

Independent Review of the Police Federation of England and Wales

Report 2: Equipping the organisation for the Future

April 2025

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The purpose of the independent panel

We were set up as an independent panel in June 2024 by the Police Federation of England and Wales – referred to in this report as ‘the Federation’. The Panel was appointed by the Federation after an employment tribunal in 2023 found it had discriminated against officers who had previously made claims against the Government after being moved onto pension schemes that reduced benefits.

Our first report – the ‘Look Back’ report, published in December 2024 - examined the circumstances leading up to the Employment tribunal judgement, the decisions made by the Federation in response to the Police Pension Claimants legal challenge, the authoritarian culture of the Federation during that period and the consequences of the Employment tribunal for the Federation, its reputation and for its members ([Read the first phase report here](#))

This second report looks forward. It examines the current operation of the Federation and examines whether it is fit for the future and fulfils its aim to be an effective, responsive member organisation which meets the needs and aspirations of its membership; advances the members’ interests in the workplace; and has in place governance arrangements which are transparent and fit for purpose.

In coming to our conclusions and recommendations we have visited every region and talked to branch officials from almost every branch of the Federation. We have met National Board and Council members, members of the Federation staff, officers including the National Chair, the National Secretary, the Deputy National Secretary and the Chief Executive, those in acting capacities, individuals from the wider membership and external stakeholders. We have also observed a meeting of the National Board. A list of those we interviewed is given in Appendix 4. In preparing this report we have relied heavily on interviews with this wide range of stakeholders. In considering their perceptions we have not been provided with documentary or other evidence supporting their contentions.

A previous report on the Federation - the Normington review, commissioned by the Federation in 2013 - had as its remit to determine how the Federation:

- Acted as a credible voice for rank-and-file police officers
- Was able to influence public policy on crime and policing in a constructive manner

- Was an example of organisational democracy and effective decision making at its best allowing genuine ownership of the organisation by police officers and effective communication between members and the Federation at all levels¹

The questions asked of the Federation regarding these issues are as relevant today as they were in 2014. The Employment Tribunal judgement and its consequences for the Federation, the subject of the 'Look Back' report, reveals an organisation which was not built on organisational democracy and effective decision making. Rather, the reverse was true.

The question we must address now is whether things have changed. Whether, as a result of the actions taken since the tribunal judgement, the Federation can genuinely claim to be a credible voice for rank-and-file police officers, able to influence important stakeholders within the public policy sphere and to be built on solid democratic foundations and working practices.

Before we go any further, we want to recognise that the Federation has been on a difficult journey, and come a long way. The Normington Review of 2014 set a number of challenges for the Federation in reorganising itself from top to bottom which involved, in particular, the highly contentious abolition of rank committees. The organisation then had to deal with the challenge of Government reform of public sector pensions alongside degradations in the real pay of police officers and the resources devoted to policing, which put further strain on the front line which continues today.

Then the challenge to the Federation's handling of the pension dispute emerged, culminating in the devastating Employment Tribunal findings covered in our previous report.

In response to all this the Federation has, amongst other things, introduced the role of Chief Executive Officer to bring a professionalism to its operations previously lacking and enable its survival through the current challenges. This has been achieved - the Federation is still standing, has put its finances on a more secure footing enabling it to reach the recent settlement with the pension claimants, and this review has been initiated to help the organisation prepare itself for the future. That will, however, necessitate even greater reform to bring the Federation up to the mark of other public organisations and enable it to work together as one for the benefit of its members.

The Federation has published a Member Value Report covering its activities and achievements from 2021 to 2024. This report details the Federation's achievements in

¹ Normington Review, p.3

representing its members through its legal services, negotiation, influencing and representation of members both nationally and locally.

The report records some notable achievements by the Federation, including the £115 million in compensation that has been received by Federation members since 2021. The report also details the Federation's work securing increases to annual leave from 2 April 2025, and the Federation's lobbying of MPs and Peers to gain support for an amendment to the Data Protection Act aimed at reducing the administrative burden of excessive evidence redaction for police officers at the pre-charge stage.

The report also describes, region by region, the negotiation work done by local Federation branches on behalf of its members. There are some very notable outcomes including the Warwickshire – Custody Work Conditions Review which was the result of the Warwickshire Federation working with the Health and Safety Executive and Unison to address concerns about the working conditions of Custody Sergeants in Warwickshire. This is a strong example of effective representation of members, at local level, working with other stakeholder partners, to produce important and tangible results for members.

The Federation's achievements during this period are to be commended. It is important for member organisations to record how they have added value, through national and local action, to their members' working lives.

Whilst we acknowledge the Federation's achievements, we are also clear that there is much more that the Federation must do to act as a credible voice for rank-and-file police officers.

There are three main areas of reform that we believe are still work in progress, and which need a renewed injection of energy to secure - an energy which will be challenging in an organisation that is tired from dealing with the turbulence of the last decade.

The first area of reform, set out in section 1 (pp.7-21) is to set the Federation up in a way that enables it to deliver better for its members on issues that concern them. This considers how the Federation can become a more effective campaigning organisation, and identifies the areas that members tell us concern them today to suggest a programme of policy research and the foundation for campaigning action.

The second section (pp.22-30) addresses the issue of culture within the Federation, and its manifestation in the relationship between branches and centre, professional management and police officers, leadership positions and the rank-and-file. It also considers the issues of how

members of the Federation treat each other, and the disciplinary procedures used to ensure the behaviour one should expect in a modern democratic organisation.

The third section (pp.31-49) looks at the significant governance changes needed to make all these other changes have a positive effect, and how to inject external expertise into the organisation without robbing it of its democratic nature.

Finally, in the fourth section (pp.50-52) we consider the questions of implementation that will be an immense challenge for the Federation with such a root-and-branch programme of change which needs to be implemented over a constrained period of time, and which will require changes to regulations not in the gift of the Federation but residing with the Secretary of State for the Home Office.

We would like to thank all those who have given so generously of their time in building this report to help the Federation succeed. But we would like to thank in particular those rank-and-file members who spoke to us so passionately about their need and hopes for a Federation better able to support them in their vital and difficult jobs.

Direct quotes from people we have interviewed are shown in italics. We have attempted to distinguish in the report between comments which we have directly heard individuals make and those where we are reporting comments made to us but which we cannot independently verify.

Needless to say, the views expressed and the recommendations made are entirely our own.

Section 1 – A more effective campaigning organisation

All organisations with a role similar to trade unions need to be effective at ascertaining the issues of concern to their members, forging these into a coherent programme of policy research, developing specific and achievable campaigning asks and setting themselves up in such a way as to secure delivery. We believe that this is achievable despite the Federation not having the legal right to take strike action. Many of the aspects of the Federation's purpose and functions are akin to those of trade unions.² However, currently the relationship between many members and the Federation is too transactional – subscriptions are paid in exchange for legal protection. For many members they are no more invested in the Federation than they would be as members of an airline frequent flyers club or a building society. They do not feel the sense of a collective endeavour and mutual protection, and that anything that damages the Federation damages the interests of all police officers. Much of this can perhaps be traced back to the experiences discussed in our first report, when officers saw the Federation protecting the interests of some against those of the many. To change this perception requires not only structural and governance changes, but also a rediscovery of the Federation's purpose in representing and fighting for all police officers, campaigning on their behalf and with them to resolve the issues that affect their working lives. This section of our report outlines the current state of the Federation's campaigning activity, proposes changes to make it more effective, and outlines a possible programme of issues described to us by regional officers and Federation reps that could act as the basis for such campaigns.

- a. We heard repeated concerns that the Federation nationally was not effectively acting upon the issues which were important to its members

It is clear that policing has serious and numerous issues on which the Federation could be advocating and campaigning for on behalf of its members. All of the issues raised by branch officers – their perceptions of the growth in the complexity and amount of work Police Officers are required to do in the line of duty; the growth in the number of conduct charges and the processes for dealing with misconduct in the forces; the growth in media scrutiny of police officers in their interactions with the public and the stretched front line in policing which means

² Definition of a trade union on www.gov.uk/join-trade-union :“A trade union is an organisation with members who are usually workers or employees. It looks after their interests at work by doing things like:

- Negotiating agreements with employers on pay and conditions
- Discussing big changes like large scale redundancies
- Discussing members' concerns with employers
- Going with members to disciplinary and grievance meetings”

that resources are thinly stretched and priorities changed because of resource issues provide a context for the poor rates of recruitment and retention in policing.

The sense that the Federation has much to do to represent police officers to the public and important stakeholders, to negotiate on its membership's behalf and to secure real and tangible improvements to their working lives was re-iterated in every conversation we had with nationally important representatives of policing and other Police member organisations,

We were told, repeatedly, in our interviews with important representatives of policing that the Federation was isolated. That it did not have the influence it should have with nationally representative bodies and with the Home Office. In one memorable, and telling, phrase we were told *Unfortunately, there's a bunker attitude in the Fed. ... It needs a wholesale governance change.*

It was emphasised to us in these conversations that the Federation should be responsible for more than representing officers in trouble, but should be a point of influence and engagement with the police workforce, with stakeholders and with communities.

Normington recognised this essential purpose for the Federation: *'...if rank-and-file officers are to be denied normal trade union rights, they need a body which can represent them powerfully and effectively in discussions about police pay and conditions. This is not just about being guaranteed a hearing. It is an essential part of the 'deal' that the rank-and-files' views are respected and valued.*

This is as true in 2025 as it was in 2014.

- b. We found that there was a strong sense locally that the Federation centrally was not sufficiently progressing the issues raised collectively by sections of its membership.

The local branches felt a frustration that the regions were doing the effective campaigning work on behalf of members, but that the Federation centrally was not.

In investigating this perception, and in the interests of balance, we went to the Federation website's campaigns and policy posts. We note that the campaign section of the website posts pages on the Federation's Fair Pay Campaign, the Time Limits Campaign, Simplify DG6, Body Armour matters, to give some examples. However, there is little sense from the information on the website that these are dynamic campaigns. There are clear aims, but how these are to be achieved is unclear.

For example – the ambition in the Fair Pay campaign that it *'will result in an independently fair pay mechanism for police officer pay and conditions that officers and staff associations have*

confidence in' one which is 'an alternative to the unjust police pay review mechanism that has impacted officers for years and been the source of dispute with successive governments'.

What is not included in the depiction of the Fair Pay campaign is what alternative the Federation is seeking to the Police Pay Commission. This seems to be an extraordinary omission and a vital piece of an effective campaign – to articulate an alternative to the current arrangements and to argue why this would result in a preferable state of affairs – not only for the police service, but also for Government – who would have to be persuaded to make what would be a huge (and unlikely) change to public sector pay arrangements. Nor are there any indications on the website of the current activities underpinning the campaign. There is no section on member involvement in the campaign, for example.

Taken together, the campaign page reads more as a library of actions taken on behalf of Federation members. There is little sense of forward momentum or of rank-and-file officer involvement. Examples from the regions and serving police officers are notable by their absence (save a you tube video with an officer who spent years under investigation for misconduct). Many of the statistics are out of date (for example, the stats on public complaints made against officers are from 2018/19) when it is clear the issue of complaints against officers and the misconduct process are real and pressing issues affecting members in 2024/25.

