



***Response to  
The College of Policing  
Leadership Review***

*on behalf of  
the Police Federation  
of England and Wales.  
29<sup>th</sup> September 2015*



Police Federation  
Of England and Wales



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Lloegr a Chymru

Established by Act of Parliament

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29th September 2015

To:

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Dear Alex,

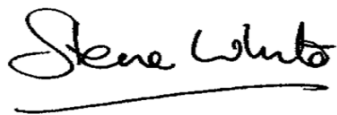
The recent Leadership Review is an ambitious and far reaching undertaking. We applaud the intention to enhance officer development, and to ensure that the service delivers policing that the public deserves.

Given the nature of the review, and the potential for it to impact on the efficiency, effectiveness, and legitimacy of policing, we undertook to provide you with a considered PFEW response. We have invested time and effort in gathering the

thoughts of our key member representatives. We provide you now with an evidenced and, we believe, comprehensive report.

Whilst throughout you will see that our representatives welcome continuous professional development, and have much that is positive to say about the review, there are some cautionary points that we trust you will consider in the spirit of helpfulness. There is concern that the rationale for some change is not transparent and we believe there is much to do by way of communication. There are also concerns about the potential unintended consequences: in particular, we would wish to see that opportunity is given to all, and not just a lucky few.

This is, of course, our response to the Leadership Review as it is currently outlined. We appreciate that thinking will evolve and change. We look forward to being involved in consultations throughout, on all those aspects that will affect our members.

A handwritten signature in black ink that reads "Steve White". The signature is written in a cursive style and is underlined with a single horizontal line.

Steve White, Chairman of PFEW

A handwritten signature in black ink that reads "Andy Fittes". The signature is written in a cursive style and is underlined with a single horizontal line.

Andy Fittes, General Secretary of PFEW

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## **Introduction**

1. The aim of this paper is to offer an evidenced and comprehensive response from the Police Federation of England and Wales (PFEW) to the College of Policing (CoP) Leadership review. As such, we have sought to gather views from a range of PFEW stakeholders (set out in more detail in the methodology section). We hope that this paper will offer a constructive and helpful response to the review, and provide a basis by which PFEW can work with the CoP to support the personal development of Police Officers without compromising on service delivery.

## **Methodology**

2. In preparing PFEW's response to the leadership review, PFEW devised a set of questions to put to a number of senior PFEW stakeholders in both the Interim National Board and Interim National Council. In order to assess whether there is, as yet, a shared understanding of aims across policing, and to determine key concerns of those with a significant role in member engagement, we asked:
  - i. What participants felt was the aim of the recommendations.
  - ii. Whether, in their judgement what was being proposed would achieve that aim;
  - iii. Whether there might be any unintended consequences;
  - iv. What the challenges (if any) might be in implementing.
  - v. We also asked what involvement PFEW might expect to have.
3. These questions formed the basis of in depth qualitative interviews and a workshop, and were designed to ascertain views on the leadership review both as a whole and in terms of each individual recommendation. The interviews and workshop were conducted by the PFEW Research team.
4. We seek to summarise the responses from the above stakeholders in this response. Due to the breadth of people interviewed there are a wide range of views presented, some of them contradictory. Such conflicting views are included so as to ensure a wide variety of opinion is recorded and presented.

## Structure of the paper

5. We begin by offering some key considerations regarding PFEW’s general comments on the review, before clustering the recommendations in into a number of key themes, as we believe that there is considerable synergy between them. The five themes we have used are:
  - i. Structure and powers: Recommendations pertaining to the structure and powers of officers and staff (2 and 7).
  - ii. Development: Leadership training, development, and recognition and reward (recommendations 6 and 8).
  - iii. Careers: Career pathways and recruitment / promotion policies (4, 5, and 9).
  - iv. Ethics: The Code of Ethics (recommendation 3).
  - v. Implementation: Recommendations regarding the implementation of the review (1 and 10).
6. Whilst respondents welcome the opportunities set out in the Leadership Review, there were also some notes of caution. Rather than set out the arguments in favour of the Review, which have been considered already in the Review document itself, we have focused here on the issues raised. For each theme, we have set out overall reactions, and the perceived aims of the recommendations. We have included any concerns about the principles of the recommendations, and the practical implementation of them. In particular, we have set out any unintended consequences that respondents believed might occur. We have also noted specific ways in which PFEW would intend to engage.

Fig 1: The clustering used to review the recommendations.

