

Police Federation

Of England and Wales



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April 2020

Home Office: Police Covenant Consultation

Thank you for the opportunity to provide feedback on the Police Covenant and please find to follow below the response from the Police Federation of England and Wales.

Policing is a dangerous and difficult profession and those who do it deserve the full support of Government. For several years now the Police Federation has been calling for a Police Covenant and we have made clear that the Government can and should do more to protect police officers. We therefore very much welcome this consultation and the intention to create a Police Covenant, enshrined in law, in legislation.

The Police Covenant must be more than just a document; it must be meaningful, relevant, fit for purpose and make a real difference to officers' lives. It must offer physical and psychological protection and support the welfare and wellbeing of police officers and their families.

The challenges, dangers and threats police officers face are often unpredictable, but the unique and selfless support offered by officers means they adapt and deal with the unknown. Who would have thought that during the passage of this consultation itself, we would be dealing with a global pandemic and policing a lockdown across the UK? Once again this brings to the fore the expectations that Government and society has of police officers - putting themselves and their families in danger to help and support communities. In this instance, to help save lives and ease the burden on the NHS.

It is therefore right that this Covenant is for policing; a Police Covenant that recognises the unique and valuable role in society provided by police officers, supported by their families. Also, that it takes account of the restrictions on officers' professional and personal lives and the impact that has on their families too.

In our response, supported with data from our member surveys, we focus on key health and wellbeing issues we believe the Police Covenant should incorporate to help support and safeguard officers. In addition, we identify better ways of ensuring a consistent approach, often hindered by the 43-force model, for the provision of protective equipment, uniform and kit; appreciating that the Home Office is already looking at models of national procurement.

We also identify ways in which the Government could recognise and reward the personal and collective efforts of police officers and demonstrate greater public appreciation and value of policing.

I appreciate the next steps will be for the Home Office to work through the consultation responses and to further frame how the Police Covenant could look. As I have said, in conversations with the Home Secretary and Home Office officials, the Police Federation is keen to take an active role as this moves forward. We want to ensure, through further member engagement, that the Police Covenant is relevant and meaningful and makes a positive tangible difference to the welfare and wellbeing support available for police officers and their families.



John Apter
National Chair

PFEW Consultation Response

Home Office: Police Covenant

April 2020

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1. Executive summary

- 1.1. The Police Federation of England and Wales (PFEW) has been campaigning for the development and implementation of an appropriate Police Covenant along with Police Oracle for several years. As such, the PFEW consider the development of the Police Covenant to be a positive opportunity to enshrine in legislation greater protection and welfare provision for our members and their families.
- 1.2. We believe that, if successfully implemented, a Police Covenant has the potential to provide a much needed boost to our members by recognising the unique role they have in society, by valuing what they do and ensuring changes to their jobs and their lives for the better, and by delivering peace of mind for their families.
- 1.3. Overall, the draft Police Covenant pledge delivers a clear and supportive message, with only moderate revisions recommended. In particular, the PFEW would encourage the Home Office to: review the reference to the Code of Ethics; provide more clarity in relation to whom the Police Covenant has been designed to support; include acknowledgement of the serious consequences that can be borne by officers as a result of their roles and responsibilities, and; include a statement highlighting that in some cases (e.g. injury), special consideration/prioritisation is appropriate.
- 1.4. The PFEW believe that for the Police Covenant to be of any benefit, it must be enshrined in law. Not doing so would undermine the intent of the Police Covenant, eliminate accountability, and create disparity with the Armed Forces. (The Armed Forces Covenant is enshrined in the Armed Forces Act 2011, which obliges the Defence Secretary to make annual reports on the government's progress in honouring the Covenant).
- 1.5. We agree that it is imperative to include physical protection as a core element of the Police Covenant, but we also encourage the Home Secretary to consider widening the scope of 'physical protection,' to include protecting officers from psychological harm.

- 1.6. Though there are some pockets of good practice, there are disparate levels across the 43 Police Forces of England and Wales regarding the type, quality, and accessibility of various Personal Protective Equipment (PPE), standard work equipment, and uniform. We believe that a national procurement strategy for the provision, standardisation and consistency of goods and services including PPE, uniforms and equipment would be beneficial for the police service. This should include the provision for bilingual signage for Wales, as is a legal requirement in Wales.
- 1.7. Officers are expected to keep themselves sufficiently fit and healthy to undertake their role. They are exposed to physical and psychosocial hazards on a regular basis and experience a job where the demand is constantly high, the resources are often scarce, and the remit is ever widening. As such, we believe it is essential that the health and wellbeing of officers be considered holistically (ensuring inclusion of physical, psychological, financial and more general aspects of wellbeing), and to be included as a core element within the Police Covenant.
- 1.8. Without the support, understanding and personal sacrifices of their families, our members would not be able to do the incredible job that they do; and as such, we believe that support for families should be considered a core component of the Police Covenant, as it is for Armed Forces' families.
- 1.9. At present, we feel that the honours and awards system is failing to capture and reflect the dedication, commitment and bravery of all those members of the policing family who selflessly give so much doing their jobs. In particular, we believe that there is a lack of formal and state recognition, particularly in relation to bravery.
- 1.10. Although we can see the potential benefit in setting a consistent minimum standard for accessibility, quality, content and length of Officer (Personal) Safety Training (PST), and governmental involvement in setting national standards for police safety equipment, there could also be real potential for these changes to cause unintended and unwanted outcomes. As such, we would suggest that additional consultation with key policing stakeholders around the benefits and challenges to the above would be needed before any progression was made.
- 1.11. The Police Covenant pledge creates and documents commitment from key stakeholders and partner agencies: but it is the policies, services and projects subsequently built upon these founding sentiments that will actually deliver tangible outcomes to officers.