We think it is imperative that the Federation is regarded widely as a respected policy making body, and a strong campaigning member association. We note that this was a key aim of Normington who argued that the Federation should be seen as a *'world class leader in employee voice'* – by which he meant an effective staff association *credibly representing its members' interests, providing necessary support and constructively engaging with public discussions about the future of policing at both a local and national level.*³

Recommendation 1

The communications function of the Federation should be radically overhauled to enable it to articulate and advocate effectively on the issues of concern to its membership, their aspirations for better working lives and better terms and conditions for the membership.

An evaluation of the current communications function should focus on:

³ Normington Review, p.13

- Much better internal communication between the centre, the branches and the regions so that emerging issues, changed priorities and emerging crises can be quickly understood, speedily and effectively represented and widely communicated through the range of media.
- Much stronger representation of Federation members in the Federation's communications activity so that they become the voices and faces of the Federation
- A stronger campaigning and policy narrative so that members and important stakeholders are clear about what the Federation stands for, what are its policy and campaigning aims, why these are important and how the Federation is intending to act in order to achieve them
- The use of one comms provider for the Federation nationally and locally – so that there is no confusion between the local and national Federation on its campaigning aims and tactics and the narrative that the Federation, as a whole, wishes to create about policing and police officers
- A unified Federation brand and brand image used centrally and locally to prevent dilution of the overall brand.

c. An organising approach to member engagement and activism

There is a clear message from the branches and regions that the centre is not sufficiently connected with them. Internal communication in any member organisation is challenging. It is too often assumed that key messages, once communicated by the centre, have been heard and understood when they have not. And we felt the frustration of Fed branch officials who believe that they are close to their membership, know of their aspirations and concerns, and want to be part of a Federation where their knowledge is fed into the centre and shapes the Feds' policies and campaigns.

Successful trade unions have, in the last 20 years, adopted what is called an 'organising' approach. What this means is that they have developed professional and lay structures which prioritise engagement with members and supporting them to mobilise and act to improve the terms and conditions in which they work.

There are strong examples of successful organising approaches within the Federation. One such is included in the Member Value Report 2021 – 25: the Warwickshire – Custody Working Conditions Review, (pp. 37).

In June 2023 several concerns were raised by Custody Sergeants regarding working conditions in Warwickshire custody suites. The issues highlighted included:

- Lacking the holding area while officers were present with prisoners, raising safety concerns
- Poor heating and ventilation with officers and police staff having to wear coats due to low temperatures and malfunctioning air conditioning.
- Lack of daylight caused by window coverings
- Inappropriate seating for officers and staff who spend considerable periods of time at computers
- Dim lighting in certain corridor areas creating discomfort and potential health and safety risks

In collaboration with Unison the Health and Safety (H&S) rep for Warwickshire Federation addressed each concern. The H&S Rep raised the issues with line managers and with the Force Health and Safety Officer to ensure that they were acknowledged and actioned.

This action resulted in the practice of locking the holding area being revoked. The Federation H&S Rep conducted a comprehensive review of all custody holding suites with the police Force H&S Officer. This review led to a structured plan to address the raised concerns.

Whilst not all issues could be resolved immediately work was initiated to rectify the problems, Updates were provided to custody staff to ensure transparency and demonstrate that improvements were underway.

This is a good example of a successful organising approach in which an issue which was causing concern to members of the Warwickshire force was identified by a Rep, who then took action, in this case with another stakeholder – Unison, and with their Force, to secure better and safer working conditions.

Unfortunately the organising approach is not widely understood and practised within the Federation. There is much that the Federation can learn from the examples of unions which successfully use an organising approach to secure changes for members, responding to local as well as national issues.

Successful organising unions understand that their workplace reps are the most important part of the union. They devote considerable resources to supporting workplace rep training and development, and to developing structures to enable rep voice to be clearly heard. One union, the National Education Union, has developed an app for reps which enables them to access on their phone the workplace policies and protocols of the union (so that they know the approach to take if members are facing workplace disciplinary procedures), what the members' legal rights are and where to go for support and help. This app updates the membership in the school and allows reps to download information and support for member

meetings – with PowerPoint presentations on key topics – which allow the members to get standardised information.

Local campaigns in organising unions are supported through media training for reps and branches, support for social media and press work and the creation of centralised communications which are able to be adapted by local officers in their region.

Organising unions use members as the voice and face of national campaigns. Case studies of members affected by issues on which the union is campaigning are regularly used – so that other members can relate to the campaign, can see it affects people like them, and can become engaged with the union locally and nationally.

Organising unions realise that reps and branch officials need support to create thriving local and regional organisations which are engaged with their membership and able to act on their concerns.

In the past 20 years that has led to the development of organising departments led and staffed by professional organisers whose job it is to strengthen the regional and local structures of the union.

Organisers support branch officials in recruiting workplace reps and supporting their continuing training and development, supporting branch meetings and branch officials, promoting the unions' policies and campaigns and informing national campaigns with local examples.

Organising and servicing members are not two different approaches. Organising unions, helping members to do more for themselves in the workplace, aim to improve members' terms and conditions and improve member voice and influence so that there is a greater respect, on the part of the employer, for the workforce. Organising unions do provide strong legal support for their members but work to improve working conditions so that there is less demand for legal support – because the issue has been resolved before it reaches that stage.

Organising provides the means for the centre and the regions to work as a whole. At present in the Federation there is frustration about failures of communication - both from the centre (which says that regions do not respond to its requests for local examples and information) and the regions (which says the centre does not ask the right questions and expects immediate answers). Organising is an approach which has been successfully adopted by unions to bridge that divide.

In the Federation's case, considerable resources would have to be redirected away from other areas of spending to create an organising function. In our view an organising approach will

not be successful if it is left to good will on the part of the branches, regions and the centre to communicate and collaborate better. Organising needs professional support to embed itself in the culture and practices of the Federation which is not used to this approach. We recommend, therefore, that the Federation creates an organising team staffed by professional organisers who would work in the regions with local branches to support their work with reps and members.

Recommendation 2

The Federation should provide professional support for branches and reps through the creation of an organising function with an organiser appointed to support branches in each region.

- The organising function would work to provide support for the development and strengthening of the Federation at branch and regional level – supporting the flow of information from the centre to the regions and vice versa.
- Regional organisers would work with branch officials to recruit reps and support their development and training at regional level. The organising team would support the branches in taking forward campaigns based on issues raised by their membership – including those issues outlined in this section of the report – giving real life examples of member issues to life in national campaigns – e.g. their perceived overuse of misconduct regulations; the effects of the police recruitment and retention crisis on front line policing and the effect of social media on police officers in the line of duty.
- The creation of an organising team managed by the existing executive leadership - with in the first instance a professional full-time organiser post in each region recruited by a competitive process - would be a significant financial investment for the Federation. It would involve a reallocation of resources, and a change in culture within the Federation which would prioritise member experience and their views on how policing should change and develop to secure better working conditions for police officers, and a better service to the public they serve.

d. Growing from the base – supporting reps and strengthening the Federation

We heard concerns about the quality and quantity of training for branch officers and reps. We were told that the Federation is not keeping up with the need for training and development which would enable it to support its members facing increasingly challenging work.

Not surprisingly, given the range and complexity of the work that branches do to support their members in the context of the complexity and demands of policing, there is a strong demand for more and better training of branch office holders so that they are better able to meet the needs of members and to engage more effectively with important regional stakeholders.

There is a feeling that the training offered is too little and done once only, with no refresher courses. There is also a strong feeling that the Federation, nationally, could do much more to provide central information and support for branches so that they do not have to re-invent the wheel.

One branch secretary has written a manual which details what Fed Reps can have facility time for – e.g. in cases of misconduct, health and safety and equality. He said *'it gives line managers the ammunition to say you can have duty time for this. I would really like the national Fed to produce the definitive guide to say this is what Fed reps are entitled to, and not leave it for local arguments.'*

One Branch Chair said *Nobody really tells you what to do, you get no support. I have spent the last 6 or 7 months fumbling through this role. You go from your day job running a team to meeting Chief Constables and MPs and get no support – no guidance. For new starters the support is woeful. There should be a role profile and guidance for a Chair. But there's no learning development or support I think that's poor. It has a knock-on effect. We've had reps for 3 or 4 years who are not getting CPD.*

There's nowhere easy to get information. Discipline, personal injury, negligence claims. So, in our region we have questions answered on a regional WhatsApp group – where experienced officers can give advice and guidance.

We do, however, understand that a new programme of training for full time branch board officers is being implemented. This will deal with legislation, conduct regulations and leadership and negotiation. The training will take place every six months.

This is a welcome development. We urge the Federation to evaluate this programme regularly to ensure that it meets the needs of branch officials.

We were told that it is becoming more challenging to recruit and retain reps because becoming a Fed rep is seen by police officers as very hard work which poses a threat to career advancement. Fed Reps, too often, do not feel recognised for the work that they are doing on their members' behalf. Fed Officers feel that they need more support to advocate and negotiate for their reps.

The branches we visited are acutely aware of the importance of Federation reps. They are seen as the 'face' and the 'voice' of the Federation at the workplace. Branch officials also aware that Reps are facing increasing challenges doing their Fed work and supporting members in the workplace and feel that the Federation nationally could give more support for reps, more central guidelines for the time and support that reps should receive from their line managers, and more and better rep training.

The workplace reps of today are the GS [General Secretaries] of tomorrow. Every quarter we hold a branch council meeting with all the reps. We update them on what's going on locally and nationally and get feedback from them about what's going on in their areas. They are part of the budget setting process each year.

The job of the full-time officers is to be strategic leads and to advise, guide and mentor the workplace reps. To make sure that they have facility time and the training and support to do their jobs.

The Federation reps we talked to were very proud of the work they did in support of members. They could see the value of what they did, and how their support was appreciated by the members in their workplaces. They also acknowledged that being a Federation rep was challenging and time consuming and, at times, confronted them with personal tragedy.

I joined as a rep in 2010. I took on a reserve seat at the time. So much has changed in a positive way. We focus on the members and fight for them. All the full-time officers sing from the same hymn sheet. They are approachable and I don't feel excluded from anything as a woman.

.....our Chair approached me at work and said we need a rep and you will be brilliant at it. I had served a lengthy period of mental health issues. I didn't think I would be able to do that, to assist people, to go to war for them. He asked me again six months later and I did it and I loved it. ... It's done my confidence a world of good. I love supporting people. I don't love the stress that comes with it. I have had two who have killed themselves on the job. That's hard.

The Federation used to be a quite a cushy number – it was seen as a jaunt. That no longer exists. It's not like that at all. Members don't see the amount of work you put in in your own time. Today's my day off but I've come in. Yesterday I was on leave and I was on the phone to a member for over an hour.

Branches told us that they were short of reps; that it was difficult to recruit and retain reps because becoming a Fed rep was seen by police officers as very hard work which posed a threat to career advancement.