Cluster	Recommendations
Structure and powers	2 Review the rank and grading structures in warranted and staff roles 7 Increase flexibility in assigning powers and legal authorities to staff
Development	6 Create a new model of leadership and ...development, accessible to all in policing 8 Develop career opportunities which allow recognition and reward for Advanced Practitioners
Careers	4 Provide a structure of entry, exit and re-entry points to allow for career flexibility. 5 Advertise all vacancies for recruitment and promotion nationally 9 Introduce national standards for recruitment and promotion into all ranks and grades
Ethics	3 Embed the values articulated in the principles from the Code of Ethics in all local and national selection processes
Implementa-tion	1 Existing police leaders should influence and drive the required culture change... 10 The Home Office should review whether existing structures, powers and authorities...are sufficient support consistent implementation

## Key points regarding our response

7. The following are key points that explain both the nature and context of our response. They should be borne in mind when reading the detail that follows.
  - i. We support the idea of development, and opportunities for officers to develop themselves are to be welcomed. Overall PFEW want to support initiatives to enhance officers' careers and development experiences. We also support any activities that will ensure policing evolves to meet operational need, and provide a better service to the public.

That said, some reservations are expressed regarding the unintended consequences of some of the suggestions around how development can be achieved, and we are keen to work with the College to prevent any possible such effects.
  - ii. As noted, the method used means that in some cases there are what may seem contradictory views expressed. This is in part simply because we asked lots of people. But the fact different views have been put forward may reflect different understandings of what will happen – so it raises a question as to whether the current communications are clear enough.
  - iii. Generally, respondents feel that the evidence base is not transparent. We appreciate that a huge number of articles have fed into this review, and are listed, but it isn't clear from the documents provided how these articles relate to the ten recommendations. There is no audit trail relating each recommendation to the specific evidence used to derive it. We believe clarity over this would help increase understanding, and potentially assist with buy-in.
  - iv. We have provided examples of how PFEW would hope to be involved. We believe there is a role for PFEW to provide support and challenge to the Leadership Review, providing the informed voice of members.
  - v. We are responding to the Leadership Review as it is currently outlined. We anticipate that the Review will evolve and change. In turn, our position may evolve. However this document represents our thoughts based on the information available to us at the current time.

## **THEME 1: Structure and powers**

**RECOMMENDATION 2: 'Review the rank and grading structures in policing across warranted and staff roles.'**

**RECOMMENDATION 7: 'Increase flexibility in assigning powers and legal authorities to staff.'**

### **Aims**

8. Interviewees felt there is an intention to remove certain ranks from the police force and potentially assign these roles and other tasks normally undertaken by officers to members of police staff. Overall therefore, these two recommendations suggest a reduction of officer posts and increase of responsibilities for police staff. The primary concern expressed was that this would impact on the nature and legitimacy of policing. There was a concern that the primary driver of this is cost cutting, without full analysis of the operational impact, impact on aims and objectives and the impact on the legitimacy of policing.

### **Implementation and Impact**

9. Many felt these recommendations have the potential to undermine the Office of Constable. The Office of Constable is conferred on officers: they are not employees, strictly speaking they cannot be ordered to do something they believe to be wrong, and as such have an enhanced ability to maintain independence and impartiality. Given that they hold coercive powers, this is considered by many to be of fundamental importance in maintaining legitimate democratic policing. It is a concept considered sacrosanct to many in policing, and is at the heart of police culture.
10. By 'blurring the lines' between civilian staff and officers, these recommendations, if enacted, might fool the public into thinking civilian staff and officers are essentially the same, whilst also confusing them as to what an officer or member of staff could or couldn't do. In addition, a case was made that the public need to be consulted on this recommendation, as they will be directly affected.
11. It was suggested that there may already be some confusion in the minds of the public as to what powers PCSOs have, as compared to officers, especially given the similar of uniforms. Given that some forces appear to be actively considering removing PCSOs at the moment, this recommendation seemed to be potentially at odds with some other initiatives.
12. From an operational perspective, respondents queried whether supervisors would be able to establish at any given point in time which staff/officer had which power. This they argued could make workforce planning difficult. In addition, questions were raised as to whether staff actually wanted to take on more warranted powers with another respondent noting if they did end up doing so how would they be represented? That is, if they have warranted powers, will they be entitled to representation by PFEW? Further, another respondent expressed concern that this recommendation would encourage officers to pursue career over public service.



