent allowances. London Allowance is paid at an hourly rate to qualifying part-time members. The maximum an officer in London could theoretically receive from the combination of London Weighting and Allowances is therefore £6,843.

- 5.4.2 The South East Allowances were introduced in 2001, (partly to compensate for the loss of housing allowance 7 years earlier, in 1994), and the value was not changed until the second PRRB report, which recommended the maximum be increased by £1,000. However, no new money was made available to pay this.
- 5.4.3 The value of the SE Allowances is discretionary, which the staff associations have repeatedly raised as a concern. Although the maximum SE Allowance is £3,000, some forces pay £1,000 and others around £2,000.
- 5.4.4 The staff associations have sought for the London and SE Allowances to be systematically reviewed as part of the pay reform.
- 5.4.5 Last year in its Fifth report the PRRB commented on both the discretionary element and the need for review, agreeing with the staff associations. *“We have observed increasing differentiation in the value of the South East Allowances across the relevant forces. If these local changes are not managed with due care, there may be unintended consequences for recruitment and retention. We agree that the London and South East Allowances should be considered together in a coherent way in the planned NPCC review of allowances that will be part of the reform programme”*.⁵⁵
- 5.4.6 Unfortunately there has been no inclusion of these allowances in the review, and it is left to all parties to set out their respective positions in these submissions, for the PRRB’s consideration.
- 5.4.7 The exact rationale for the level of the London Weighting and South East Allowances is somewhat difficult to unpick, albeit the SE Allowances and London Allowances were introduced at the time when Housing Allowances were removed. And yet these are not clearly linked in Regulations to cost of living or house prices: despite there being little other explanation for them. They have not, for example, been rationalised in terms of the nature of the role being different in these regions.

⁵⁵ PRRB Fifth report, 2019 Para 4.58.

5.4.8 If it is accepted that cost of housing is a key factor, then the following table showing house prices by region gives some indication of the need for the London and SE Allowances. Data are taken from Her Majesty's Land Registry website, which uses a range of sources, including mortgage suppliers.

Table 9: Average House Prices by Region: data from Her Majesty's Land Registry.⁵⁶

Price band	Region	Average House Price
Highest	London	£472,232
High	SE England	£450,000-350,000 Surrey average is £444,766; Hertfordshire £401,735; and within Thames Valley, Buckinghamshire average is £400,463, and Oxfordshire £354,507 ⁵⁷
High	East England	Essex £314,752; Kent £297,956 ⁵⁸
Medium-High	SW England	£258,372
Medium	Midlands and North W Midlands	£198,345
Medium	E Midlands	£194,134
Lower	Yorkshire and Humberside	£166,904
Lower	NW England	£166,134
Lower	Wales	£166,245
Lower	NE England	£129,360

5.4.9 There are clear step differences between the costs in London (the highest tier); the South East; the South West; and other regions.

⁵⁶ House Price data for December 2019

https://landregistry.data.gov.uk/app/ukhpi?utm_medium=GOV.UK&utm_source=datadownload&utm_campaign=tool&utm_term=9.30_19_06_19