- 1.12. As such, we hope that the Home Office will continue to consider the PFEW as a key stakeholder in the continuing development of the Police Covenant, by providing ongoing opportunities to feed into, and consult on, the project as it progresses.

2. Foreword

- 2.1. The PFEW has been campaigning for the development and implementation of an appropriate Police Covenant, along with Police Oracle, for several years. As such, the PFEW consider the development of the new Police Covenant to be a positive move towards protecting our members and their families.
- 2.2. We believe that if successfully implemented, a Police Covenant has the potential to provide a much needed boost for our members by ensuring changes to their jobs and their lives for the better, and by delivering peace of mind for their families.
- 2.3. As the representative body for 120,000 police officers across England and Wales, we welcome the opportunity to provide feedback on the Police Covenant and want to ensure that our members' views are taken account of.
- 2.4. The Police Covenant pledge creates and documents commitment from key stakeholders and partner agencies. But the delivery of the right outcomes from this pledge will require the development of supporting policies, services and projects, in line with the pledge's intention.
- 2.5. We appreciate that the pledge is just the start of the work that needs to be done, and we ask that the Home Office continue to consider the PFEW as a key stakeholder in the continuing development of the Police Covenant. We trust that will include ongoing opportunities to feed into all aspects of the project on behalf of our members as it progresses, including the policies, services, and projects.
- 2.6. The rest of this document first details our thoughts in relation to the three key covenant themes of physical protection, health and wellbeing, and support for families; before providing a 'Response Table' which provides a more direct and concise answer to each of the consultation questions individually. Then finally, there is a list of example outcomes that we might hope to be considered as part of a Police Covenant.
- 2.7. Though we hope that this document addresses the consultation queries, please do not hesitate to contact us if additional information or guidance is needed.

3. PFEW view of the Police Covenant scope and principles

- 3.1. As mentioned in the foreword, the PFEW has been calling for the development and implementation of a Police Covenant for several years; and therefore consider this development to be an extremely positive move towards protecting our members and their families.
- 3.2. British policing is revered the world over, and our members are the very backbone of the service. However, unfortunately the reductions in officer numbers and changes to officer pay and conditions has led to many officers feeling devalued, demoralised and unappreciated.
- 3.3. Whilst the PFEW acknowledges the considerable differences between the work that the Police Service and the Armed Forces do, we believe that they are both equally valuable to society and each face their own risks, and restrictions on individuals and families. As such, the PFEW believes that whilst the content of the Police Covenant should differ, the outcomes in terms of *quality* should have parity with the Armed Forces' Covenant. As such, the PFEW believes that to be of any benefit, the Police Covenant must be enshrined in law and there must be clear and transparent accountability.
- 3.4. If not properly written into legislation, there is a danger that the good intent behind the development of the Police Covenant could be undermined and accountability diffused.
- 3.5. Neglecting to enshrine the Police Covenant in law would also create disparity with the Armed Forces, thereby reducing its legitimacy in the eyes of our members. Such disparity could also be interpreted as an indication that the government regards the Office of Constable as being less valued than other public servants.
- 3.6. The development of a suitable and robust Police Covenant - protected in law as is the Armed Forces' Covenant - would enshrine the government's obligation to officer welfare in law, and set out its responsibilities in a demonstrable and legal framework; helping to ensure that officers and their families are recognised, protected, and supported appropriately by the society which they serve.

4. PFEW view of the Police Covenant wording

- 4.1. The PFEW would like to acknowledge the positive and respectful sentiment that is clearly demonstrated through the wording of the current Police Covenant draft, and welcome the opportunity to feedback on its content.
- 4.2. On the whole, the wording of the draft Police Covenant delivers a clear and supportive message regarding the value and importance of our members. However, there are a few issues that it would be remiss of us not to raise in order to help ensure the Police Covenant is clear and unambiguous.
- 4.3. The first is of a technical nature, in relation to the referencing of the College of Policing's Code of Ethics (CoE):
- 4.4. *"They must also abide by a code of ethics which sets out the high standards of behaviour expected from everyone who works in policing in England and Wales, both on and off duty."*
- 4.5. Whilst the CoE applies to police officers, it is actually the Standards of Professional Behaviour (SPB) that set out a statement of expectations specifically in relation to how police officers should behave. These are included within Police Conduct Regulations.
- 4.6. Though we understand the underlying sentiment in referring to the CoE, we feel it would be more appropriate and more accurate to refer to the SPB than the CoE within the context of expected conduct. (As the CoE underpins the SPB, it is perfectly correct to refer to both).
- 4.7. We would suggest that the wording is changed to either:
- 4.8. *"They must also behave in accordance with the Standards of Professional Behaviour; legislation that sets out the high standards of behaviour expected from Police Officers in England and Wales, both on and off duty."*
- 4.9. Or;