13. The omni-competence of the Office of Constable was cited as being a hugely beneficial aspect of policing, giving the service flexibility. There were questions raised as to whether any move away from that, giving different powers to different individuals, is driven by cost saving, rather than by service delivery.
14. In terms of how this would be achieved, participants felt the intention would be to introduce a banding structure whereby staff and officers would be placed in the same pay bands, which would replace the distinct pay systems currently in place. Some participants felt that pay would ultimately be linked to powers, (that is, the more powers you have the more you get paid), while others felt that pay might be related to skills and development. Participants noted that officers have a number of conditions placed on them that do not pertain to staff – restrictions on private lives, the requirement to react 24/7 in the face of a crime; the ban on striking; and so on – and reassurance would be needed that these aspects of their role would continue to be compensated for. Clarity over this would be welcomed.
15. Further, whilst the review doesn't make clear which ranks may be removed under recommendation 2, there was some speculation based on what has happened in forces already. Hence, there was a view that the rank of Chief Inspector is especially vulnerable. Some respondents felt that there is an intention to go even further, flattening the entire structure of the police, both in terms of rank and pay structure; some saying to the extent where police, ambulance and fire services were effectively combined to form one large emergency service. Officers also had concerns about the likely impacts on the service to the public. It was felt that the abandoning of a rank structure might put the command and control nature of the police under threat, and that this would undermine operational capability and responsiveness. Indeed, evidence as to how fewer ranks might improve service delivery would be greatly valued. In the absence of such evidence, it was felt by some that the main motivator behind this recommendation might again be cost cutting, and not a better police service. An example of how such cost cutting might apply is the proposal put forward in recommendation 7, namely that staff and officers might be used more interchangeably. That is, some felt the intent is to save money by getting lower paid civilian staff to perform functions previously undertaken by officers.
16. There were also other issues concerning the potential flattening of ranks. Respondents said for instance that if you remove entire ranks then certain duties unique to the affected rank could be lost. Moreover, questions were raised about who would take on the duties of the lost rank. Respondents argued that the step up between ranks that were left following a restructuring (for example between Inspector and Superintendent) could be as large as to present significant operational challenges. As such, respondents said that risks relating to officers lacking experience for certain ranks could arise, leading to an increased number of court cases regarding misconduct, and incidence of stress among these officers. There was some concern they would be set up to fail. There was also a concern that the removal of ranks could place even more pressure on those that are left, especially in a downwards direction. On this point, some participants noted that under the Sheehy review in 1994 Chief Inspectors and Chief Superintendents were removed in a number of forces. This action was not considered to have been universally successful. Participants asked whether the reasons for failure in the past have been adequately examined and understood prior to making this recommendation. (As alluded to in the 'key points' part of the paper on page 6, an overarching comment made was that while the Leadership Review lists reviews and studies

that have been used in consideration of recommendations, the link between the content of these reviews and the recommendations is not transparent).

17. Further, respondents felt that removing or diminishing the command and control structure in the police would be an operational mistake. They argued that due to the unique nature of policing, which requires (amongst other things) quick and clear responses to major incidents, command and control is required and is the best way to manage such events.
18. In addition, there were concerns also that staff given certain warranted powers may not be adequately trained to undertake them effectively. That is, if staff given powers were not adequately trained, instances of misconduct and other misdemeanours could increase.
19. Other respondents also felt that this recommendation could result in greater levels of autonomy and reduced supervision, which could potentially also result in the above negative consequences. Poor training provision may also take place, especially given (in the eyes of some) a general priority found in the review to cut costs wherever possible. Further evidence of consideration of the operational requirements, the span of command appropriate, and ability for a flattened rank structure to function well (perhaps via scenario based simulation) would be welcomed.
20. On the other hand, some respondents also believed that this would give opportunities for officers to take on more specialised roles, and that this reflected the increasingly complex nature of crime.
21. As such, there is also a need to be realistic regarding timescales for this recommendation.

## **PFEW involvement**

22. In relation to **recommendation 2**, respondents argued that there is a need to get 'back to basics' regarding understanding and defining what 'we' (the public, existing officers, CoP, Home Office and other important stakeholders) want the police ranks to be. It was felt there is a need to build a competency framework around that, and that PFEW could and should be involved in this discussion. It was also felt that discussion is needed because of the size of the reforms put forward here and the potentially significant impact on the nature of policing, and the public's interactions with policing.

## THEME 2: Development

**RECOMMENDATION 6: 'Create a new model of leadership and management training and development which is accessible to all within policing'**

**RECOMMENDATION 8: 'Develop career opportunities which allow recognition and reward for advanced practitioners.'**

### Aims

23. It was understood that these recommendations aim to deliver a standardised model of training and development (CPD) to all officers - which was welcomed – but whereby officers would be responsible for their own personal development.

### Implementation and Impact

23. Whilst respondents felt that more training and development opportunities for officers is a good thing, there were reservations about how this recommendation might be delivered and respondents had a number of suggestions as to what might prevent the successful implementation of these proposals.
24. The first is available financial resources. That is, some respondents expressed concern that cost for taking on training would be passed on to the individual officer, and that as such, officers on lower salaries and from poorer backgrounds would be penalised against those with greater financial resources. Women (especially those with childcare responsibilities) and BME officers were thought to be at particular risk. On the other hand, one respondent noted that this set of recommendations would give autonomy to officers in regard to their professional development, thus reducing levels of micromanagement.
25. Secondly, in terms of time resources, it was felt that given the great pressures many officers are under in this regard, and with this seemingly set to increase in the future there was concern that some officers and some ranks in particular would simply feel they could not set time aside for personal training and development. That is, some respondents expressed concern that an increased emphasis on CPD might direct officers away from 'what they should be doing'. It was felt that strategic roles would be able to better access training whereas more frontline roles such as Sergeants would find it more difficult.
26. In addition, one respondent expressed concern that the desired outcomes would not be achieved if cheaper training methods such as e-learning were employed. Indeed, other respondents gave recollections of shortcuts being taken so as to make it appear officers had undertaken certain training, when in fact they had not! Further, another respondent questioned whether a 'private sector ethos' would be present within the training. That is, officers undertaking this training could be driven away from a public service mind-set.
27. There were many comments on skills and standards. Indeed, some respondents argued that recommendations focussing on 'skilling up' could attract 'badge collectors' whose primary motivation for undertaking training courses is to obtain pay increases and not necessarily to