We are so short of Fed reps that you end up picking up the jobs for other areas. There's not enough of us and we can't recruit because no one wants to be a rep. Officers don't know what the job entails. My relationship with my boss has deteriorated badly because of my Fed duties. She said that I have to run things by her and it's impossible and against regulation. Dealing with management – it's almost like you're using up goodwill to do the Federation role – you feel constantly in debt to the management.

A lot of people come in and do it for a few months and leave. We lost a third of the intake after a year.

The state of policing means that reps aren't getting time to do their work. They are being put under lots of pressure.

Reps are the Federation officials who are closest to the Federation membership. They are working with their colleagues, experiencing and understanding the causes of dissatisfaction and disaffection from policing felt by their members. The conversations we had with reps were the most informative we had in our regional visits. Reps are proud of the work they do. They know its importance. But they feel that the Federation nationally does not know what they do to support members, nor the issues that members want the Federation to work to resolve in order to improve their working lives (and so to improve retention rates in policing). They feel that their successes should be promoted and used as effective examples of the Federation working for its members and that the Federation nationally should provide opportunities for reps to meet each other and to feed back their successes to the centre.

I am doing really good work in my branch fighting for members under conduct investigations. Why does the Fed national not know what I am doing and learn from it?

The Federation should know about, collect and publicise examples of successful Fed reps.

Workplace reps are the face and the voice of the Federation in police stations throughout England and Wales. They are the first port of call for members who need support and advice when they face challenges and difficulties at work. Successful, democratic member organisations see reps as the most important, the most vital part of their organisation and do everything they can to attract, develop and support them, including professional support to enable branches to support reps, to communicate with them, and to give them the tools to do more, and better, for their members. They make sure that the issues raised by reps to branch officers are 'heard' at their centre – and that these issues are then supported by research and policy development and by key campaigns which demonstrate to the membership that their organisation understands their concerns, shares their professional aims, and has the capacity to make beneficial changes on their behalf.

Recommendation 3

The Federation should agree clear role descriptions for all branch officer posts, including Rep, Chair and Secretary and develop training to support officers in their roles. This training should be planned on a national basis, and delivered on a local basis, through branches and regions, and supported and developed by the Federation's newly created organising team (see recommendation 2).

- The Federation's rep training should be staged, to meet the needs of branch officers and reps at different stages in their career
- The Federation's rep training should be certificated to provide recognition to branch officers and reps about the training level they have achieved and, in reps' cases, the level of cases that they are trained to undertake, and on-going.
- The Federation's rep training should respond to current and emerging workplace issues being raised by the membership.

e. Issues raised by Federation Officers and reps in regional meetings

In our interviews we gathered a range of views on issues of concerns from members that could form the foundation of a campaigning programme by the Federation.

As a panel, we make no judgement on the evidence underpinning the perceptions of Federation officers and reps. We accept that other viewpoints may be equally or better informed and evidenced. However, we include the views and voices of Federation officers and reps at some length in order to paint a picture of their perceptions of the state of policing, and the state of the Federation – and in particular its ability to deal effectively with the challenges and difficulties faced by its members.

i) We were told of a recruitment and retention crisis in policing and its effects on the front line

As a public service, and like other public services, Branch Officers told us that policing is suffering from the effects of austerity including the loss of 20,000 police officers under the coalition and then Conservative governments. This has left fewer, and more inexperienced police officers to be the front line dealing with societal problems which are growing in number and severity. One told us: *'You can't get out of the cuts of 2010 which ripped out support for policing.'*

We were given a recent example of the failure to meet officer recruitment targets. We were told that the Met needs to recruit 400 or 500 officers every five weeks. At a recent (September 2024) event at Hendon there were 36 recruits.

Branch officials and reps had strong views on the working realities of policing which are the causes of the shortage of recruits, and the increasing wastage rates of experienced police officers leaving the service. We were told that the demands made on police are increasing both in volume and in complexity, but police officers are increasingly inexperienced and feel unprotected. The front line is being stretched.

Understaffed police forces must concentrate on front line policing, dealing with immediate challenges whilst longer term priorities, which could alleviate the demands placed on the police, are neglected:

'We have routinely had to prioritise 'boots on the ground' to deliver our core functions.'

Cleveland has a metropolitan workload with a rural budget. It was the most violent place in England last year- Hartlepool and Stockton and Middlesborough. There's a lot of drug crime and violent crime. Cleveland has the ports – a lot of drug importation. The supply of drugs in Cleveland is incredible compared with other parts of the country. A lot of drug crime, organised crime and county lines. But there's insufficient resources to deal with that. 2015 pro-active policing was dead, it is starting to be reintroduced but at the expense of reactive policing and response – we are robbing Peter to pay Paul.

North Yorkshire is a huge force. We are constantly moving officers around from Harrogate to Scarborough to hold the front line which is decimated.

- ii) We were told of the increasing complexity of police work, the increased media scrutiny of police officers and of concerns about the increasing numbers of police officers subject to misconduct charges.

Federation Officers told us repeatedly of the challenge to the Police service arising from the rise in mental health disorders. In particular, they talked of inexperienced police officers dealing with the stress of dealing with members of the public in acute states of mental ill health and distress:

Policing remains the only organisation that can't say 'no'. We are meant to be mental health experts now. We're not. We get bare bones mental health training, but we get vilified when it goes wrong.

Another common theme raised by Federation officers was the increased scrutiny of police officers, and in particular the widespread use of social media – recording and posting policing incidents which then subjected the officers concerned to intense, and not always well informed, media scrutiny.

Because Cops have got so much scrutiny, they can't police/ Body cams phones out, if I make a decision will I get investigated.

In giving these examples to us Federation Officers and reps stressed that the Police service must be subject to proper and rigorous accountability.

For them, it is not the issue of accountability per se, as the issue of fairness and justice which they believe is causing widespread disaffection and fear in the rank-and-file.

You are trying to do your job but you are afraid of doing the wrong thing and getting served. There was none of that when I first joined – you just got on with it.

- iii) We were told of high-profile cases which have led to a crisis in confidence in the ability of forces to regulate themselves effectively and further decreased the number of police officers available for front line duties.

Overwhelmingly, local Fed officers told us about the growth in misconduct charges. There is a widespread belief amongst them that managers and professional standards departments in forces, and the Independent Office for Police Complaints (IOPC) are too cautious in their decision making, too unwilling to determine the potential severity of a charge and to make decisions at the appropriate level. The result, Branch Officers argue, is that cases become escalated – what should be dealt with as misconduct becomes, too often, a charge of gross misconduct which carries with it the potential consequence of dismissal. This leads to long delays in investigations.

The view of the Federation officers is that the threshold for misconduct cases has been lowered and that cases which are being escalated to gross misconduct (rather than misconduct or learning – management advice and reflective practice).

We were told that the weight of misconduct charges is creating a huge workload for the Federation at local level and national level. Branches are supporting officers facing misconduct charges. We were told that the investigation period is lengthening – taking months and sometimes years.

We were told that the pressure on reps supporting members facing misconduct charges is huge. Members under misconduct charges can be reassigned to office work, or away from their specialist area, or may be suspended. Federation Officers reported that length of time taken to investigate causes immense stress. One rep told us of two members she was supporting had committed suicide. The effect on her was profound.

The forces are not reading the 2020 regulations as they should. My force was putting everything through as gross misconduct. They ramp it up for public perception. The misconduct process is brutal. Enquiries are going on for years. If you were a normal member of the public, you (would) get updates every 28 days.

The threshold for gross misconduct has been lowered. There are too many cases in the system. The IOPC conduct lengthy investigations. Attrition of the IOPC staff is a massive problem’.

As soon as an allegation gets made, even without evidence or due process, the cop is suspended for 6 or 7 months. A lot of cops under investigation are leaving in droves. The retention rates for police are poor. A lot of cops are younger and inexperienced.

To deliver against these concerns requires the organising and campaigning changes highlighted earlier, but also the ability to gather members’ concerns and professionally create an evidence-based foundation for such campaigns built upon the lived experiences of officers.

Recommendation 4

The Federation should establish a revamped professional policy and research department reporting to the Chief Executive but with a strong dotted line to the new General Secretary role to research the foundations for possible campaigns that deliver against issues of concern to members.

This department should work closely with the newly established organising team and the reformed communications department in order to establish a strong flow of information between the regions and the centre, and vice versa so that the policies and campaigns of the Federation are

- Well- grounded in member experience and sentiment
- Well-evidenced in terms of member experience, supported by evidence gained from various sources, including policy research, member surveys and focus groups

- where possible, Fed policies and campaigns align with other stakeholders in policing
 - so that they gain more traction and have a greater possibility of impact.

Section 2 – The culture of the PFEW

A recurring theme from our first report and in preparing this report is that of the culture of the PFEW.

We have been struck by a number of cultural dimensions which we have observed or been told about and which we believe are harming the effectiveness of the organisation in serving its members and at times creating environments in which people are struggling to work:

- The way members of the Federation at all levels at times talk to and about each other, which would not be acceptable in almost any other modern organisation
- The reports to us of a climate of fear created by the perception if not the reality of how disciplinary procedures are being deployed
- The observation of a highly authoritarian structure and behaviour of the Federation over a long period of time
- The divide between the centre and the branches

It may be that some of these reflect the culture of policing itself, that has come up in a number of reports over the years. In any event a failure to address the cultural changes required will undermine the effectiveness of other reforms we have recommended in both reports.

a. How people talk about each other

We referred in our first report to the freedom some individuals feel to express themselves in ways that would be regarded as unacceptable within almost any other organisation. It has been suggested to us that this is a wider problem within policing as a whole, but conversely, we have been told that if officers expressed themselves in such ways in front of senior ranks they would be facing disciplinary charges. Whatever the reason for this behaviour it has to stop. All officers within the Federation need to feel safe when they go about Federation business, not subject to discrimination, bullying or intimidation. Such behaviour needs to be called out wherever it is found, and subject to robust discipline as it would be within the police force as a whole.

But the language used within the Federation goes beyond that. We have heard Federation members talk of others as “dissidents”, “internal terrorists”, “villains”, “the enemy within”. Such disparaging and derogatory terms evidence a contempt for those of opposing views which is not acceptable within a membership organisation seeking collective action for the benefit of all members. The drawing up of camps and the isolation of those within opposing camps – on all sides – by such language makes the environment unsafe and forces dissent underground.

The other side of this behaviour is the use of social media to vilify others. The effect of this can be seen in the mental health of many of those who have stepped up to positions of responsibility. It will be increasingly difficult to persuade people to stand for elected office – or serve in crucial positions such as Chief Executive – if they are subject to the vitriol on social media that seems at the moment to be part of this organisation's currency.

We have also heard distressing claims of misogynistic behaviour within the Federation which we are told has had severe impacts on women police officers and Federation officers, undermining their work within the Federation and making it an unsafe and toxic environment for them. It is particularly worrying that a member organisation which fights for equality in the workplace faces allegations of unacceptable behaviours and attitudes which discriminate against women.