⁵⁷ SE England average is £323,428

⁵⁸ East England average is £293,928

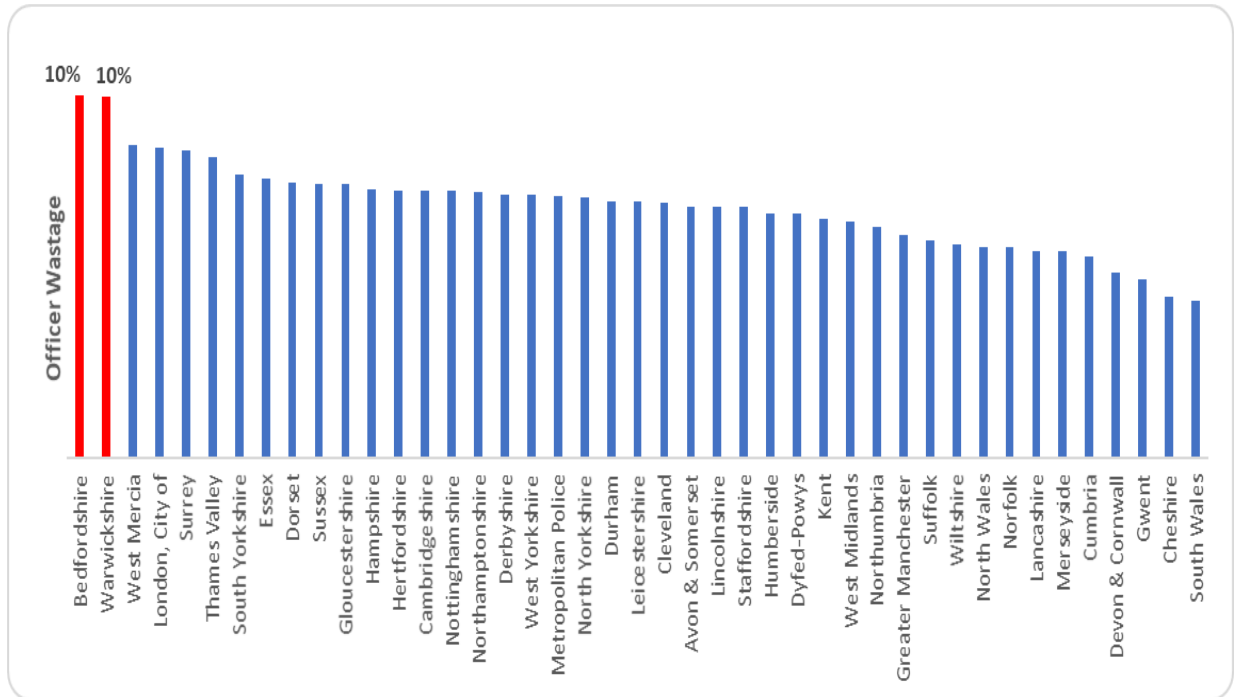
5.4.10 A few mortgage providers will lend a maximum of 5 times the applicant’s salary. For a Constable even at the very top of the salary scale, (£40,128) with 7 years’ service, this means that the maximum mortgage would be £200,640. Clearly in London and the South East this means that mortgages are out of the grasp of officers. (Bear in mind, too, that with an average starting age of around 28, officers won’t be on the top of the scale until aged 35. So – with an expectation of retirement at 60, beyond which officers are unlikely to be able to serve – officers’ mortgages are only likely to be for a 25 year period, rather than the 30 year period which is becoming the norm, and which allows lower repayments).

Table 10: Difference Between Maximum Mortgage at Top of Constable Pay Scale, and Average Regional House Price.

Region (county)	Average Price	Maximum mortgage	Shortfall
London	£472,232	£200,640	£271,592
Surrey	£444,766	£200,640	£244,126
Hertfordshire	£401,735	£200,640	£201,095
Essex	£314,752	£200,640	£114,112

5.4.11 Lest there be any doubt that this creates a problem in recruitment and retention, we have supplied, below, data regarding turnover from forces in all regions. It should be noted that 8 of the forces closest to London, sometimes known as the “doughnut” forces, are in the worst 13 forces for leavers. (Bedfordshire, City of London, Surrey, Thames Valley, Essex, Sussex, Hampshire, Hertfordshire). There is a likelihood that this pattern can be explained to some degree by pay.

Figure 31: Police officer turnover (including transfers) by force from 1 April 2018 to 31 March 2019⁵⁹



5.4.12 We believe that the London and SE Allowances need to be considered together, as there is a danger that if they are out of kilter then officers will be poached between forces. The NPCC recognises this. As one officer put it, responding to our Pay and Morale survey:

Officer quote: “We have officers joining from another force being paid increased London Weighting and a fuel card each month. How is this fair?” (Constable, 23 years’ service.)

5.4.13 Furthermore, in the NPCC’s recent survey of force HR departments, 6 forces cited proximity to the MPS as being a reason why they found it difficult to recruit officers.⁶⁰ Conversely the MPS sometimes feel that officers leave it to

⁵⁹ Calculated using leaver data from the Police workforce, England and Wales, 31 March 2019: leavers data tables and workforce data from Police Workforce, England and Wales, 31 March 2018: data tables .