be a better police officer. It was felt that a remedy to this could be making sure those who attain certain skills actually use them. Also in regard to training, the question of how officers would be identified for certain training courses was also raised. Further, concerns were mentioned over access to such training. Would those working part time and those on limited duties for example have the same access as other officers? In addition, the issue of whether officers across all 43 forces would be trained to the same standard was raised. In all cases, whether training to become Advanced Practitioners, or developing other skills, no pay system should establish quotas, whereby only a certain percentage of officers can attain the pay.

28. Another concern was that front line staff that didn't have specialisms would lose out. That is, as a result of the implementation of these recommendations, there would be lack of recognition of those who carry out frontline duties and the general 24/7 call and response function. This it was felt was especially unfair given that in the view of some, frontline officers would be paid less than specialists but have the greater impact in terms of public service. Further, there was concern that the extra training officers have to undergo in order to obtain their status as officers would be undermined and made redundant as specialisms are given to civilian staff. One respondent also argued that everyone should be involved in this recommendation, and that all officers need to see a benefit. There may be a tension between the need for officers to have specialised skills, and the need for officers to be omni-competent. Particularly in times of austerity, forces need officers who are able and willing to be moved to any role. Participants cautioned against introducing any measures that might unintentionally mitigate against this.
29. There is a concern, too, that the introduction of Advanced Practitioners may be divisive. Questions were asked as to how it would be enacted. For example, there was some concern that this would be used a little like the Special Priority Posts (SPPs), and available only to a few.
30. There was also a request for more information to be given regarding what exactly these standards will look like. One respondent stated that they should not be arbitrary or targets based as it might encourage an attitude of 'once we've reached the target we'll stop trying.' Another potential risk with standard setting is that officers may leave the service due to them not wanting to go through tests every three years or so to prove they are at the required standard for their particular role. There was some concern that any additional requirement to be tested against standards would be impractical, as it might risk being bureaucratic and creating extra work.
31. The role of the supervisor was also subject to discussion, with some feeling that the amount of supervisors would decrease as advanced practitioners were given greater autonomy. This could have the consequence of leaving the remaining supervisors with more staff to supervise, which could lead to greater levels of pressure. In addition, another respondent said that due to the drive towards more specialists in the force, supervisors would need a certain degree of knowledge in order to supervise them effectively. As such, they argued that those with omni-competencies are easier to supervise and is also cheaper for the service. Finally, it was purported that supervisors could end up being paid less than those they are supervising if pay is linked to specialisms (that is, advanced practitioners could have more specialisms than supervisors, therefore being paid more.)

32. Several stated that to help place professional development at the centre of policing and incentivise it amongst others, professional development would likely be linked to pay. There were concerns over how this might be achieved. In particular, the recent experience with the Assessing and Defining Competence work was mentioned. It was felt that whilst it may make some intuitive sense to attempt to reward professional development, the costs of actually implementing a system to monitor this, and the resources required in terms of supervisor time, might actually outstrip the benefits. There is a fundamental tension between ensuring that any system that determines pay is robust enough to withstand challenge, and it maintaining a workable solution that does not grow bureaucracy, especially at a time when resources are limited.
33. Participants felt that there was a desire to incentivise officers to engage in training and obtain high levels of CPD. This, it was felt, is part of a bigger drive to link pay not with rank but according to skills and specialism which could be awarded to staff as well as officers.
34. Some felt that the intention would be to have a system where all training and development is provided to all emergency services at once (views regarding merging of emergency services in regard to other recommendations have been also mooted).
35. Further issues that respondents felt need to be addressed include the need for training to be accredited, the need for this to be encouraged from both leadership and driven by the individual officer, and the need for consistent practices and processes so as to ensure officers from across the 43 forces are treated fairly and have the same access to training courses and resources.

## **PFEW Involvement**

36. Overall, the PFEW participants had many questions as to how this would work. It was acknowledged that there will be many positives, but also that the system required to enact this, and to reward individuals fairly for their contribution, might have to be complex. In regard to supporting this recommendation, it was noted that PFEW would want to support equality of opportunity, and would wish to check whether training courses are being implemented fairly across all 43 forces (in terms of access for example).