- 4.10. *“They must also behave in accordance with the Standards of Professional Behaviour; legislation based on the police Code of Ethics that sets out the high standards of behaviour expected from Police Officers in England and Wales, both on and off duty.”*
- 4.11. Secondly, we have concerns that the current wording in relation to whom the Police Covenant has been designed to support, could give rise to some confusion i.e.:
- 4.12. *“those who serve or have served in our Police Forces, or hold the office of Special Constable,”*
- 4.13. It could be argued that, at present the wording does not clearly specify whether this includes police staff, and/or those who have previously (but no longer) held the office of Special Constable.
- 4.14. Clearly defining the scope of the Covenant is key in ensuring that the right people get the right support at the right time.
- 4.15. The third consideration we would like to raise is in relation to the wording around officer accountability and responsibilities. Although there are many examples of the high level of personal accountability and responsibility in an officer’s role, there are currently no examples of the *consequences* that officers may face as a direct result of these responsibilities (such the risk of injury and assault).
- 4.16. It may be helpful to make these consequences explicit within the wording of the Covenant to demonstrate the need for additional support in accessing health care and support for their wellbeing.
- 4.17. For example, the below could be included directly after the first paragraph:
- 4.18. *“These responsibilities come with increased personal risk, restrictions on one’s private life, and potential exposure to severely distressing material events.”*
- 4.19. The final consideration that we would like to raise is the inclusion of a statement, similar to that included in the Armed Forces Covenant, highlighting that in some cases (especially for those who have given the Police Service the most, such as the injured and bereaved), *special consideration* is appropriate. Without such a statement, there is no clear directive to prioritise treatment and support for those who need it the most.

5. PFEW view of the Police Covenant themes

5.1. Physical Protection – Scope and value

- 5.1.1. As the demands on policing have increased and the number of officers has fallen, we have seen a rise in the number of assaults on police officers.
- 5.1.2. As the Home Secretary states in the Covenant foreword:
- 5.1.3. *“They run towards danger to keep the public safe; putting their own lives on the line to protect us all.”*
- 5.1.4. Assaults on officers must never be seen as just part of the job, and for a number of years we have called for stronger measures to both protect officers and deter offenders.
- 5.1.5. Not only can physical assaults on officers have significant and long-lasting health impacts for the officers involved (both physical and psychological), they can also carry a financial burden in the form of health care support, lost productivity, equipment costs, and as recruitment and retention expenditures.
- 5.1.6. In 2018/19 alone, there were over 30,000 recorded assaults on police officers in England and Wales, over 10,000 of which had resulted in injury.¹ Given that many assaults are left unrecorded, these numbers are considered to be a substantial underestimation.
- 5.1.7. A report produced by the PFEW’s Research and Policy Department (to support the National Police Chiefs’ Council 2019 Officer Safety Review), estimated that the full economic and social cost of officer assaults for the year 2018/19 was over three hundred and sixty million pounds.²
- 5.1.8. The PFEW has always been concerned with the safety of its members, and as such has been collecting data on their experiences. For example, the results from the PFEW 2018 Demand, Capacity and Welfare Survey demonstrated that 31% of

¹ Home Office. (2019). *Statistics on the number of police officers assaulted in 2018/19, England and Wales*. Retrieved from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/817742/hosb1119-assaults.pdf

² Elliott-Davies, M. (2019). *Officer Assaults: A brief view on the economic costs October 2019* (R091/2019). The Police Federation of England and Wales.

participating officers reportedly experienced unarmed physical attacks at least once a month over the previous year, and 30% indicated that they had been attacked with a weapon at least once over the past 12 months.³

- 5.1.9. The results from this survey also highlighted that the majority of officers wanted more access to key personal protective equipment (PPE) and procedures than they currently have – including access to double-crewing, Taser, and spit guards.
- 5.1.10. Although it is unlikely that the role of a police officer will ever be completely without risk, it is the duty of the Police Service and the Government to monitor, manage and minimise the hazards and associated harms to officers as much as possible. As such, the inclusion of protection within the Police Covenant is viewed by the PFEW as essential.
- 5.1.11. However, the protection of our members should not be restricted to the physical alone.
- 5.1.12. Officers can regularly encounter extremely distressing and/or dangerous events in the line of duty. 62% of respondents from the 2018 PFEW Demand, Capacity and Welfare Survey indicated that they had experienced at least one incident in the previous year that could be considered extremely stressful, upsetting, or dangerous.
- 5.1.13. Moreover, 30% indicated that they had sought help for mental health and wellbeing difficulties associated with, or due to, a potentially traumatic incident that they experienced in the line of duty; half of whom had sought this help within the previous 12 months.⁴
- 5.1.14. As such, it may be unsurprising that one in five officers suffer from undiagnosed PTSD,⁵ and research by the University of Surrey has found that poor mental health and wellbeing is twice as likely to force officers to take significant time off work than physical injuries.⁶

³ Elliott-Davies, M. (2019). *PFEW Demand Capacity and Welfare Survey 2018, Officer Safety Summary Report October 2019* (Report: 090/2019). The Police Federation of England and Wales.

⁴ Elliott-Davies, M. (2018). *PFEW Demand, Capacity and Welfare Survey 2018. Headline Statistics. December 2018*. (Report: R101/2018). The Police Federation of England and Wales. Retrieved from: <https://www.polfed.org/media/15355/demandcapacityandwelfaresurveyheadlinestatistics2018-06-02-19-v1.pdf>

⁵ University of Cambridge. (2019). *Policing: The Job & The Life* [Report Briefing]. Retrieved from: https://www.cam.ac.uk/sites/www.cam.ac.uk/files/inner-images/thejobthelife_findings.pdf

⁶ Police Dependents Trust. (2016) *Supporting The Service Police Injury On Duty Research Results 2016*. Retrieved from: <https://www.pdtrust.org/research-results/>

- 5.1.15. Psychological harm is a key concern for PFEW, and we believe that this should be protected against, recorded, managed and supported with the same fervour as physical harm.
- 5.1.16. Given the above, we believe that it is imperative to include psychological protection as a core element of the Police Covenant, and we encourage the Home Secretary to widen the scope of '*physical protection*' to include protecting officers from psychological harm.