Another dimension of individuals believing they can operate outside acceptable norms is the cavalier approach to confidentiality in the operation of decision-making structures. Bodies such as the National Board and National Council need to be able to discuss and decide in an open yet confidential way. Dissent needs to be tolerated and indeed valued within the Board or such bodies but needs to stay within that body. Once a decision has been made collective responsibility takes over, and the Board/Council must be publicly united and not subject to leaks. It seems bizarre to have to reiterate this given it is such a basic tenet of the operation of any board, but it seems necessary to do so in the Federation. Breaches of such norms would elsewhere often be considered a serious disciplinary matter which would bring into question whether an individual is fit to serve on the body concerned.

b. Disciplinary procedures employed in the Federation

An important aspect of the culture of the Federation is illustrated in its use of disciplinary processes and procedures. Every organisation needs internal disciplinary procedures which ensure that poor behaviour which goes against the ethical standards required is properly investigated and, if necessary, properly dealt with.

The concern expressed by branch officers about the rise in misconduct cases in policing is being mirrored within the Federation by what is perceived by some to be an excessive and inappropriately punitive use of disciplinary procedures – and in particular the use of Appendix 9 of the Federation's regulations.

We received evidence from the Federation nationally detailing the incidence of the use of Appendix 9. In 2024 the Federation received 30 complaints from members against Federation representatives – down from 47 complaints in 2023.

Of these complaints, 4 led to suspension of the representative pending investigation (in 2023, 11 reps were suspended).

Most complaints are from members regarding lack of representation at branch level – these range from service issues through to more fundamental claims of a complete failure to support, a refusal to support or discriminatory treatment towards a member by their local branch.

At the start of 2024 the Federation appointed governance lawyers to support fairness and consistency in the application of the process of Appendix 9. The reason given to us for this decision was that panel members, who currently are elected Federation representatives, were basing their decisions on the internal politics of the Federation, rather than applying the policy consistently.

In this new process independent investigators produce a report which makes recommendations about whether the complaint should be dealt with by the relevant police standards department, if there is a breach of conduct regulations or criminal findings, or by the Federation's Ethics, Standards and Performance Committee (ESPC) if the complaint is against a member in their role as a Federation Officer. This panel may also recommend whether the member should, or should not, be suspended during the process of investigation. Other possible outcomes are that the member is required to undertake reflective practice with a plan to improve their performance.

We acknowledge and note that fewer Appendix 9 cases have been taken in 2024 than in 2023, but we are, nevertheless, concerned about aspects of the Federation's disciplinary procedures. It appears to us that in many we interviewed there is a real fear of 'being served' an Appendix 9 notice, and that many branch officers - and some national officers we spoke to - were genuinely concerned about the appropriateness of its use.

The perceived misuse of Appendix 9 was an issue raised with us in every meeting of branch officers. The observation they made was that Appendix 9 was being routinely misused, not to investigate and, if appropriate, discipline Fed officers who have fallen foul of the standards required by the Federation, but to silence critics of the Federation's CEO and national officers. They reported a fear amongst National Council and National Board members themselves that if they spoke out they would be served an Appendix 9 notice and sent *'back to uniform and back to shifts – it's a big change for you overnight and it's a big fear.'*

Other statements made to us were that *'Appendix 9 is being used to shut people up'* and *It's a bizarre governance process. People are being silenced and served papers basically to shut them up.*

We are not able to comment on individual cases or even whether the fears expressed around the use of Appendix 9 have any foundation, but the concern of many branch officers cannot be ignored.

Member organisations vary in whether they employ independent investigators, and this may be connected with the nature of the profession from which the membership arises. We have identified two different approaches.

In teachers' unions, for example, the investigation of the complaint is undertaken at the formal hearing, if the case progresses to that stage, where the complaints panel is advised by the union's in-house lawyers.

Conversely the BMA - the doctors' union – does employ independent investigators to conduct an initial investigation into the complaint and to make recommendations about whether there is a case to answer.

But a common point amongst the disciplinary process of both the teacher unions and the BMA is that National Executive (in the Federation's case, National Board members, and National Council members) are not involved in the conduct of disciplinary processes. This is because the temptation - whether realised or not - to make judgements based on who you know rather than what they have or have not done, is perceived to be too strong.

In order to uphold the integrity of the process and the judgements made complaints panels in these instances are comprised of a pool of grassroots members who do not hold a national role in the association's structures. These rank-and-file members are elected, usually at annual conference. Panels are constructed to reflect equality, diversity and inclusion good practice.

In this way these member organisations avoid the risk of decisions being made for the wrong reasons. Panel members must recuse themselves from hearing a case if they have had personal or professional relationships or dealings with either the subject of the complaint or the complainant.

Recommendation 5

The Federation centrally should provide the clearest possible guidance on the purpose and operation of Appendix 9 and regular updates for the regions and branches on the number of cases being investigated and the number of suspensions pending investigation and resolution of the complaint.

We also find that the Appendix 8 standards need further explanation on the ‘core principles of the Police Federation of England and Wales’. Currently these are too open to interpretation to act as a useful guide to officers in their behaviour. Case studies should be generated which illustrate what is meant by the phrase ‘exemplary standards of conduct, integrity and professionalism’. The case studies should clarify what counts as proper debate on professional issues within a member organisation and what actions and behaviours fall short of these standards and would result in the serving of an Appendix 9 notice.

Recommendation 6

The Appendix 8 standards should be used as a basis to generate case studies of actions and behaviours which would result in the serving of an Appendix 9 notice.

These case studies and guidance should exemplify what actions are a proper function of the Federation’s democratic processes in the support of free speech and defence of Federation members, and what are not appropriate and would result in the serving of an Appendix 9 notice so that Federation officers regionally and nationally can have a much clearer understanding of the legal and ethical parameters of their work and know when, and from whom, to seek guidance in what are, often, complex issues.

Recommendation 7

Given the concerns about the operation of Appendix 9 we recommend that the Federation creates a complaints panel of rank-and-file members to hear cases and make judgements, with support from external specialists where appropriate.

c. An 'authoritarian' organisation.

As we have said, a membership/trade union organisation needs to operate in a way that tolerates more disagreement than would be acceptable in a commercial organisation. The leadership of such a body is not an easy task. The Federation has historically been led by authoritarian figures in the form of National Secretaries who, in the words of one, saw themselves as “the king of the castle”. This is perhaps a reflection of the ‘command and control’ nature of the likes of the police force. Yet such an approach is hard to reconcile with the needs of a body such as the Federation, comprising members of different views which need to be tolerated and indeed championed. The Federation needs a General Secretary who can lead the organisation in the public mind but build support and agreement from within the membership, together with a Chief Executive who can manage the organisation and shepherd its resources in an efficient and effective way, whilst recognising they do not have the legitimacy and consequent authority of an elected officer in a democratic body. This is not to say that the Chief Executive need be a police officer. Indeed, it may well be helpful that they are not, for then there is no competition for the ‘legitimacy’ described. An authoritarian leadership style in either role may deliver great benefit in the short term but will ultimately alienate the diverse membership on whom the organisation depends for success.

d. The centre and the branches

In our first report we touched on the issue of the divide between the centre and the branches, that the Federation often seems to be not one organisation but 43+1. Until all in the Federation see themselves as part of one organisation then at a minimum it will not be as effective and impactful as it could be, and in all probability the infighting that results will seriously erode its ability to operate at all. Neither part of the organisation is better than the other, or more important. They each have different but equally crucial roles to perform to enable the Federation as a whole to thrive on behalf of its members.

The centre is best placed to develop policy positions informed by research and crucially the experience of members locally and craft these into coherent, actionable, time framed and realistic campaigning demands appropriately resourced, which are then delivered by a combination of national and local campaigns within the context of a communications strategy devised centrally but implemented both centrally and locally. It is best able to develop the strategic direction of the organisation, bringing the experience of professionals to bear whilst alive to the wishes of members locally. The centre is also in the best position to manage the

resources of the organisation and maintain good control of finances to the benefit of all members.

The branches are able to effectively defend members through disciplinary processes, drawing on the particular expertise of the centre where needed and providing the centre with insights as to recurring themes in disciplinary procedures which can be considered as the subject of campaigns. The branches are also best placed to draw out the experience and perspectives of members for passing up to the centre for debate and discussion. They are also the part of the Federation that can identify discrepancies in behaviour for good or ill between forces. The branches can also make campaigns come alive, involving members in securing the organisation's demands.

In this new relationship the Federation has to resolve the issue of finances. As was seen in the first report, the consequences of legal actions around the pensions dispute has all but exhausted the finances of the centre and, together with possible outcomes of the data breach claim, severely hamstrung the ability of the centre to fulfil its role in the future. Subscription fees are now collected by the centre and in part distributed back to the branches to meet their budgetary needs. Yet some branches still hold accounts unconsolidated within the Federation national accounts which enable branches to conduct activity independently of the other parts of the organisation. This creates the unacceptable situation where the services delivered to a member depend on the branch within which they work. The governance of these accounts is also complicated. They are often accounts holding the proceeds of branch group insurance schemes, which cover Federation members and other police officers, staff and their families. They may be set up as trusts independent of the Federation branches themselves, yet Federation branch officials are often trustees and they have been used for various purposes which have related to Federation activities (such as the purchase of a building) or the general provision of services to police officers, such as welfare vans.

Group insurance schemes are a highly valued benefit to members (and others) and the funds raised by them passionately defended by branches. The benefits (and costs) of such schemes vary by branch, and again create an environment where membership benefits differ according to the force an individual member serves within. The commissions paid to branches also vary by provider, and are negotiated at a local level. Small branches (with as a consequence small schemes) are naturally at a considerable disadvantage in this respect. The Federation should examine whether for future joiners branches would secure greater benefit to their members by coming together to provide regional schemes or a national scheme.

We have also heard serious allegations from a number of members and external stakeholders about the financial governance of some of these local resources, and the discouragement of

any attempts to probe practices and behaviours. We are not in a position to comment upon individual cases, but we recognise the importance of effective financial controls and independent governance, and that their lack leaves opportunities for poor behaviour. We therefore recommend changes to the oversight of branch accounts and governance.

The Normington Review called for branch accounts to all be declared and combined in the national accounts – largely for reasons of transparency and good governance – but this has not fully happened.⁴ We repeat this recommendation.

Recommendation 8

All branch accounts should be declared and reported in the national accounts. Indeed, we would go further and urge the Federation to consider whether these resources could and should be combined with those of the centre to create one transparent resources pot to be deployed in accordance with organisational objectives. This should be a project supported by the Board with external input on the legalities, involving National Council members and branch officials too. In addition, the Federation should consider providing for future joiners regional group insurance schemes or a national scheme to secure the economies of scale that such a scheme could potentially unlock.

Recommendation 9

Branch accounts should all be audited by the same firm auditing the national accounts.