## **THEME 3: Careers**

**RECOMMENDATION 4: 'Provide a structure of entry, exit and re-entry points to allow for career flexibility.'**

**RECOMMENDATION 5: 'Advertise all vacancies for recruitment and promotion nationally'**

**RECOMMENDATION 9: 'Introduce national standards for recruitment and promotion into all ranks and grades'**

### **Aims**

37. Respondents felt that the intention running through these recommendations is to attract new talent and diversity from outside policing (both from the private and public sector), open up the applications process and remove the 'old boys club' (that is, reduce nepotism) that is sometimes perceived to exist in police recruitment, making the process more transparent by taking recruitment outside of police control and introducing national standards.

### **Implementation and Impact**

38. One of the major misgivings surrounding this group of recommendations was the apparent focus on external, rather than internal talent. That is, a number of respondents felt that the CoP want to bring in external talent and methods at the expense of the considerable internal talent that already exists within the force. Participants asked – what is being done for existing talent? What do those responsible for the Leadership Review feel is missing from the current workforce? There is some concern that the Review assumes that there is a problem that needs to be fixed, that has not been fully outlined.
39. In addition, it was felt that this recommendation and its focus on attracting and harnessing external talent has the potential to undermine the notion that a police officer should be able to 'work their way' up through the ranks. Neglecting such a career pathway might have an impact on the quality of service provided to the public (that is, an officer who has worked their way up has more knowledge of the police and is therefore able to provide a better service to the public.) On the other hand, one respondent noted that exposure from outside the service could help combat insularity within the police, with another saying that these recommendations could be improved upon through the introduction of policies designed to recognise transferable skills from both inside and outside the force. Doing so could have a whole host of positive benefits; from better morale to more opportunities for officers to develop their careers inside or outside the police service.
40. On a related note, officers would have to prove that they have the required competencies for certain roles, which will then result in the award of a certain status. Officers would then be required to prove that they've still got the required skills after a certain period of time. Some saw the logic in doing this, particularly in terms of the changing nature of crime in the UK. Some also argued that it would result in greater recognition of professional and

specialist skills within policing, whilst also acknowledging the need for greater specialism in order to tackle certain types of crime. Others, however, said that this would blur the lines between officers and staff. In this respect, parallels can be drawn here between these and other recommendations, such as recommendation 8 and recommendation 2.

41. Another area of discussion focussed in on Advanced Practitioners. Some believed that these recommendations would result in Advanced Practitioners being given more autonomy and requiring less supervision, with others requesting further clarity as to what the term means. Another added that this had already been done before through the Objective Structured Performance Related Examination (OSPPE) exam which was halted in 2014. Some were in favour of this proposal, arguing that it would result in greater recognition of professional and specialist skills within policing, whilst also recognising the need for greater specialism in order to tackle certain crime (some of which, such as financial crime, is becoming more prevalent). Others however had a number of concerns, which are outlined below.
42. Moving on, and given the desire to see a flattening of ranks in the service, the number of applicants per vacancy may also prove a challenge. That is, if the number of ranks and roles in the police is to reduce (in line with recommendation two for instance) then there may be the same (or more) applicants applying for fewer roles.
43. Further in terms of recruitment, a number of respondents expressed concern that the costs of implementing a nationalised recruitment system have not yet been addressed. It was believed the costs to forces would increase. Likewise with other recommendations, respondents noted that there was no evidence provided to support this recommendation or in terms of how it'll be implemented across the police.
44. In terms of the potential impact of a nationalised recruitment and promotion strategy, on individuals, it was argued that a nationalised recruitment strategy could negatively impact on BME applicants, given that they are less able and/or willing to move around England and Wales due to family ties.. Furthermore, officers who have dependents and in particular single parents with children could also experience negative impacts.
45. There was concern, therefore, that the opportunities would increase for young, white, mobile males, while diminishing for older, female, and BME officers. This would need to be carefully monitored. Further, this is not only a matter for the individuals concerned. There is research that suggests that forces are more effective and perceived to be more legitimate when they are representative of the community served. There are significant concerns about the impact on the delivery of policing – especially community policing – if officers move in and out of communities that they do not represent.
46. The impact on forces was also considered. The pull into some areas may also affect the calibre of candidates to particular forces: forces that are deemed more desirable to live in will attract more applicants than those in less desirable areas. They added that getting rid of police houses has made it more difficult for officers to travel, which may have implications in implementing a national recruitment strategy. To cite an example, the Metropolitan police currently require all applicants for officer posts to reside within the M25. If this remains the case then we can foresee a potential conflict between this desire for a nationalised recruitment strategy and local strategies currently in place within some forces. Indeed, Chief Constables might resist because a national recruitment strategy could mean that they lose a degree of control in that they won't be able to select the candidates they want from their own force. Police and Crime Commissioners may likewise resist because this

recommendation flies in the face of the localism agenda. Thirdly, the rank and file may resist because a national recruitment system could open up competition for vacancies within their own force to others from outside.