⁶⁰ Blueprint 2.1 Survey, NPCC December 2019; draft provided January 2020.

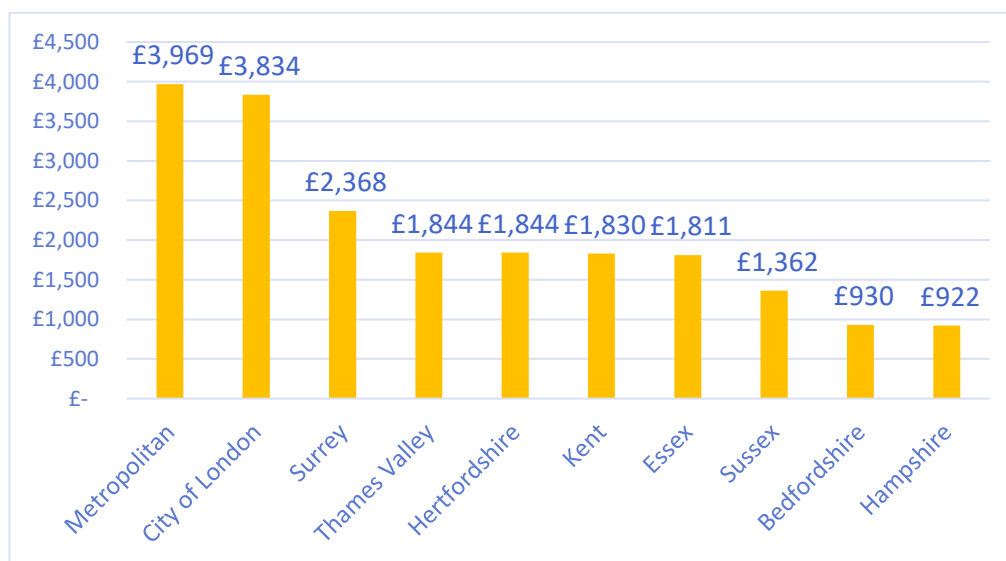
go to the doughnut forces. In the MPS workforce data for the end of August 2019 it is reported that 132 officers had left in year to join other forces.⁶¹

5.4.14 It is therefore incongruous that the employer has allowed a situation to exist whereby the London Allowances (including London Weighting and Allowance) are paid to all officers, whereas the SE Allowances are paid at different levels to officers within the “doughnut” forces, around London.

5.4.15 Our position is that all the SE forces around London should be paid the same, mandated, and not discretionary.

5.4.16 The current forces who receive SE Allowance, Essex, Hertfordshire, Kent, Surrey, Sussex, Thames Valley, Hampshire, and Bedfordshire are able to pay up to a maximum of £3,000: yet the Home Office’s Pay Census shows that those forces who could pay up to £3,000 do not do so. The figure below shows the average location allowance paid to Constables by force.

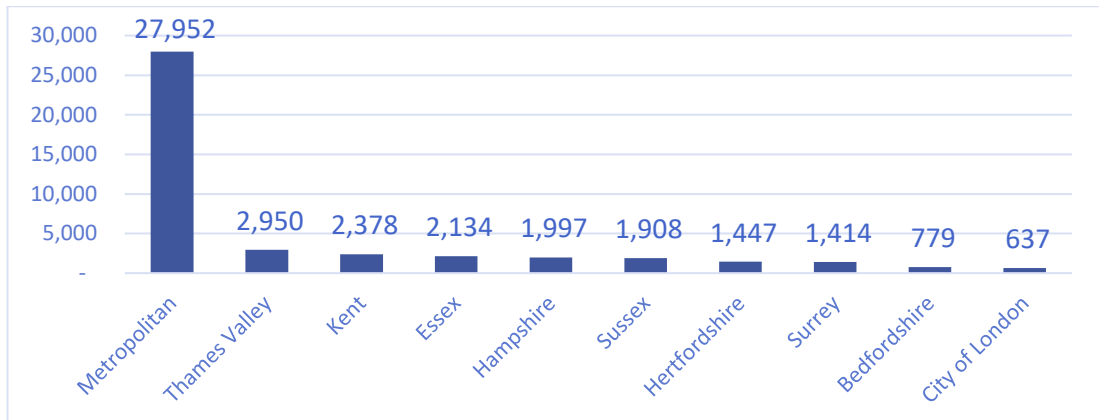
Figure 32: Constables’ Location Allowance Average per Police Force



5.4.17 Clearly in these forces some officers do not receive any location allowance.

⁶¹ Workforce data Report, Data to end August 2019, Metropolitan Police Service. (Data taken from the MPS corporate Hr database, PSOP).