At present there are 43 branches because there are 43 police forces. Whilst there are some powerful branches, there are also those which are financially weak and vulnerable. We question whether matching the branches to police forces is the best model for the Federation and delivers the greatest impact for its members. We recognise that this would pose considerable upheaval for the Federation and legislative change, but we would strongly urge serious consideration of a move towards regionalisation as a significant element in its reform. We believe that 8 regions replacing 43 branches would constitute a more powerful force in negotiations with employers and would provide a better career route for Federation officials, recognising the additional responsibilities and training that would be required.

⁴ Normington review, p. 20

We also understand that Branch constitutions differ from each other and from the national constitution. We see no reason why this should be the case and urge the Federation to consider the alignment of national and local constitutions.

Recommendation 10

We urge the Federation to consider whether a regional rather than branch model of organisation would create greater parity between member areas, greater ability to resource locally and more powerful interactions with Chief Constables.

Section 3 – The governance of the federation

One of the clearest observations we have made in our discussions over the period of this review is that not only did the corporate governance framework fail the Federation during the pensions dispute, but it is still not adequate to enable the organisation to work effectively. Roles are not well-defined, the interaction between them is confused and at times opaque, and the process for populating the corporate governance framework is not fit for purpose. The Normington Review made a number of recommendations in this sphere – some but not all of which have been implemented – but they have not sufficiently improved the situation, and some have made things worse.

The key elements of the current national governance framework are the National Chair, the National Secretary, the Chief Executive Officer, the National Council and the National Board. We shall consider each of these in turn.

We talked in our first report about the importance of tenure limits to ensure a freshness of approach, prevent the sense of ‘jobs for life’ in senior Federation roles, and ensure individuals remain connected to the pressures faced by officers on the front line.⁵ This was also a recommendation of the Normington review, but was rejected by the Federation.⁶ We consider the adoption of our recommended changes in this regard to be an essential first step in reform of the governance of the Federation.

a. General Secretary

The National Chair was intended under Normington to be the “voice of the members and branches”, bringing this voice into the National Board.⁷ Our first report concluded that successive National Chairs failed to do this during the pensions dispute. They have also often seen themselves as somehow more legitimate than the National Secretaries and others, on account of being directly elected by the membership, and some have used this platform to put forward their own views publicly in contradiction of the views expressed by the Federation as a whole.

⁵ ‘Look Back’ report, p.36

⁶ Normington report, p.18

⁷ Normington report, p.45

We see no need for a National Chair, National Secretary and Chief Executive Officer. One person needs to represent and be the voice of the membership, another needs to bring the professional expertise in running the organisation, delivering strategy and implementing policy. The third role is superfluous.

We propose the creation of a new role of General Secretary (GS), directly elected by the membership, to replace both the National Chair and National Secretary roles. They conduct public facing activity on behalf of the Federation being the members' representative with government, media and other stakeholders.

It is important that in creating this new role the Federation does not slip back into the bad habits of the past with an authoritarian leader dictating to other parts of the governance structure. The General Secretary has to work in close cooperation in particular with the National Board – who have to actively hold them to account – and the Chief Executive Officer, who is the executive head of the organisation. They are a leader not a dictator.

In summary, this encompasses elements of the current National Chair and National Secretary role:

- They are the voice of the membership, and thus directly elected by the members.
- They conduct public-facing activity on behalf of the Federation, being the members' representative with Government, the media, and other stakeholders and conducting negotiations over pay and benefits.
- They are the leading voice and face of the Federation's campaigns and policy proposals, ensuring that these are grounded in solid evidence, adequately resourced and executed effectively on behalf of its members.
- They chair the National Council and the National Board, setting the agendas for both bodies.
- As in most organisations, they are the administrative line manager of the CEO, being a channel of communication between the Board and the CEO, conducting the CEO's performance appraisals (after receiving input from others) and holding regular one to ones with the CEO to discuss current Federation activity and plan forthcoming board meetings.
- They manage the Company Secretariat, ensuring that minutes of Board and other meetings are an accurate and fair record and matters arising are dealt with by the CEO.
- They have to have previously served as a Branch Chair/Secretary/member of the National Board and be qualified against the person specification outlined in the job description to be able to stand for election.

- They should serve for a period enabling the accruing of experience but not so long as to 'dominate' the organisation or become out of touch.

They should be supported in this onerous role by an enhanced role of Deputy General Secretary. The role is intended to deputise for the General Secretary should they be unable to fulfil their duties for a period of time and take on other specific work allocated to them by the General Secretary. The role could be seen as a 'training ground' for possible future General Secretaries.

Recommendation 11

The National Chair and National Secretary roles should be abolished and replaced by a new role of General Secretary. They should also have a tenure limit, of a maximum of one 5-year term with the possibility of serving a further 3-year term. This ensures they retain a direct knowledge of the issues facing front-line police officers and don't become 'institutionalised' by protracted periods at Head Office, whilst still giving time for them to gain the experience valuable in executing the role effectively.

Recommendation 12

A revised Deputy General Secretary role should be formed as outlined above, with a tenure limit of two four-year terms

Recommendation 13

The roles of National Secretary and National Chair should be abolished in 2028 at the end of the next period of office.

Incoming General Secretaries should be provided with training and development support on election. This could take the form of shadowing the outgoing General Secretary, formal training and the provision of an Executive coach.

b. Chief Executive Officer

We have heard from almost all those interviewed a desire to ensure the organisation is run professionally, and a recognition that the skill sets and experience this requires are not automatically held by a police officer. We therefore see the value in appointing a CEO who is

not necessarily a serving police officer, provided their role is clearly defined and they understand and embrace the culture of a membership body such as the Federation.

We have, during our year's association with the Federation, observed the vital role played by the current Chief Executive Officer in 'landing' the settlement of the mass Employment Tribunal claim which was brought following changes to the pensions arrangements and currently in leading the Federation's legal and financial response to the data breach claim. Individually, and taken together, these legal challenges pose an existential threat to the Federation. The professional experience and expertise of the CEO has been vital to the Federation's efforts to ensure its current and future viability.

Some branch officials were strongly supportive of what they saw as the necessary and overdue professionalisation of the Federation. They told us that the past troubles of the Federation, culminating in the tribunal judgement, were the result of police officers trying - and failing - to competently run a multi-million-pound business.

Other branch officers we talked to in our regional visits raised objections to the position of the current CEO, complaining of their lack of experience as an officer, the manner of their appointment, and the lack of transparency over their remuneration.

This was perhaps the issue on which opinions were most divided amongst Branch officials themselves, and between those branch officials who have concerns about the CEO's appointment, role and function, and those who support what they see as the professionalisation of the Federation in the light of what they think is the former amateurish running of the Federation which is linked strongly in their view to the Tribunal judgement.

Supportive Board and regional officers credit the current CEO with bringing a laser focus on necessary changes to the Federation and are confident that the current leadership of the Federation are well positioned to navigate it through ongoing governance issues.

But even amongst officers who support the current CEO, there are questions about the CEO role, the process of his appointment, and his remuneration.

Amongst such supporters there are also concerns that the Executive function is seeping into what should be democratic decisions as well as the absence of a leading police officer – the Chair and/or the National Secretary – to speak publicly on the professional concerns of police officers.

It is important to note that in some regions and branches there is also strong opposition to the role of the CEO, its function and the lack of division between governance and business functions in the Federation.

Direct quotations from members and officials giving a sample of the range of views expressed during our interviews are listed in Appendix 2.

As we have previously indicated, we do not see the lack of direct policing experience as a bar to the CEO's appointment provided they match the other needs outlined in the person specification. We understand why the National Board at the time of the current CEO's appointment felt that the serious position of the Federation and the crises it faced made a swift appointment of the Chief Executive Officer the only viable route.

In the future, however, we would recommend that the crucial nature of the CEO's role would warrant a formal appointment led by the Nominations Committee (to be discussed later) together with an approval process that ensures the CEO has support from the governance structures of the Federation.

Recommendation 14

The CEO role in the future to be made following a formal process led by a newly created Nominations Committee of the Federation and consisting of external advertising and formal interviews. The appointment should be approved by the General Secretary (as the representative of the members) and the National Board. Consent to this appointment should also be secured from the National Council.

We have heard a great deal of comment on the remuneration of the CEO. It is not for us to comment on the amount of remuneration, but rather on the process of governance surrounding it. Currently it is perceived by some as a deal done by the current National Secretary with the CEO, reported to the National Board and then not communicated to the wider organisation. It has been pointed out to us, however, that the salary was benchmarked by an external firm and that reported to the National Board who then agreed the remuneration package. In any event it has become a running sore in the organisation, with speculation as to the quantum and much debate over its appropriateness.

In public organisations it is now commonplace for a great deal of transparency to surround the setting and communication of the remuneration of senior staff, and for it to be based upon independent market assessment by benchmarking consultants. A Remuneration Committee on which the CEO does not sit and of which the General Secretary is not the chair of the committee gives a further demonstration of the independence of the process.

Recommendation 15

The remuneration of the CEO and other senior executives should be set by a newly created Remuneration Committee on the recommendation of the General Secretary in the case of the CEO and the recommendation of the CEO in the case of other senior executives, with support from qualified benchmarking consultants. The CEO's remuneration should be approved by the National Board and the structure reported to the National Council for discussion on a triennial basis. The amount of remuneration should be reported annually to the National Council and disclosed in the Annual Report and Accounts.

In essence, their role is to be the professional running the organisation for the benefit of its members:

- They represent the organisation externally on matters regarding its finances, strategy and corporate governance.
- They are the executive head of the organisation, leading all staff in HQ and the day-to-day business of the organisation.
- They should ensure that the internal discipline processes are managed effectively and fairly according to the processes set out in recommendations 5-7 of this report.
- They manage the communications function of the organisation, crafting policy positions set by the General Secretary and Board into effective communications disseminated nationally and locally.
- They oversee the budgeting process, manage day-to-day expenditure with the Finance Director, and propose annual budgets for approval by the National Board.
- They oversee the strategic planning process of the Federation, working with the General Secretary to develop a strategic plan and securing its approval and then being responsible for its implementation.
- Like all CEOs, they are accountable to the Board as a whole but have an administrative line manager in the General Secretary.

Normington also recommended specific roles to serve on the Executive Leadership Team.⁸ We are not inclined to do so, as it is for the CEO to shape the team they believe is needed at any particular time.

⁸ Normington Review, p.17

c. National Council

We find the current role of the National Council rather confused. We have shown in our previous report that the National Council performed no better than the National Board in holding the senior leadership to account and promoting the views of a significant proportion of the membership. It is a very large body (around 100 members), which makes decision-making extremely difficult and promotes speeches rather than discussion. Many have complained that the agendas are now rather thin, not justifying the time and cost commitment of the meetings.

In our view the Federation does not need another decision-making body. What it needs is a (much smaller) reference body which can articulate the views of the membership and advise the senior officers and Executive on issues brought before it. Its function should be to ascertain the views of members through meetings, surveys and the like and then bring those perspectives to bear on issues presented for debate. These issues should be the likes of policy positions and campaigns on issues which affect the membership as well as the formal approval of the appointment of the General Secretary and the CEO.

As their role is advisory not decision-making, we see no need for them to meet other than intermittently. These roles do not need to be full-time and should be paid a small honoraria determined by the Remuneration Committee.