47. There were also comments made regarding remuneration for those that the forces wish to attract in at ranks other than Constable. That is, because equivalent roles in the private sector pay significantly more than those in the public sector (the example of superintendent was given whereby he/she may earn £70,000 in the police service but an equivalent role in the private sector could command a much higher salary) only 'second rate' candidates from the private sector would be attracted to the police. As such, quality of service would suffer. In addition, some said that officers leaving the force for a role in the private sector could earn a better wage and therefore would not re-enter the force again. Thus this could lead to their talent being forever lost and an exodus of top policing talent. On the other hand, it may also be the case that there is an intention to attract public sector talent too.
48. The current Direct Entry scheme has not attracted the level of talent anticipated. Only six candidates have been offered jobs, out of 800+ applicants. This has proven to be a hugely expensive way to attract a very small number of suitable candidates. The view was put forward by participants that this type of scheme needs to be subjected to a full and transparent cost benefit analysis, before further public money is spent on extending it.
49. One respondent questioned whether officers even wanted flexibility within their career and whether the notion that 'Generation X and Y' desire for career flexibility is actually a myth. It is noteworthy that much of the research around the concepts of generation X and Y is cross-sectional rather than longitudinal. The idea that these generations want flexibility in their careers may be related to their age, rather than being a characteristic of a particular cohort group: younger people tend to believe that they want mobile careers, but this changes when people gain families and responsibilities.
50. For some, this group of recommendations fitted into a perceived cost cutting agenda (an agenda which for some is prevalent throughout the whole review): some even went as far as to say that training might be so difficult as to ensure officers never achieve the results required to qualify for pay increases. Others felt similarly that officers would effectively have to jump through an 'extra hoop' in order to obtain a pay rise. There was also a view among some respondents that there is an intention to save money on pensions. That is, these recommendations were seen as a way to encourage
51. In terms of barriers to practical implementation, some felt more information was needed regarding how pensions would be affected if they left the service, only to re-enter again. For example, would officers be able to transfer their pensions elsewhere in the public sector if they left the service? shorter careers in policing, meaning that pensions would be much reduced.
52. Related to this, some believed that those re-entering the service (that is, some felt there was a desire for this in the review) would be required to 're-skill' and become familiar with new policing regulations and practices that had been introduced in the officer's absence would act as a disincentive to re-enter the police service. That is, the longer an officer is out of the service, the harder it could be to get back in.



## **PFEW Involvement**

53. The desire for PFEW to sit down with CoP and Home Office and work through the details of recommendation 4 was set out.
54. In regard to recommendation 5, it was argued that it is crucial to get the processes right in implementing a nationalised recruitment system. It was felt that there was a need for further clarification regarding how and where roles would be advertised and that PFEW should be involved in shaping standards and recruitment processes. In addition, a respondent said that PFEW could be involved in monitoring and promoting the BME element of this recommendation, and that this function is already a PFEW strength.
55. In terms of PFEW involvement relating to recommendation 8, respondents said that PFEW can play a role in ensuring that all officers who reach the required standards obtain the appropriate advanced practitioner status and associated pay. Respondents were keen to ensure that specified quotas are not being set and that all artificial ceilings to obtaining advanced practitioner specialisms are removed. In addition, respondents argued PFEW needs to be involved in setting competencies, to ensure the process is fair and proportionate.
56. PFEW is also keen to be involved in discussions around developing the standards mentioned in recommendation 9.

## **THEME 4: Ethics**

### **RECOMMENDATION 3: 'Embed the values articulated in the principles from the code of ethics in all local and national selection processes.'**

#### **Aims**

57. Respondents felt the aims of recommendation 3 are to embed the Code of Ethics throughout the police, and to achieve increased diversity and clearer standards.

#### **Implementation and Impact**

57. Respondents were wholly supportive of this recommendation, and had a number of suggestions as to how this could be successfully implemented.
58. First, respondents felt that the Code must be applied consistently across the 43 forces. That is, forces should not apply this in their own unique way as has been the case in the past with other codes and legislation. On a related note, other respondents felt that if this desire to embed the Code of Ethics was in the form of mandatory regulation, rather than guidance, then the likelihood of successful implementation would be greatly increased. Another way to ensure this code is implemented successfully is positive incentivisation. That is, interviewees felt that officers should be rewarded for implementing the code, adding that the Code should not be a 'stick to beat police officers with.'
59. In terms of risks to successful implementation, it was felt that if applied inconsistently, there is a risk that the Code will merely be 'words on a page' and not actually embedded as values throughout the police.
60. Another risk of applying this code inconsistently could be discipline issues being dealt with in an uneven manner, meaning officers could receive different treatment depending on their force.
61. Thirdly, it was noted that much of the Code of Ethics already exists within the officers' Code of Conduct and Police Professional Handbook, and that this duplication could lead to confusion within the police in terms of applying and embedding the Code.
62. Further, and in relation to restructuring of ranks and assigning powers to those not officers, it was queried whether these national standards will apply to both police officers and sub-contractors undertaking warranted duties (for example Serco, G4S etc.)