5.2. **Physical Protection – Protective measures**

- 5.2.1. Physical protection within a policing context is not just about having the right equipment or training, it is also about having enough capacity, safe crewing, and the appropriate legislation to keep officers safe.
- 5.2.2. Unless there are enough officers to meet the demands being placed on the Police Service, (nationally and locally), officers are at greater risk of both physical and psychological harm. Workloads can become heavier, back-up can take longer to arrive, stress levels can become higher, and resilience can fall.
- 5.2.3. Safe crewing practices are another key factor in protecting officers from physical and psychological harm. There is evidence to suggest that single crewing can have negative impacts on the health and wellbeing of officers,⁷ and such risks should be taken into account when crewing decisions are made.
- 5.2.4. Protecting the protectors through appropriate legislation is also key. PFEW welcomed the legislative changes in 2018 (that we had long argued for), doubling the maximum sentence for assaults to emergency service workers from six to 12 months. However, we had concerns this did not go far enough for police officers and therefore welcome the current consultation on sentencing for assaults which may result in harsher penalties. In addition to this, better data collection on officer assaults and the wider roll-out of protective measures are also still needed to help ensure the long-term safety of our members.
- 5.2.5. PPE such as body armour, stab vests, spit guards, riot shields, and Chemical, Biological, Radiological and Nuclear (CBRN) kit are undoubtedly key elements of such protection measures, as are; uniforms, standard issue equipment (e.g. handcuffs,

⁷ Houdmont, J., Elliott-Davies, M., & Donnelly, J. (2019). Single crewing in English and Welsh policing: frequency and associations with violence towards and injuries in officers. *Policing and society*, 29(7), 820-833. Retrieved from: <https://www.tandfonline.com/doi/full/10.1080/10439463.2017.1417990>

batons, incapacitant spray, body worn video cameras, communication devices), police vehicles, and the officers' working environment (e.g. custody suites).

- 5.2.6. During the initial police response to the Covid-19 pandemic, we gathered evidence which showed that not all forces had enough PPE and a number of forces had difficulties with distribution to all frontline officers.
- 5.2.7. Any and all work equipment provided to our members should be safe, fit for purpose, reliable, accessible, and regularly reviewed to ensure it remains as such. All working environments should also be safe, fit for purpose and regularly reviewed. Unfortunately, this does not always appear to be the case. Again, during the Covid-19 policing response, we saw confusing and mixed messages for officers coming from the National Police Chiefs' Council as a result of differing advice from the Health and Safety Executive and Public Health England (which is not the health body that has jurisdiction over Wales, as that is Public Health Wales).
- 5.2.8. Though there are some pockets of good practice, there are disparate levels regarding accessibility of various PPE, standard work equipment, and uniform quality across the 43 forces. It cannot and must not be a postcode lottery for officer safety when it comes to access to the best equipment and uniform for all.
- 5.2.9. In some cases, this disparity is not just between forces, but also between specific demographic groups. Body armour (BA), for example, often poses a challenge for female officers, with many reporting that their BA is of poor fit; essentially rendering it uncomfortable and ineffective. There is also the potential for an individual's sizing needs to change quite rapidly over time (for both male and female officers); causing a challenge in ensuring that BA remains fit for purpose after the initial fitting.
- 5.2.10. Given the above, it is our opinion that reviewing and providing officers with appropriate protective measures, equipment, environments, and uniforms that are suitable for a diverse and modern police force, is still an ongoing challenge for the service.
- 5.2.11. We believe that a national procurement process for standardised goods and services, including equipment, uniform and information technology, would be beneficial for policing. This may go some way towards minimising disparity across forces as well as increase purchasing power and improve the quality of goods.
- 5.2.12. However, without support from the Police and Crime Commissioners and Chief Officers across all 43 forces, national specifications for the above would be extremely

difficult to develop, maintain, and enforce. This again raises questions as to the future of the 43-force model.

5.2.13. Given the above, there may be some potential benefit to Governmental consideration of a national procurement processes for police safety equipment and uniform, with appropriate safeguards and interventions regarding suitability for policing from external agencies such as the Health and Safety Executive. The extent of such involvement, however, would need to be properly scoped and discussed before our position on such a proposal could be established.

5.2.14. As such, we would encourage the Home Secretary to consider further consultation with key stakeholders, to ensure that the reach and scope of any such proposed changes can be properly examined, reviewed and debated.

5.3. **Physical Protection – Training**

5.3.1. Training is imperative to provide officers with the necessary knowledge and skills they need to protect themselves, their colleagues and the public. Proper provisions have the potential to reduce officer assaults, injuries (both those due to work-related violence, and work-related accidents and help officers to maintain good physical and psychological health.

5.3.2. Although Officer (Personal) Safety training (referred to hereafter as PST) is a key element in officer protection, there is substantial variation in regard to the number of hours dedicated to PST in each force, as well as the types of techniques included in the training.

5.3.3. However, PST is not the only training needed to ensure that officers' health and wellbeing are protected. Appropriate training for specific pieces equipment (such as Taser); new technology (such as the latest Body Worn Video cameras); how to help mitigate the health impacts of work (such as manual handling in custody suites, or maintaining musculoskeletal health whilst wearing body armour), and; identifying and assisting colleagues that need support (such as Trauma Risk Management (TRIM) or mental health first aid training), are also important in protecting officers.