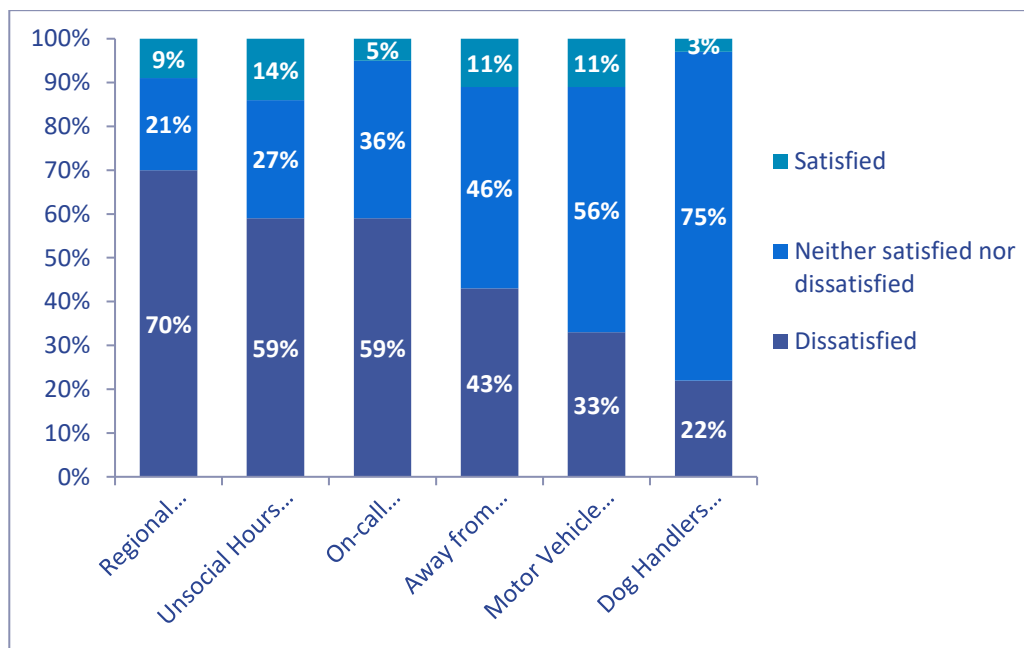
Figure 33: England and Wales: All Police Officers recipients of Location Allowance per Police Force



5.4.18 It is our understanding that, when it is paid, Bedfordshire and Hampshire pay as little as £1,000; while Sussex, Essex, Hertfordshire, Kent, and TVP pay around £2,000; and Surrey pays £2,500-£3,000. (We believe these data reflect the London Allowance payments only, and not the London Weighting).

5.4.19 Our Pay and Morale survey shows that, of all the allowances paid to officers, dissatisfaction was highest with SE Allowances. 70% of officers were dissatisfied.

Figure 34: Proportion of respondents in receipt of specific allowances who were satisfied and dissatisfied with these allowances