Recommendation 16

The function of the National Council should be changed, being to ascertain the views of members through meetings, surveys and the like and then bring those perspectives to bear on issues presented for debate.

Recommendation 17

The National Council should be radically reduced in size to facilitate effective debate. It should comprise 3 representatives from each of the 8 Regions (directly elected by the membership and not automatically Branch Chairs or Branch Secretaries) together with the General Secretary and up to 3 other members from protected categories or to ensure all ranks are represented. The CEO should attend Council meetings.

Recommendation 18

We recommend the National Council continues to meet 3 times a year.

Recommendation 19

Again, we see it as important that these roles are not regarded as ‘jobs for life’. We therefore recommend tenure limits for National Council positions of two 4-year terms.

d. National Board

The National Board members we interviewed perceive that the Board is undertaking a significant change process which is focused on good governance, transparency and the better operation of the Board’s governance and fiduciary duties. They believe that the governance training they have received through the ‘ways of working’ programme has enabled them to work more cohesively as a Board and with greater transparency and openness. Some mentioned the practice of declaring conflicts of interest as a standing agenda item at the start of Board meetings as a concrete example of new ways of working to support transparency and integrity.

For the first time the Board is doing what it should do. In the past it’s been a tick box.’

We’ve moved away from the past shenanigans

The Board members we interviewed acknowledged the mistakes of the past which led to the tribunal judgement and believe that the right structures and processes have now been put in place to ensure that the Federation is never placed in such a position again. They told us that they were kept out of the information loop and legal advice which underpinned the Federation’s stance in the light of the legal challenge against the government on age discrimination. They acknowledged that this was wrong and accepted that they should have done more to demand that they were involved and to recognise their governance duties in this essential regard.

Board members we interviewed were strongly supportive of the Federation’s current CEO and the professionalisation of the Federation’s leadership. They felt that things are now moving in the right direction and that safeguards were now in place to ensure that the Federation was not again exposed so badly to legal and reputational damage.

They felt that they were accountable to the membership, whilst acknowledging that more could be done to communicate the work of the National Board to the Federation’s National Council and membership. They felt that their work was more transparent and that they had closer working relationships with members and activists.

We observed a National Board meeting at the Federation's headquarters in Leatherhead. We witnessed a well chaired meeting with sustained and knowledgeable interventions from National Board members who clearly were well acquainted with the issues faced by Federation members. The atmosphere was constructive and there was a clear sense of the Board pulling together to understand and address the issues faced by Federation members. There were reports from the Acting National Secretary on the Federation's evidence to the Police Pay Review body, and on member opt out from the police pensions scheme which were well informed and generated interested discussion.

We did note that confidential papers were distributed at the Board meeting, with numbered copies which were returned after the relevant agenda item had been discussed. We understand that there have been serious leaks from the Board in the past and, apparently, in the recent past. In this report (p.23) we have emphasised the need for confidentiality of Board discussions of sensitive issues, including the Federation's finances and the legal challenges against it, and the need to foster an understanding of, and agreement to, collective responsibility for the Board's decisions.

The Board should be supported in moving to a position where it is understood that particular facts and issues are confidential to the Board and should not be discussed externally to the Board. If there are leaks, then these should be investigated and disciplinary action taken against those who are doing the leaking.

The Board should move to a situation where confidentiality is assured. In that case the need to distribute papers during the meeting, which necessarily limits detailed discussion and debate, will no longer be necessary. The Board's decision making on complex and important issues will be greatly assisted by this approach. Board members will be given the time to consider the issues carefully, and to come to evidenced positions on the issues under consideration.

We noted, also, that whilst the Board discussions were well conducted, too much of the time spent in the meeting was information sharing with too little consideration of what actions should accrue as a result of Board discussions. Whilst it is completely understandable that Board members will bring the views and issues raised by their regions to the meeting, the focus should be on what actions should be taken by the Federation nationally and locally to deal with these issues. This does not mean that a long list of 'action points' is generated from each meeting - but it does mean that Board members are clear about where the issues raised are taken forward within the Federation's structures, and what actions they should take in order to support and further the Federation's campaigning and policy work.

We note that the minutes of the Board meetings are very detailed with regard to the issues and discussions during the Board, but not sufficiently clear on the outcomes of those discussions and the actions accruing from them.

Whilst it is clear that very significant progress has been made in the conduct of National Board meetings, it is also the case that National Board members' views of their role and their contribution to the Federation were not shared by all the branch officials - usually Chairs and Secretaries - that we met during visits to all the Federation's regions. A key theme to emerge from the conversations we had with regional officers was the discontent and disappointment that they had in what they perceived to be the isolation of the National Board from their work in the branches, and from the professional concerns and issues that their branch members are facing in the workplace. It remains the case, as it was reported in Normington in 2014, that *Branch representatives are distant from the national level decision-making and do not feel brought into national level strategies.*⁹

The divide between the National Board, the regions and branches means that it is difficult for the Federation to identify and then articulate the key concerns of its membership, and then to campaign effectively on its members' behalf. Normington made a division between the Federation serving the public good as well as members. We would not make this distinction. If the Federation were able to raise the status of policing, through voicing and campaigning on the issues which affect the recruitment, retention and calibre of police officers, then it would serve the public good by raising the status of, and justifiable confidence in, the police force.

There is a bit of a disconnect between national and local. The perception is that the national don't really care about how the branches operate, they just want the national to operate. Members won't have a bad word to say about their local Fed – but with the national Fed they perceive inactivity. The pension matter doesn't help.

We should not have a national board of 24 people. There are board members taking on leads and I think, do we need a lead on that? Lead on welfare vans, deputy lead on health and safety, training and something else. You get the impression that there's someone up there trying to get leads to keep their jobs.

We have no regular contact with the region's national board reps. Once a quarter the national board reps come to a meeting but generally, they don't know what they are doing. We don't hold them to account. I have had to pester them to send me Board agendas and minutes so that we can give them our feedback on the items being discussed.

⁹ Normington Review, p.13

It feels like two separate operations – I'm content with that as long as nothing they do nationally prevents me from what I have to do locally.

The last quotation, from an interview with a Branch Secretary, encapsulates in our view the limitations that the divide between the National Board and the branches places on the Federation. It should not be the case that the Board is to be tolerated as long as it does not, in the view of the Branches, 'prevent' the branch from doing its work locally. The Federation should be working as one organisation, with the national and local in frequent and regular communication.

Joint programmes of work should be devised, based on the needs of the membership, worked up into policy and campaigning positions driven forward by the Federation both nationally – with policy and operational stakeholders, and the media influencing public opinion, and locally – involving Federation officers and members, in working towards a common goal.

We also heard of persistent conflict between some Branch Chairs/Secretaries and the regional representatives on the National Board, with the former seeking to mandate the latter to support particular positions or secure changes that benefit their region even if these are bad for the Federation as a whole. We see the National Board regional representatives as exactly that – representatives, not delegates. Their job is to bring the perspectives of their region to the Board table, not to fight for the particular interests of their region.

The role of the National Board should be to hold the CEO and the General Secretary to account, to oversee the strategic operation of the organisation, and to ensure compliance with appropriate legislation, regulations and good practice. It failed in all of these respects during the pensions dispute, intimidated into compliance by over-powerful National Secretaries. Our view is that, as with the National Council, it is also too large for effective decision-making. In line with other Boards it should comprise 12-15 members - 1 member from each region together with the General Secretary, Deputy General Secretary, up to 2 others from protected categories or to ensure representation from all ranks, the CEO, and 2 independent NEDs from outside the police force. In choosing members care should be taken to ensure that one region does not dominate the Board. The National Board candidates should be reviewed against the person specifications by the National Committee, then 'approved' candidates appointed by the National Council.

It should not be possible to serve simultaneously on the National Board and the National Council, but it should be possible to move from one to the other with a 'break' of perhaps 2 years – to enable valuable experience to be retained but to prevent the sense of 'jobs for life'.

Recommendation 20

The role of the National Board should be redefined as outlined above. Individuals should not be able to serve simultaneously on the National Board and the National Council.

Recommendation 21

The National Board should be reduced in size to 12-15 members comprising regional representation, the General Secretary and Deputy General Secretary, the CEO and independent external Non-Executive Directors, plus those from protected categories as required.

Recommendation 22

We recommend the appointment of 2 Independent Non-Executive Directors (iNEDs) as full members of the Board. One of these should be an individual with extensive senior leadership experience in HR and equalities issues who would chair the Remuneration Committee and another with the same in finance and audit matters, who would chair the Finance, Audit and Risk Committee (discussed later).

Recommendation 23

It is again important that regional members of the National Board retain a connection to the pressures of front-line policing, as well as seeing these roles as a time-limited contribution not 'jobs for life'. We therefore recommend a tenure limit of two four-year terms.

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It should be the decision of the General Secretary which papers are to be presented to Board members during the meeting for confidentiality, and which papers should be distributed to Board members prior to the meeting in order to generate the most informed and considered response.

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Recommendation 26

To maintain the important connection to the regions National Board members should be appointed by the National Council on the recommendation of the Nominations Committee who have assessed that they match the person specification for the role. The regional representatives should be chosen from amongst previous or current Branch Chairs and Secretaries from the region they represent.

A number of people have suggested to us that National Board members should not be full-time, again to ensure they are tied into the experiences officers face every day. We do not see this need – indeed believe this raises issues around availability and pressure on them from the force in which they serve - provided they are time-limited appointments as recommended. We also note that some National Board members choose to take shifts in their police force to maintain contact with members and the problems they face and would suggest ways should be explored to encourage this and enable it to happen in terms of workload.

The current process of remuneration for Federation officers is the highly complex ARP system. This evaluates roles of National Board member, National Chair, National Secretary and National Treasurer against established rank of police officer and pays a supplement based upon the incumbent's current pay point within that rank. This results in the enhancement for being a National Board member (evaluated as equivalent to a Sergeant) being different depending on the incumbent's rank and point within that rank. For example, a pay point 3 Constable would be paid £15,020 extra whereas a point 3 Sergeant would only receive an additional £3,696 for doing the same role. Similarly, the National Secretary role (evaluated as equivalent to a Chief Inspector) would involve an uplift for a point 3 Sergeant of £24,037 but only £8774 for a point 3 Inspector. We would question this differential, as well as the overall level of supplement for national roles which involve a great deal of additional responsibility and which are currently paid significantly below the levels for comparable union organisations.

Recommendation 27

The Remuneration Committee should explore the question of remuneration of National Board members and consider a fixed and common honoraria instead of the current remuneration arrangements. It should also reexamine the overall level of additional remuneration for national roles. The General Secretary and Deputy General Secretary, as the democratic leaders of the Federation, should receive remuneration in line with the responsibilities and demands of this role benchmarked against similar positions in other member organisations.

Members of the National Board all hold portfolios, which are executed to a greater or less effective extent depending on the individual. We are not convinced of the need for such an extensive list of portfolios to be held by National Board members but would recommend reviewing which are necessary and which could best be done by others (such as by a locally-based officer on behalf of the national Federation). Again, in other organisations – particularly commercial ones – leading on a topic (akin to chairing a committee) attracts an honorarium.