5.3.4. As is the case with PST, we believe that the types of training listed above also vary across forces in terms of accessibility, quality, content and length.

5.3.5. It is imperative to ensure that all officers in all forces have consistent access to high quality and ongoing PST.

5.4. Health and wellbeing – Scope and value

- 5.4.1. First and foremost, we would like to highlight that there is an expectation for officers to be sufficiently fit and healthy to undertake the role that they are required to perform by their Chief Officer. As such, the PFEW feels that it is only right that they are supported to maintain good health and are treated fairly if their health suffers in the line of duty.
- 5.4.2. This is especially important given that, as evidenced in the previous section, officers do a risky and dangerous job. Therefore, it is vital that the challenging nature of operational policing, and the hazardous environments in which officers are required to work, are appropriately recognised, monitored and managed.
- 5.4.3. Effective health and safety risk management must be integral to the culture of the Police Service of England and Wales, so that the right balance is achieved between operational policing and health and safety duties. Sound health and safety arrangements and clear messaging must be fully integrated into operational policing in order to reduce risks wherever possible.
- 5.4.4. As mentioned in the previous section, assaults on officers are frequent and exposure to potentially traumatic events is fairly commonplace. Both of which can have serious and long-lasting impacts on the officer's health and wellbeing, with many needing to access psychological support due to such events.
- 5.4.5. However, the health and wellbeing of officers is not just at risk from exposure to physical hazards, assaults and potentially traumatic events. The daily grind of a job where the demand is constantly high, the resources are often scarce, and the remit is ever widening, can also have a devastating effect on mental health and wellbeing.
- 5.4.6. The 2018 PFEW Demand, Capacity and Welfare Survey highlighted that 44% of officers felt that their jobs were *very* or *extremely* stressful, which is three times that found in the general population in 2010 (15%),⁸ and has been linked to poor overall wellbeing, low morale, fatigue, presenteeism and leaveism.⁹

⁸ Elliott-Davies, M. (2018). *PFEW Demand, Capacity and Welfare Survey 2018. Headline Statistics. December 2018.* (Report: R101/2018). The Police Federation of England and Wales. Retrieved from:

<https://www.polfed.org/media/15355/demandcapacityandwelfaresurveyheadlinestatistics2018-06-02-19-v1.pdf>

⁹ Houdmont, J., Elliott-Davies, M. (2017). *2016 Police Officer Welfare, Demand, and Capacity Survey Inferential Results December 2017.* The Police Federation of England and Wales. Retrieved from: <https://www.polfed.org/media/14062/pfew-inferential-results-report-27-12-17-v10-002.pdf>

- 5.4.7. Moreover, according to previous work by PFEW it has been estimated that mental health is costing the Police Service between £189.8 million and £229.9 million annually¹⁰ – adding a financial incentive to the moral imperative of supporting officers’ mental health and wellbeing.
- 5.4.8. It is also important to note that supporting the health and wellbeing of officers should not be reactive alone. Proactive protection should also be prioritised, as prevention is always better than cure.
- 5.4.9. Though there is a two-way relationship between health and wellbeing (where health influences wellbeing, and wellbeing influences health), wellbeing also encompasses an individual’s experiences of life and personal circumstances which can include (amongst other things); work, education, finances, social relationships, sleep, recreational activities, security, civic engagement, housing and work-life balance.
- 5.4.10. As such, we would argue that it is essential for the health and wellbeing of officers to be considered holistically (ensuring inclusion of physical, psychological, financial and more general aspects of wellbeing), and to be included as a core element within the Police Covenant; and that this includes devolved competence in Wales.

5.5. **Health and wellbeing – Provisions and the private sector**

- 5.5.1. As highlighted throughout this consultation, police officers do a risky and dangerous job, and are often asked to put themselves in harm’s way (both physically and psychologically) in order to carry out their duties.
- 5.5.2. As highlighted in Section 5.1, officers may experience unique and, in some cases, continuous exposure to events, situations and materials that can be singularly distressing; and as such, psychological harm is a key ongoing concern for PFEW.
- 5.5.3. We believe that officers should be protected from, and supported through, any psychological harm that may befall them, with the same fervour as is done so for physical harm.
- 5.5.4. Although these challenges are not restricted to specialist roles, Child Sexual Exploitation officers provide a good example of where officers might need to continuously engage with distressing materials day-in and day-out, as part of their job. Such circumstances can provide unique challenges to the mental health and

¹⁰ Elliott-Davies, M. & Van Mechelen, D. (2019). *The Cost of Poor Officer Mental Health to the Police Service: A brief view.*

wellbeing of officers, and without proper support the risk of psychological harm increases.