#### **PFEW involvement**

63. In accordance with widespread PFEW support for this recommendation, and the fact that PFEW has already signed up to the ideas expressed in the Code of Ethics, there is a definite desire from PFEW to be positively involved in supporting and implementation this recommendation. A number of possible paths for PFEW engagement were put forward.

64. PFEW can help monitor forces to make sure that they are consistently applying the Code and can help 'sell' it at ground level amongst its membership, for example incorporating the principles of the Code into PFEW training courses.
65. PFEW is able and willing to help gather support for this proposal within its membership, championing the Code.

## **THEME 5: Implementation**

**RECOMMENDATION 1: 'Existing police leaders should influence and drive the required culture change by demonstrating their own commitment to personal development and supporting the implementation of the review.'**

**RECOMMENDATION 10: 'The Home Office should review whether existing structures, powers and authorities in policing are sufficient to support consistent implementation of these recommendations.'**

### **Aims:**

66. Respondents viewed these recommendations as a desire from the Cop to get police leaders (i.e. Chief Constables) to buy into and commit to implementing CPD, and for police officers (the 'rank and file') to invest in their own professional development. Similarly, other respondents felt that the CoP wanted police leaders to lead by example in encouraging and implementing professional development throughout the police as an organisation.
67. In addition, respondents felt there was a desire to get the Home Office to drive forward and push through the changes recommended in the leadership, perhaps by conferring more powers on the College.

### **Implementation and Impact**

68. Most respondents saw recommendation 1 positively, as they felt it could create opportunities for more people across various ranks to engage in CPD. Respondents said that a cultural change within policing would be required whereby CPD is placed at the heart of an officer's role. Others said that CPD practices already exist within policing, and therefore questioned the need for a recommendation of this nature. A note of caution was expressed in regard to officers in some constabularies gaining better access to CPD than others. The CoP therefore needs to consider how to encourage Chief Constables to implement and encourage CPD in such a way as to not discriminate against officers in certain constabularies.
69. In terms of implementation, respondents foresaw a number of challenges. Firstly, there was a concern regarding the willingness of Chief Constables to implement these recommendations. That is, respondents said that due to the onus being on police leaders to encourage and implement this throughout their constabularies, agreement with leaders on this recommendation (and the associated mechanics of how exactly it will work etc.) is paramount. In other words, due to their considerable influence, if Chief Officers don't want to encourage and drive forward CPD within their constabularies as a whole then this recommendation simply won't be enacted. Conversely, some respondents said that if support could be obtained from Chief Constables then the likelihood of success in implementing this recommendation would increase dramatically. Another respondent argued that it was crucial to get the model right regarding the implementation of CPD and

that leaders needed to agree on this model in order for this recommendation to be a success.

70. Others expressed the view that each Chief Constable has their own way of running their respective constabulary. As a result, this might affect the uniformity of CPD being encouraged and delivered throughout the police. It was argued that this could be exacerbated by a leadership trait amongst Chief Officers to 'make their own mark' within their constabularies. Some respondents however said that it is also possible to inspire change from the 'bottom up' and that the CoP should not discount this in terms of implementing greater CPD in the police.
71. On a related note, respondents said that some forces 'ahead of the game' such as the Metropolitan, Greater Manchester and Merseyside forces would be able to deliver this recommendation more readily than other forces.
72. In terms of the Home Office's role, one respondent felt there was a risk that the department will rewrite legislation to suit their own needs, for example in terms of the five year, the comprehensive spending review and the general austerity agenda. Another respondent said that in accordance with the Home Office's preference for a 'hands off' approach in regard to policy making, it would be up to the College of Policing to create proposals for the Home Office then to mandate.
73. It was also felt that recommendation 10 may be an acknowledgement on the part of the authors that the current force structure, with 43 Chief Constables and Police and Crime Commissioners undertaking differing ways of adapting to austerity might be a barrier to consistent and fair application of some of the other recommendations. If this is the case, then PFEW would welcome an open and transparent discussion about the nature of structures, powers, and authorities that may impact on the Leadership Review and indeed on policing delivery more broadly.

## **PFEW involvement**

74. PFEW would welcome an open and transparent discussion about the thinking behind recommendation 10. In particular, what is the nature of structures, powers, and authorities that the authors believe may impact on the Leadership Review? What are their suggestions as to how these should be changed?
75. In particular regard to the tenth recommendation, one respondent stated that PFEW will want to see any draft legislation to comment on within the consultation period and that the Home Office should listen to any feedback given by PFEW.