Recommendation 28

The list of portfolios of National Board members should be reviewed to determine which should be retained by the National Board, which could be done by local officers on behalf of the National Federation and which should be done by professional staff.

A majority of the new National Board members represent a particular region, bringing that region's perspectives on matters before the Board into a meeting and also disseminating the Board's decisions to their region and assisting the region's staff in implementing them. Connections between a region and its National Board member are therefore vital.

However National Board members hold a duty towards the Federation which goes beyond their regional representational role. It must be clearly understood that their duty as governors of the Federation goes above their responsibility to promote their region's views. National Board members must consider the needs of the Federation as a whole. A key part of their role in the new structure is to disseminate the decisions of the National Board to the region and to

support the Branch Secretaries and Chairs in their implementation. Connections between the regions and their National Board member are, therefore, vital.

Recommendation 29

National Board members must maintain a strong connection to the region they represent and so should remain working or resident in that region, preferably based in the regional office and travelling to other locations for National Board business as needed.

To facilitate a greater sense of the National Board being founded on its local connections Board meetings should also alternate between regions. Ideally regional Board meetings should not always be held in the same regional location. The Board should take the opportunity to spend time and learn about the regions in which they are holding the particular meeting.

Recommendation 30

Board meetings should alternate between regions.

Recommendation 31

Board members should chair a quarterly meeting with National Council members in their region, and with Branch Chairs and Branch Secretaries, to hear their views and experiences of the issues facing members in their region to inform their decisions on the campaigning, organising and policy positions adopted by the Federation.

e. Sub-Committees of the Board

The Federation is unusual in not having sub-committees of the National Board to handle more specialist areas in greater detail, bringing expertise to bear and freeing up time for the Board as a whole. We would propose three such sub-committees, all of which report to the National Board:

i. Nominations Committee (NomCo)

The NomCo determines the person specifications for senior positions (members of National Council and National Board, General Secretary, Deputy General Secretary, CEO). It determines whether individuals meet the person specifications for appointment for national roles, without fear or favour. It conducts the appointment process for the CEO, deciding whether to use external head-hunters and overseeing the process. It would agree the interview panel composition for the CEO recruitment, which should include the General Secretary and the Chair of RemCo.

Nomco should be chaired by the General Secretary, and in addition include the Chair of RemCo, a National Council member and 2 other members of the National Board (one of which should be the CEO). The General Secretary should also be absent for discussions of matters affecting their own role.

ii. Remuneration Committee (RemCo)

Remco determines the remuneration (structure and amounts) of the CEO and of other senior Executive Leadership Team members, the latter on recommendation from the CEO. It recommends the CEO's remuneration for approval by the National Board.

It should - in line with the UK Corporate Governance Code - not be chaired by the General Secretary but, we would recommend, by an external iNED with senior experience as outlined above who has also been a Non-Executive Director elsewhere and ideally chaired or at least been on a RemCo to ensure they understand the non-executive specific nature of their role.

The CEO should not be a member of RemCo but attend for discussion of remuneration matters affecting the senior executive team.

iii. Finance and Audit Committee

This committee scrutinises the financial governance of the organisation (at a local and national level), the preparation of the annual report and accounts and the audit of the same. It works closely with the CEO and the Finance Director in performing this role. It challenges the annual budget, which it must approve before submission to the National Board for final approval.

It also oversees the high-level risk function for the Board, a process which hitherto has been sadly lacking in the Federation for many years and is now in place. In this role it would approve the risk register and mitigations for submission annually to the National Board.

In addition, it would oversee the internal and external audit functions of the organisation, challenging the executive as necessary and ensuring compliance with statutory and regulatory requirements as well as good practice.

The Committee would be chaired by an external NED who has senior Board-level experience in financial management or audit and preferably a qualified accountant. They would have been a NED before to ensure they understood the non-executive nature of their role, and ideally been on an Audit and Risk Committee before. The remaining membership should comprise members of the National Board and 2 members of the National Council, with attendance from the CEO and the Finance Director.

Recommendation 32

Three subcommittees to the National Board should be constituted: a Nominations Committee, a Remuneration Committee and a Finance and Audit Committee with the functions and membership outlined above.

f. National Treasurer

Changes to the roles of the CEO, Finance Director and National Board up till now have raised questions about what the role of the National Treasurer has in practice become. They retain the responsibility for signing off the national accounts, but in practice no longer oversee the finances of the organisation in governance terms. It is also in practice very difficult for an elected police officer to accumulate the skills and experience needed to perform this governance responsibility effectively. The branches we have spoken to value the support given by the current National Treasurer and the Treasurer meetings, but the interactions they have are for most largely now with the central finance team rather than this postholder. Our view is that this role should become an honorary position, possibly held by the Deputy General Secretary.

Recommendation 33

The position of full-time National Treasurer should be abolished and replaced by an honorary position possibly combined with that of Deputy General Secretary.

Section 4 – Implementation

In the introduction to this report, we recognised the scale of external and internal challenge and turbulence which the Federation has gone through in the past 15 years. We know from the internal struggles to implement the recommendations of the Normington report that structural change is hard. We also know that cultural change is even harder and that the recommendations of this report demand both structural and cultural change.

The Federation does now have a professional management structure which should facilitate the successful implementation of our recommendations, but this will also require leadership and commitment not only from the CEO and senior professional staff, but also from the General Secretary and Deputy and those members who are shortly to be elected to national office.

The CEO should prioritise implementation of the recommendations of this report, with oversight from the National Board. Progress should be monitored and formally evaluated to ensure speedy implementation.

We also recommend that the Federation uses external advisors who are expert in and experienced with structural and cultural change in membership organisations as a small reference group to provide support and challenge in the implementation process. This does not mean that the Federation must employ a new team of consultants. We believe that the Federation must own the implementation of these reforms, champion them and move the Federation into an organisation to which its members can commit in order to improve the status of policing and the quality of their working lives.

The scale of change envisaged is significant, touching all aspects of the Federation's structures, geography and ways of working. Some recommendations may also require the support and active engagement of external stakeholders and changes to regulations enshrined in legislation. The Federation – unlike other organisations with similar purposes – operates within a framework where other stakeholders have a significant impact on its internal operations. The scheduling of meetings and many other aspects of its work locally are at the behest of the Chief Constables, who are also able to call Federation officials at all levels – including the national roles – back to full-time policing if they see fit. A great deal of the Federation's activities – from the ARP system for remuneration of Board members to the Appendix 8 and 9 disciplinary procedures and the electoral system of the Federation – are enshrined in legislation, and require Government legislative space and support to change. This makes reform very slow, and not entirely within the Federation's gift. We would question why this is so, and suggest that rather than just changing the required legislation to enact

these recommendations it should be considered whether such matters should be set out in legislation at all.

We recognise that not all of this can happen in one go, indeed it may well take 3 or 4 years for full implementation and even longer for the cultural changes to take effect. We have therefore grouped our recommendations into those that should be embarked upon now, and those that should be planned for and worked on but implemented later. This is set out in the table below. In essence, changes that are largely within the Federation's power to enact are proposed for implementation immediately. Meanwhile the organisation will need strong leadership to navigate the implementation programme and continue with its purpose, fighting for police officers in the face of all the challenges we outlined earlier. For this reason, for the time being the roles of National Chair, National Secretary and Chief Executive Officer should continue as presently defined, enhanced by the legitimacy of the election process currently underway, along with the function and membership of the National Council. The changes to these roles should be implemented together by the end of the current triennial in 2028. This should also be the time when decisions would be implemented on any changes to the number of branches and a possible move to a regional structure. By the end of 2028 the full implementation of the recommendations in our report would be complete.

Recommendation 34

The Federation is supported in implementation of these recommendations not by a firm of consultants, but by a small independent reference group to provide challenge. It should be the responsibility of the CEO to ensure implementation of the recommendations outlined in this report, overseen by the National Board.

Recommendation 35

In order to reassure the membership and external stakeholders of the seriousness of the Federation in implementing these important reforms there should be a post implementation review each year after the publication of this report which would record the progress that has been made and report back to the wider membership. This should be repeated in 2028 to evaluate the full implementation programme.

Recommendation 36

Phased implementation should be undertaken in line with the schedule below, with implementation complete by the end of 2028.

| Recommendation | 2025 | 2026 | 2027 | 2028 |
|---|-------------|-------------|-------------|-------------|
| 1. Communications function overhaul | X | | | |
| 2. Organising function established | X | X | | |
| 3. Role profiles for branches and training | X | | | |
| 4. Policy and research department revamped | X | X | | |
| 5-7. Appendix 8 and 9 changes | X | X | | |
| 8. Branch accounts transparency and reform | X | X | X | |
| 9. Branch accounts structure | X | X | | |
| 10. Consideration of regional model | X | X | X | X |
| 11. New General Secretary role | | | | X |
| 12. New Deputy General Secretary role | | | | X |
| 13. Abolition of National Secretary + National Chair roles | | | | X |
| 14. CEO appointment process | X | | | |
| 15. Remuneration of CEO and senior executives | X | | | |
| 16. Role of National Council | X | X | X | X |
| 17. Size and composition of National Council | X | X | X | X |
| 18. Meeting frequency of National Council | X | X | X | X |
| 19. Tenure of National Council members | X | X | X | X |
| 20. Role of National Board | X | X | X | X |
| 21-22. Size and composition of National Board | X | X | X | X |
| 23. Tenure of National Board members | | | | X |
| 24-25. National Board papers and minutes | X | | | |
| 26. Election of National Board members | | | | X |
| 27. Remuneration of National Board members (ARP) | | | | X |
| 28. Portfolios of National Board members | X | X | X | X |
| 29-31. National Board and regions | X | | | |
| 32. Sub-committees of National Board | X | | | |
| 33. Abolition of National Treasurer role | | | | X |
| 34-36 Implementation | X | | | |
| | | | | |

Conclusion

We have now been involved with the Federation for nearly a year. In that time, we have seen how the Federation has managed challenges which have the capacity to overwhelm it – most notably the judgement of the Employment Tribunal in the Police Pensions Claimants' case, and more recently the Data Breach case.

Our work with the Federation, both nationally and locally, convinces us that now, as much as ever, police officers need and deserve a Federation which they can be proud of. A Federation which powerfully represents their interests and secures real improvements to their working lives.

Without a last resort to industrial action the Federation must ensure that its representation and negotiation of its members is grounded in their aspirations and concerns, underpinned by strong policy and research and taken forward in conjunction with nationally important bodies in policing and the Home Office.

In order for this to happen the Federation must engage in the significant reform of its culture and governance structures detailed in this report. We urge the Federation not to spend another 5 years arguing about implementation but to move ahead purposefully, supported by the national stakeholders who exercise an unusual degree of control over its processes.