- 5.5.5. Perhaps not surprising then that (as previously mentioned) almost a third of officers surveyed by PFEW in 2018 reported that they have sought help for mental health and wellbeing difficulties associated with, or due to, a potentially traumatic incident that they experienced in the line of duty.
- 5.5.6. Given the above, we feel that it is only proper that the Police Covenant should seek to ensure that officers with any work-related illness or injury (physical or psychological) have priority access to first rate medical care, both in England and in Wales. Safeguarding timely and appropriate medical care for these officers will help ensure that their recovery is as swift and as complete as possible.
- 5.5.7. As officers are at high risk of experiencing psychological harm, and poor mental health and wellbeing is twice as likely to force officers to take significant time off work than physical injuries, we believe that specific mental health provisions for officers should be a prominent and ring-fenced aspect of the Police Covenant.
- 5.5.8. And it isn't just currently serving officers that deserve timely and appropriate medical care. Officers that have retired – or face upcoming retirement- due to ill health (physical or psychological), should also be in receipt of such support.
- 5.5.9. It could be said that medically retired officers are often, in effect, abandoned by the Police Service once they have been exited.
- 5.5.10. Though they may be eligible for financial recompense (in the form of a lump sum), in most cases they have no access to continuing medical care, social support, or contact from their force. This can be a difficult transition for an officer and their family, especially one that has served for many years.
- 5.5.11. Though there are some excellent retirement resources provided by us and other police bodies and companies (such as the National Association of Retired Police Officers and Police Care UK), we feel that officers would benefit from a more constant and comprehensive approach to transition support.
- 5.5.12. The Home Office could consider the development of appropriate exit schemes for officers that are retiring or resigning from service as part of the Police Covenant. This would facilitate access to the appropriate advice and support as and when they need it, and ultimately help to ensure that their transition is as smooth and as positive as possible.

- 5.5.13. We feel that for the Police Covenant to support officers and their families effectively, commitment is required from both central and local government, and the Police Service of England and Wales itself. However, we also believe that there is a role for multiple additional groups, such as charities, communities, volunteers and private business, in fulfilling the covenant pledge.
- 5.5.14. It is the policies, services, products and projects that are built upon the Covenant's founding sentiments that will actually deliver tangible outcomes to officers.
- 5.5.15. In the development and delivery of these services, products and projects, the private, charitable and third sector may have a key to play in supporting our officers.
- 5.5.16. Though there are many excellent resources already in existence, some of these are only available to members of schemes and not all officers subscribe (e.g. the Police Treatment Centres).
- 5.5.17. We want all officers with a need to have access to the best treatment and services available and appreciate the Police Covenant allows an opportunity to work with external charities and providers of these services.
- 5.5.18. In addition, we would be keen to ensure that the any benefits resulting from the Covenant are document by a marked improvement in the quality of life for officers and their families, rather than the profit margins of the providers. We would hope that the Police Covenant would duly consider how to review and ensure service quality and value for money for any project in receipt of Covenant funding, and to ensure that the amount of available resources reflect any rise in officer numbers.
- 5.5.19. We would also welcome special discounts, deals and access to be arranged for appropriate good and services. For example, we would welcome additional discounts on travel (rail and bus) and prescriptions.

5.6. **Support for families**

- 5.6.1. When accepting the Office of Constable, officers also accept a number of restrictions on their private lives that can also impact their families, including where they live and what business interests they can hold.
- 5.6.2. For example, officers are not allowed to reside in premises which are not approved by their Chief Officer, they must also provide written notice of any business interests

they have (or propose to have) so their Chief Officer can determine whether or not the interest is compatible with the officer remaining a member of the Police Force.

- 5.6.3. The same rule applies if a relative included in the member's family has (or proposes to have) a business interest, if the officer believes it could be seen as interfering with the impartial discharge of their duties.
- 5.6.4. However, being a police officer is more than just a job, it is a way of life that can impact on every aspect of an officer's day-to-day existence. Shift-work, overtime, recalls to duty, travelling and staying away from home to provide mutual aid, leave embargos, and cancelled rest days; are all challenges in achieving a good work-life balance and often prohibit officers from spending quality time with the people they love.
- 5.6.5. In addition to the difficulties of managing family life around long working hours and difficult shift patterns, the families of officers must also live in the knowledge that their loved one's safety may come under threat whilst they perform their duties; and if an officer is tragically harmed in the line of duty, it is the family who have to rally round and pick up the pieces.
- 5.6.6. Without the love and support of their families, our members would not be able to do the incredible job that they do; and as such, we believe that supporting their families should remain a core component of the Police Covenant.
- 5.6.7. Although support for families must include delivering peace of mind by ensuring that their serving family member(s) are appropriately protected and supported, we believe that it must also extend much further than this.
- 5.6.8. Families should be officially recognised for the unique role that they play in supporting the police service by ensuring that they have access to appropriate advice and support when needed. For example, the Police Covenant should seek to ensure that families have access to appropriate financial protection, support, and advice as and when needed; especially when there has been serious injury or loss of life.
- 5.6.9. There are ways to provide an official mechanism through which issues affecting the family community can also be raised, and their voices heard. The Armed Forces have various Families Federations, for example. (The Royal Navy Families Federation; the Army Families Federation; and the RAF Families Federation, all of whom have a clear voice in the Armed Forces Covenant.)

- 5.6.10. Families must also feel that their loved ones are appropriately recognised for their dedication and service. Though fair pay and conditions are foundation stones in such recognition, so are the way in which officers are formally and publicly honoured for their achievements. Publicly recognising, celebrating and honouring the achievements of our officers helps to reassure families that the dedication, sacrifice and bravery of their loved ones does not go unnoticed.
- 5.6.11. Formal recognition by the state through the honour system is of particular importance, as it represents meaningful recognition from the sovereign and society which officers have sworn to serve; visibly demonstrating the value of their contribution and public service.
- 5.6.12. However, at present, we feel that the honours and awards system is failing to capture and reflect the dedication, commitment and bravery of all those members of the policing family who selflessly give so much doing their jobs. We believe that there is a lack of formal and state recognition, particularly in relation to bravery.
- 5.6.13. We are not alone in identifying the need for greater recognition of police bravery and distinguished service. In his independent report on police pay and conditions in 2011, Sir Thomas Winsor, (now the Chief Inspector of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services), recommended that a working group be established to consult on awards.
- 5.6.14. In October 2019, we wrote a joint letter to the Home Secretary with our colleagues from The Police Superintendents' Association; The National Police Chiefs' Council; Unison, and; the Association of Special Constabulary Officers. This letter recommended eleven changes to the current system of honours and awards with the aim of increasing the number of officers and staff who are recognised for their bravery and distinguished service.
- 5.6.15. Though we welcome the plans to develop a civil variation of the Elizabeth Cross, we are still actively working with the Home Office to enhance the honours and awards for Police Officers and hope to:

- Introduce a formal link between the PFEW Bravery Awards and the honours process, whereby nominations are reviewed by the Home Office to identify individual officers that may be eligible for other official Queen's honours for bravery, such as the George Cross and the George Medal.
- Create a 'Police Medal for Exemplary Service' that can be awarded for exemplary work that falls short of a QPM and bridge the current gaps in formal recognition.

Response Table

Consultation Question		PFEW response
Q1	To what extent do you agree that it would be beneficial to have a Police Covenant?	Strongly agree
Q2	Please explain your answer	<ul style="list-style-type: none"> • PFEW has been campaigning for the development and implementation of an appropriate Police Covenant along with Police Oracle for several years. • British policing is revered the world over, and our members are the backbone of the service. • Over the last decade, the government has reduced officer numbers and made significant changes to officer pay and conditions leaving those that have remained in service feeling devalued, demoralised and unappreciated. • The development of a suitable and robust Police Covenant would enshrine the government’s obligation to officer welfare in law, and set out their responsibilities in a demonstrable and legal framework; helping to ensure that officers and their families are recognised, protected and supported appropriately by the society which they serve. • However, without additional detail on how the Covenant will be upheld and what tangible outcomes are being pursued as part of the pledge, it is difficult to discern the extent of these benefits; and we hope that the Home Office continues to view the PFEW as a key stakeholder and are open to our continued involvement in the practical development of the Police Covenant.
Q3	To what extent do you agree/disagree that it would be beneficial for the Covenant to be enshrined in legislation?	Strongly agree
Q4	Please explain your answer	5.6.16. For the Policing Covenant to be of any benefit, it must be enshrined in law. Not doing so would undermine the intent of the Police Covenant, eliminate accountability and create disparity with the Armed Forces; and that this includes devolved competence in Wales.

Consultation Question		PFEW response
		<ul style="list-style-type: none"> Such disparity might also be seen as an indication the Office of Constable is regarded as less valuable and with less propriety interest than Military personnel by the Government.
Q5	To what extent do you agree/disagree that the draft Covenant above represents your expectations?	<ul style="list-style-type: none"> PFEW has been involved in early discussions with the Home Office, so the draft Police Covenant does cover the main areas discussed. We want to continue to work with the Home Office to ensure that it is fit for purpose and meaningful.
Q6	Please explain your answer and/or suggest alternative wording.	<ul style="list-style-type: none"> Whilst the Code of Ethics (CoE) applies to Police Officers, it is actually the Standards of Professional Behaviour (SPB) that are included within Police Conduct Regulations. Though we understand the underlying sentiment in referring to the CoE, we feel it would be more appropriate and more accurate to refer to the SPB than the CoE within the context of expected conduct. The wording in relation to whom the Police Covenant is designed to support does not clearly specify whether this includes police staff, and/or those who have previously (but no longer) held the office of Special Constable. Clarification would be needed to ensure the right people get the right support, at the right time. Although there are examples of officers' responsibilities, there are no examples of the consequences that officers face as a direct result of these responsibilities (such the risk of injury and assault). It may be helpful to make these consequences explicit within the wording of the Covenant to demonstrate the need for additional support in accessing health care and support for their wellbeing. It would be useful to include a statement, similar to that included in the Armed Forces Covenant, highlighting that in some cases (especially for those who have given the Police Service the most, such as the injured and bereaved), <i>special consideration</i> is appropriate.
Q7	To what extent do you agree/disagree that it would be beneficial for the Covenant to focus on physical protection?	Strongly Agree
Q8	Please explain your answer	<ul style="list-style-type: none"> For many officers, their day to day work can be full of potential dangers that place them at considerable risk.

Consultation Question		PFEW response
		<ul style="list-style-type: none"> • In 2018/19 there were over 30,000 recorded assaults on police officers in England and Wales, over 10 thousand of which had resulted in injury. • A report produced by the PFEW's Research and Policy Department estimated the full economic and social cost of officer assaults for the year 2018/19, was over three hundred and sixty million pounds. • The protection of our members should not be restricted to their physical protection. • Officers can regularly encounter extremely distressing and/or dangerous events in the line of duty. In fact, 29.9% of respondents from the PFEW Demand, Capacity and Welfare Survey indicated that they had sought help for mental health and wellbeing difficulties associated with, or due to, a potentially traumatic incident that they experienced in the line of duty; 49.5% of whom had sought this help within the previous 12 months. • Psychological harm is a key concern for PFEW, and we believe that this should be protected against, recorded, managed and supported with the same fervour as physical harm. • Although it is unlikely that the role of a police officer will ever be completely without risk; it is the duty of the Police Service and the Government to monitor, manage and minimise the hazards and associated harms to officers as much as possible. • Given the above, not only do we believe that it is imperative to include psychological protection as a core element of the Police Covenant, but we would also encourage the Home Secretary to consider widening the Police Covenant's scope of 'physical protection' to include protecting officers from psychological harm. • However, as highlighted before, without additional detail on how the Covenant will be upheld and what tangible outcomes will be pursued as part of the pledge, it is difficult to discern the extent of these benefits; and we hope that the Home Office continues to view the PFEW as a key stakeholder and are open to our continued involvement in the practical development of the Police Covenant.
Q9	What does physical protection mean to you in the context of policing?	<ul style="list-style-type: none"> • Personal protective equipment (PPE) such as body armour, stab vests, spit guards, riot shields, and CBRN kit are important within the context of physical protection in policing, as are; appropriate uniforms, standard issue equipment (e.g. handcuffs, batons, incapacitant spray, body worn video cameras, communication devices), police vehicles, and safe working environments (e.g. custody suites). • Any and all equipment provided to our members should safe, fit for purpose, reliable, accessible, and regularly reviewed to ensure it remains as such; all working environments should be safe and fit for purpose.