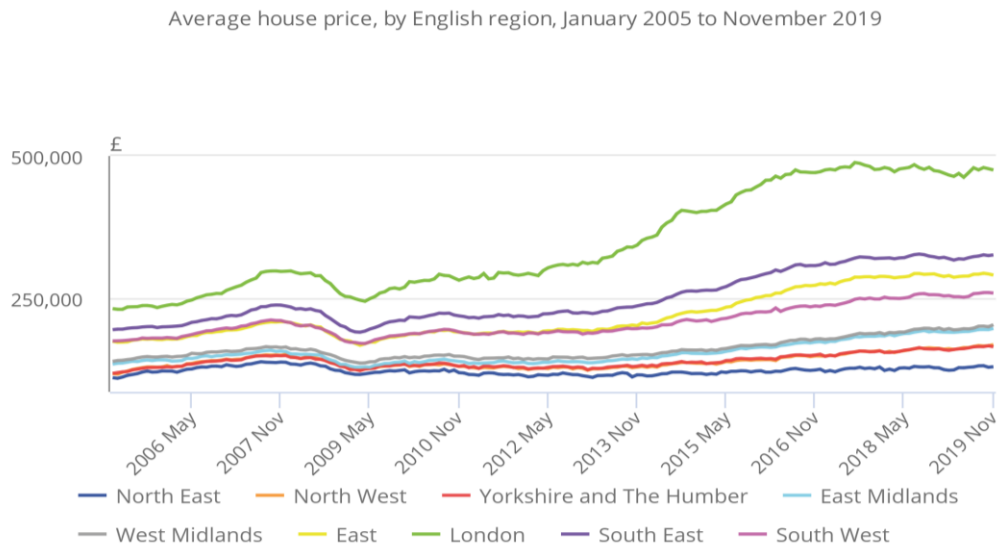
Officer 1 Quote: "I feel that the South East living allowance is not enough for officers living in this force area taking into account the cost of living, houses, petrol, transport etc. If you compare the identical salary paid to officers in areas of the country with low living costs we in the South East are hundreds of pounds a month worse off. £1,500 allowance does not cover the shortfall. I cannot afford to pay into my own pension fund because I need the full salary to live each month, despite coming from a dual income family." Constable, 5 Years' Service

5.4.20 To return to our mortgage calculation, assuming lenders are willing to take the allowance into account, then a payment of £1,000 per year increases the amount a Constable on the top of the scale could borrow from £200,640 to £205,640, while a yearly payment of £3,000 increases it to £215,640. Only in Essex would this mean officers would have to find a deposit of slightly less than £100,000, whereas in Surrey the deposit required would still be £229,126.

5.4.21 We believe it is worth considering a stronger link between the costs of housing and location allowances. Office for National Statistics data⁶² show that while the London and SE Allowances have – in reality – not increased since their introduction, (the increase being discretionary, and largely not implemented) house prices have drastically increased. Since 2006 house prices in London have more than doubled. The impact of the London and SE Allowances as meaningful incentives to work in these forces has therefore deteriorated considerably.

⁶² Office for National Statistics Statistical Bulletin, UK House Price Index: November 2019. Monthly house price inflation in the UK, calculated using data from HM Land Registry, Registers of Scotland, and Land and Property Services Northern Ireland.

Figure 35: ONS chart showing Average house prices by English region since 2005.



Pay and Morale survey perspectives on London and South East pay

5.4.22 Respondents in London were much more likely to be dissatisfied with basic pay (89%) and with their overall remuneration (88%) than respondents in other regions. Respondents in London were also most likely to report low morale (68%).

5.4.23 In all regions of England and Wales pay and benefits were in the top 3 reasons given as having a negative effect on morale. This was highest in London, where 88% of officers said pay and benefits had a negative effect.

5.4.24 There is potentially an impact on service delivery of this, in that it could be supposed that officers who have to travel a long way to work are more likely to be tired on shifts, and less likely to be able to report for duty at very short notice. Our Pay and Morale survey showed that 80% of respondents from London and 61% of respondents from the South East who did not live in their force area said the reason for this was that they could not afford to.

5.4.25 We are disappointed that there has been no review of London and SE Allowances, despite this being directed by the PRRB. Whilst we welcome the fact that in previous years these allowances have been updated by the same uplift that is granted for pay overall, we believe that this does not go far

enough. The increase in house prices in London and the SE over the last 10 years is significantly higher than other inflationary measures, such as CPI, (22.3%), CPIH, (20.8%), and RPI (30.6%). Using the ONS shown on the graph above, house prices in London ten years ago in May 2009 were 53% of those in 2019, and those in the SE were 60% of those in 2019.

5.4.26 Ironically, now that the Government has pushed the responsibility for a significant proportion of police funding onto local Police and Crime Commissioners, and has linked their ability to raise funds to the number of Band D properties in their force area, the London and SE forces are most able to raise funds from local taxation. This puts them in a position of being better able to fund the London and SE Allowances.