In our meetings with Federation representatives at national and local level we have been struck by the dedication and resourcefulness of Federation reps and officers. Individually many are doing sterling work on behalf of their members, often at a considerable personal cost to themselves. The purpose and intent of our report is to secure a better Federation to improve the working lives of its rank-and-file members and to improve the status of policing. We believe that with renewed effort this is achievable. We wish the Federation success in its efforts to implement these necessary changes.

Mary Bousted

April 2025

Peter Vicary Smith

Appendix 1

List of recommendations

Recommendation 1

The communications function of the Federation should be radically overhauled to enable it to articulate and advocate effectively on the issues of concern to its membership, their aspirations for better working lives and better terms and conditions for the membership.

Recommendation 2

The Federation should provide professional support for branches and reps through the creation of an organising function with an organiser appointed to support branches in each region.

Recommendation 3

The Federation should agree clear role descriptions for all branch officer posts, including Rep, Chair and Secretary and develop training to support officers in their roles. This training should be planned on a national basis, and delivered on a local basis, through branches and regions, and supported and developed by the Federation's newly created organising team (see recommendation 2).

Recommendation 4

The Federation should establish a revamped professional policy and research department reporting to the Chief Executive but with a strong dotted line to the new General Secretary role to research the foundations for possible campaigns that deliver against issues of concern to members.

Recommendation 5

The Federation centrally should provide the clearest possible guidance on the purpose and operation of Appendix 9 and regular updates for the regions and branches on the number of cases being investigated and the number of suspensions pending investigation and resolution of the complaint.

Recommendation 6

The Appendix 8 standards should be used as a basis to generate 'case studies' of actions and behaviours which would result in the serving of an Appendix 9 notice.

Recommendation 7

Given the concerns about the operation of Appendix 9 we recommend that the Federation creates a complaints panel of rank-and-file members to hear cases and make judgements, with support from external specialists where appropriate.

Recommendation 8

All branch accounts should be declared and reported in the national accounts. Indeed, we would go further and urge the Federation to consider whether these resources could and should be combined with those of the centre to create one transparent resources pot to be deployed in accordance with organisational objectives. This should be a project supported by the Board with external input on the legalities, involving National Council members and branch officials too. In addition, the Federation should consider providing for future joiners regional group insurance schemes or a national scheme to secure the economies of scale that such a scheme could potentially unlock.

Recommendation 9

Branch accounts should all be audited by the same firm auditing the national accounts.

Recommendation 10

We urge the Federation to consider whether a regional rather than branch model of organisation would create greater parity between member areas, greater ability to resource locally and more powerful interactions with Chief Constables.

Recommendation 11

The National Chair and National Secretary roles should be abolished and replaced by a new role of General Secretary. They should also have a tenure limit, of a maximum of one 5-year term with the possibility of serving a further 3-year term. This ensures they retain a direct knowledge of the issues facing front-line police officers and don't become 'institutionalised' by protracted periods at Head Office, whilst still giving time for them to gain the experience valuable in executing the role effectively.

Recommendation 12

A revised Deputy General Secretary role should be formed as outlined above, with a tenure limit of two four-year terms

Recommendation 13

The roles of National Secretary and National Chair should be abolished, in 2028 at the end of the next period of office.

Recommendation 14

The CEO role in the future to be made following a formal process led by a newly created Nominations Committee of the Federation and consisting of external advertising and formal interviews. The appointment should be approved by the General Secretary (as the representative of the members) and the National Board. Consent to this appointment should also be secured from the National Council.

Recommendation 15

The remuneration of the CEO and other senior executives should be set by a newly created Remuneration Committee on the recommendation of the General Secretary in the case of the CEO and the recommendation of the CEO in the case of other senior executives, with support from qualified benchmarking consultants. The CEO's remuneration should be approved by the National Board and the structure reported to the National Council for discussion on a triennial basis. The amount of remuneration should be reported annually to the National Council and disclosed in the Annual Report and Accounts.

Recommendation 16

The function of the National Council should be changed, being to ascertain the views of members through meetings, surveys and the like and then bring those perspectives to bear on issues presented for debate.

Recommendation 17

The National Council should be radically reduced in size to facilitate effective debate. It should comprise 3 representatives from each of the 8 Regions (directly elected by the membership and not automatically Branch Chairs or Branch Secretaries) together with the General Secretary and up to 3 other members from protected categories or to ensure all ranks are represented. The CEO should attend Council meetings.

Recommendation 18

We recommend the National Council continues to meet 3 times a year.

Recommendation 19

Again, we see it as important that these roles are not regarded as 'jobs for life'. We therefore recommend tenure limits for National Council positions of two 4-year terms.

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The Federation is supported in implementation of these recommendations not by a firm of consultants, but by a small independent reference group to provide challenge. It should be the responsibility of the CEO to ensure implementation of the recommendations outlined in this report, overseen by the National Board.

Recommendation 35

In order to reassure the membership and external stakeholders of the seriousness of the Federation in implementing these important reforms there should be a post implementation review each year after the publication of this report which would record the progress that has been made and report back to the wider membership. This should be repeated in 2028 to evaluate the full implementation programme.

Recommendation 36

Phased implementation should be undertaken in line with the schedule below, with implementation complete by the end of 2028.

Appendix 2

Quotations

The following is a sample of the comments made directly to us in interviews concerning perceptions of the CEO and their role. We make no judgement as to the accuracy or reasonableness of any of the comments, but include them here as a matter of record.

For a long time, we've needed someone like MK [Mukund Krishna] to come into the organisation, someone who's business minded to lead a £40 million pound business.

MK has our support as a branch and I have put that in writing to him. We are where we are because we have tried to run a multi-million-pound business by police officers.

I like what MK is bringing in under the new structure. They are experts in the field they are in charge of and they are not police officers. We have had police officers running the company for years and they aren't qualified to do it. I know MK is getting a lot of push back but I have been on record saying that I like MK. They have asked someone to come into the Fed to reform it – the pushback is self-interest.

You now have someone who has experience of running a multi-million-pound organisation. But he just appeared, no one knew anything about it and people asked how much is it costing us. The National Board should have taken responsibility for protecting him. The National Board just don't speak.

We've had the CEO foisted upon us. We weren't consulted as National Council members when MK was appointed.

The problem is that we don't have a clear organisational structure which clearly defines what is the National Chair, the National Secretary and the CEO is for. All members see is the CEO talking for the organisation. If that's the way we're going that's OK but that hasn't been communicated to the membership. If MK is talking about pay and conditions with government what's the point of the GS [General Secretary]? The feeling is that inactivity on the part of the National Chair and GS [means] MK is having to do that work – it looks like power-grabbing but it is a power vacuum.

MK is doing the right thing in bringing in the business element as long as that doesn't seep into representational roles.

The CEO is usurping the elected officials. Police Officers want the voice of someone who has been there and done it. There's an overreach there. We would not have voted for national board members who did that and we won't do it in the future

I am the first to say we need to professionalise as an Association. We should have a national board and executive who are the authentic voice of the membership and negotiate on their behalf. We then need a professional layer underneath – finance, legal, comms – so that the board would make decisions on the written advice of the professionals – so if they deviated there would be documentation on why they took a different course of action. But the pendulum has swung completely the other way.

Appendix 3

About the Panel Members

Baroness Mary Bousted, Chair

Mary Bousted has over 25 years of experience leading major trade unions representing teachers, leaders and support staff and workers in the public sector. She was elected president of the TUC in 2017 before becoming Joint General Secretary of the National Education Union – with over 500 thousand members the biggest education union in Europe, a position she held until August 2023. Baroness Bousted was granted an Honorary Professorship with the Centre of Teachers and Teaching Research from University College London.

Mr Peter Vicary-Smith

Peter Vicary-Smith spent 14 years as chief executive of the consumer membership organisation Which?. He has extensive experience of governance matters in a range of organisations. He advises both established companies and digital start-ups on engaging with their customers and members and putting their needs front and centre of decision-making. Mr Vicary-Smith is the chair of the BMJ Publishing Group and a non-executive director of its parent the BMA. He is also an independent non-executive director of Northumbrian Water and has just finished his term as chair of Oxford Brookes University.

Appendix 4

Non-anonymous Interviewees

| <u>Person</u> | <u>Role</u> |
|---------------------------------|---|
| Ollie Abercrombie | Branch Treasurer, Devon and Cornwall |
| Hayley Aley | National Board Member |
| Nicki Bell | Branch Treasurer, Hampshire |
| Chief Constable Amanda Blakeman | Chief Constable, N. Wales |
| Brian Booth | Acting Deputy Chair |
| Lee Broadbent | Previous National Council Member |
| Sir Andy Cooke | His Majesty's Inspectorate of Constabulary |
| Sam Dobbs | National Council Member |
| Gemma Fox | Deputy National Secretary |
| Seamus Gillen | Consultant |
| Belinda Goodwin | National Board Member |
| Steve Hartshorn | National Chair (Suspended) |
| Craig Hewitt | National Board Member (Head of Civil Claims) |
| Sue Honeywill | National Board Member |
| Vanessa James | Lawyer (In-House Counsel) |
| Phil Jones | National Board member |
| Simon Kempton | Treasurer |
| David Kennedy | General Secretary, Scottish Police Federation |
| Mukund Krishna | CEO |
| Tiffany Lynch | Acting National Chair |
| Calum Macleod | National Secretary (on leave) |
| Jamie McTear | Branch Treasurer, Cumbria |
| Zac Mader | National Board Member |

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|------------------------------|--|
| Sir Andy Marsh | CEO, College of Policing |
| John Partington | Acting National Secretary |
| Rick Prior | National Council Member |
| Chief Constable John Robins | Chief Constable, West Yorkshire |
| Ian Saunders | National Board Member |
| Nigel Snell | Branch Treasurer, Thames Valley |
| Peter Spreadbury | Deputy Director, Police Workforce and Professionalism, Home Office |
| Gavin Stephens | Chair, National Police Chiefs Council |
| Steve Taylor | National Board Member |
| Melanie Warnes | Acting Deputy National Secretary |
| Chief Constable Mark Webster | Chief Constable, Cleveland |
| Avon and Somerset branch | Branch Officers |
| Cheshire branch | Branch Officers |
| City of London branch | Branch Officers |
| Cleveland branch | Branch officers |
| Cumbria branch | Branch Officers |
| Devon and Cornwall branch | Branch Officers |
| Durham branch | Branch Officers |
| Gloucestershire branch | Branch Officers |
| Greater Manchester branch | Branch Officers |
| Gwent branch | Branch Officers |
| Hampshire branch | Branch Officers |
| Lancashire branch | Branch Officers |
| Leicestershire branch | Branch Officers |
| Lincolnshire branch | Branch Officers |
| Metropolitan branch | Branch Officers |
| Norfolk branch | Branch Officers |
| North Wales branch | Branch Officers |
| Nottinghamshire branch | Branch Officers |

| | |
|------------------------|-----------------|
| South Wales branch | Branch Officers |
| South Yorkshire branch | Branch Officers |
| Thames Valley branch | Branch Officers |
| Warwickshire branch | Branch Officers |
| West Midlands branch | Branch Officers |
| West Yorkshire branch | Branch Officers |