## Conclusions

76. PFEW has long supported an evidence based review of leadership and development in policing. We are keen to see policing as a whole develop and grow for the future. There is much in the Leadership Review that is positive, and much that is thought provoking, and we welcome the opportunity to engage in debate over issues that are of fundamental importance to our members and the public. We look forward to continuing to do so, through the work strands that will arise from the Review.
77. Of necessity though, to ensure that where we feel there is a need for further clarity, or where apprehension has been expressed, we feel it is important to list these clearly to the College. There are a number of such points that arise. These are ordered according to where they appear in this report rather than by importance.
- i. Notwithstanding the fact that the Leadership Review contains a list of source material, there is no clear audit trail between these and the recommendations. Publication of such a list and appropriate referencing for the evidence used in support of the recommendations may help with the understanding and ultimately acceptance of the need for change.
  - ii. A related point is that there is no transparent analysis of the likely impact on individuals, and operational imperatives (in HMIC terms, efficiency, effectiveness, and legitimacy). Again, publication of such analysis would be beneficial.
  - iii. With regard to structure and powers, there are operational concerns as to how supervisors will be able to track and plan for which officers and staff have powers, and when.
  - iv. There are concerns that in moving to any new pay structure that is aimed at supporting these recommendations there will be appropriate acknowledgement of the restrictions on officers, and that for officers there will be fair and equal access to reward and recognition.
  - v. There are concerns that the move to conferring police powers on staff and flattening the rank structure might lead to error, causing misconduct cases, and ultimately impacting on police legitimacy and service delivery.
  - vi. Financial and time resources may prove a barrier to officers being able to attain CPD. The conflicting aims of CPD and delivering policing may have the unintended consequence of directing some officers away from the immediate priorities of the public. Further, more information regarding the overriding aims of the proposed CPD practices and how it links to more effective policing would be welcome.
  - vii. A related point is that incentivising development through pay may have unintended consequences. There is a tension between the design of a pay system robust enough to withstand challenge, and the need for a workable solution that does not grow bureaucracy. This has proven extremely difficult to achieve. The costs of developing and enacting such a sophisticated system must be weighed against any advantages of so doing. In addition, it is important to ensure that all those who obtain certain standards gain the corresponding pay awards.

- viii. Whilst the benefits of a more nationalised recruitment strategy are acknowledged in terms of reducing alleged nepotism and opening up opportunities for officers there is a tension between such nationalised proposals on the one hand and localism present throughout much of the police. Further discussion regarding how these two agendas can be reconciled would be welcome.
- ix. It is acknowledged that increased entry and exit points may positively affect the “insularity” in policing, but there is concern that internal talent will be left behind, as external talent are given opportunities that do not exist for them.
- x. The need to develop training and “re-skilling” packages for those entering and returning to policing should not be underestimated: this will require significant planning and investment.
- xi. There is much concern over forthcoming likely changes to pay structures. There is a need to communicate what is being considered, and achieve better clarity over the consultation process for these.
- xii. There is a need to be clear about how several of the recommendations can be enacted consistently across forces. This includes the Code of Ethics, but also the support for Continuing Professional Development.
- xiii. There is support for the Code of Ethics, and a wish to engage in ensuring its success.
- xiv. There is broad support for the idea that existing leaders should drive change.
- xv. With regard to recommendation 10, there is a view that this may be an acknowledgement that the current 43 force structure might be a barrier to consistent and fair application of some of the other recommendations. PFEW would welcome an open and transparent discussion about the nature of structures, powers, and authorities that may impact on the Leadership Review and indeed on policing delivery more broadly.

78. In summary, and returning to the way that we have clustered the recommendations:

**1. Structure and Powers, reviews of rank and grades, and increasing the flexibility of assigning powers (2 and 7).** This is the cluster of recommendations around which there are some objections in principle. These are believed by many to constitute a possible challenge to the Office of Constable; to potentially impact on operational delivery, and on public confidence. PFEW would welcome consultation on these.

**2 & 3. Development and Careers (6 and 8, 4, 5, and 9).** Overall, PFEW welcomes recommendations that would enhance career development for officers. There are few objections in principle to these, but there are believed to be challenges in practical delivery. In particular, there are concerns that in enacting these, care will need to be taken to ensure fairness of opportunity to all, to ensure that the service continues to represent the public served. PFEW is keen to engage, and to help ensure that these are undertaken in a way that is fair to all.

**4. Ethics (3).** PFEW has supported the Code of Ethics, and continues to do so. This was seen as a positive recommendation.

**5. Implementation (1 and 10).** PFEW welcomes the first recommendation. With regard to 10, PFEW would welcome an open debate as to what this would mean.