Recommendation 18: A systematic review of the location allowances

5.4.27 **Recommendation 18:** As in previous years we suggest that this issue needs to be properly considered by the NPCC and Home Office, with a policy paper outlining the issues, and a coherent solution as to how the employers intend to address these. We need a timescale to be set out for when this will happen.

Recommendation 19: London and SE Allowances increased to 150% of current values

5.4.28 **Recommendation 19:** In the meantime, we believe that officers in London and the South East should have these allowances uprated by a figure that recognises that house prices in these areas have increased to around 150% of their value 10 years ago. We therefore feel that as a minimum, the London Weighting should be uplifted in line with the pay award, and both London and SE Allowances should be increased to be 150% of their current values. That is, London Allowance should be £6,507; and SE Allowance should have a new maximum of £4,500. The current upper value of the South east Allowance (£3,000) must be non discretionary. We believe these figures would still be well within the boundaries that a full and proper review is likely to recommend.

5.5 Dog Handler's Allowance

Background:

- 5.5.1 Dog Handler's allowance compensates an officer for caring for police dogs on rest days and public holidays. In July 2000 a Police Arbitration Tribunal (PAT) award recommended that a single allowance of £1,554 be paid to dog handlers all ranks: having previously been paid at a lower rate for Constables and a higher rate for all other ranks. The same PAT award also recommended that instead of being paid per dog, an additional 25% of the allowance should be paid in respect of each additional police dog cared for by an officer.
- 5.5.2 The PAT award was ratified by Home Office circular 25/2000 (and implemented with effect from 1 July 2000). The Home Office circular also set out that: "this allowance will be updated annually with effect from 1 September 2000 in accordance with the current uprating mechanism, i.e., in line with increases in basic pay".

Value and uplift

- 5.5.3 The allowance has been updated in line with the annual pay award ever since. We believe it is important to maintain this link to ensure the value of the allowance is not eroded.
- 5.5.4 We agree with the comments of the PRRB in last year's report that "those proposing alternative approaches should set out the arguments and evidence to support their position". We are not aware of any review having been conducted by the NPCC with regards to the Dog Handler's allowance and we feel it would be wrong to break the link with the annual pay award in the absence of any alternative approach.

Kennel hour:

- 5.5.5 At the time the PAT made its award in 2000 it was common practice for dog handlers to finish shifts one hour early to care for the dog(s). At the time, the Staff Side of the Police Negotiating Board (PNB) sought to have this 'kennel hour' formalised but was unfortunately unsuccessful. However, the PAT award (which became PNB agreement 00/8) did state that: "any existing local

arrangements for dog handlers to finish shifts one hour early and to receive home-to-work mileage payments should continue to be honoured. We fully support the protection of the 'kennel hour'.

Mileage:

- 5.5.6 With regards to the PAT's comments on mileage payments for dog handlers this issue has recently come to light specifically in relation to motor vehicle allowance and dog handlers: in the case of *Sewell v Chief Constable of Cleveland Police*.
- 5.5.7 The High Court determined that a police officer who is required by a senior officer (acting on the instructions of the Chief Constable) to use their own motor vehicle to transport a police dog from the police station to their home (where the dog is housed overnight) should be paid a motor vehicle allowance (essential user). This would result in the payment of a lump sum allowance and payment per mile of the HMRC rate for business mileage.
- 5.5.8 We raised this case at the December 2019 Police Consultative Forum (PCF) meeting and are seeking to agree advice with the NPCC to be circulated to all forces and branch boards, informing them of the case and what action ought to be taken (with the aim of preventing the need for further litigation).

Recommendation 20: Uplift Dog Handler's Allowance in line with overall uplift.

- 5.5.9 **Recommendation 20:** Dog Handler's Allowance should be uprated in line with the overall uplift.

Annex A: DCW report – headline

Annex B: FOI – Recruits

Annex C: Leavers’ report

Annex D: Letter to Home Office (Peter Spreadbury) and reply

Annex E: Peer-reviewed Journal Articles and Conference Papers

Annex F: Letter to NPCC lead, 8 November

Annex G: EIA letter responses

Annex H: Explanatory note on RPI

All annexes are supplied as a separate file.