Consultation Question		PFEW response
		<ul style="list-style-type: none"> • However, physical protection is not just about having the right equipment, it is also about having enough officers to meet demand, ensuring that crewing practices are safe, appropriate training (please see our response to Q17 for more details on Training) and creating the appropriate legislation to keep officers safe. • Unless there are enough officers to meet the demands being placed on the Police Service, (nationally and locally), officers are at greater risk of both physical and psychological harm. Workloads can become heavier, back-up can take longer to arrive, stress levels can become higher, and resilience can fall. • Safe crewing practices are another key factor in protecting officers from physical and psychological harm. There is evidence to suggest that single crewing can have negative impacts on the health and wellbeing of officers, and such risks should be taken into account when crewing decisions are made. PFEW stated policy is that officers should not be single crewed as a matter of course and that we support double crewing of members.
Q10	To what extent do you agree/disagree that it would be beneficial for the Covenant to focus on health and wellbeing?	Strongly agree
Q11	Please explain your answer	<ul style="list-style-type: none"> • Police officers do a risky and dangerous job and it is vital that the challenging nature of operational policing and the hazardous environments in which officers are required to work are appropriately recognised, monitored and managed. • Effective health and safety risk management must be integral to the culture of the police service so that the right balance is achieved between operational policing and health and safety duties. Sound health and safety arrangements and clear messaging to officers must be fully integrated into operational policing in order to reduce risks wherever possible. • Given the above, and that there is an expectation for officers to be sufficiently fit and healthy to undertake the role that they are required to perform by their Chief Officer, it is only right that they are supported to maintain good health and are treated fairly if their health suffers in the line of duty. • As such, we believe that the it is imperative that the health and wellbeing (both physical and psychological) of officers should be included as a core element within the Police Covenant.

Consultation Question		PFEW response
		<ul style="list-style-type: none"> • However, as highlighted before, without additional detail on how the Police Covenant will be upheld and what tangible outcomes will be pursued as part of the pledge, it is difficult to discern the beneficial extent of including health and wellbeing within the Covenant.
Q12	What does health and wellbeing mean to you in the context of policing?	<ul style="list-style-type: none"> • As mentioned in Q8, assaults on officers are frequent and exposure to potentially traumatic events is fairly commonplace for our members. Both of these can have serious and long-lasting impacts on both officers' health and wellbeing (both physical and psychological), and many officers need access to psychological support due to one or more of such events. • However, the health and wellbeing of officers is not just at risk from exposure to assaults and potentially traumatic events. The daily grind of a job where the demand is constantly high, resources are often scarce, and the remit is ever widening can also have a devastating effect on mental health and wellbeing. • The 2018 PFEW Demand, Capacity and Welfare Survey highlighted that 44% of officers felt that their jobs were very or extremely stressful, which is not only three times than found in the general population in 2010 (15%), but has also previously been linked to poor overall wellbeing, low morale, fatigue, presenteeism and leaveism. • Moreover, according to previous work by PFEW it has been estimated that mental health is costing the police service between £189.8 million and £229.9 million annually – adding a financial incentive to the moral imperative of supporting officers' mental health and wellbeing. • We would also argue that that the health and wellbeing of officers is a wider issue than just the status of their mental and physical health. Though there is a two-way relationship between health and wellbeing (where health influences wellbeing and wellbeing itself influences health), wellbeing also encompasses an individual's experiences of life and personal circumstances which can also include (amongst other things); work, education, social relationships, sleep and recreation, security, civic engagement, housing and work-life balance. • As such, we would encourage the health and wellbeing (both physical and psychological) of officers should be considered as holistically as possible within the context of the Policing Covenant.
Q13	To what extent do you think that the Covenant should include support for families?	Strongly agree
Q14	Please explain your answer	<ul style="list-style-type: none"> • When accepting the office of constable, officers also accept a number of restrictions on their private lives that can also impact their families, such as where they live and what business interests they can hold.

Consultation Question		PFEW response
		<ul style="list-style-type: none"> • Shift-work, overtime, recalls to duty, travelling and staying away from home to provide mutual aid, leave embargos and cancelled rest days, are all challenges in achieving a good work-life balance and often prohibit officers from spending quality time with the people they love. • In addition to the difficulties of managing family life around long working hours and difficult shift patterns, the families of our officers must also live in the knowledge that their loved one's safety may come under threat whilst they perform their duties. Furthermore, if the unthinkable does happen and an officer is harmed in the line of duty, it is the family who have to rally round and pick up the pieces. • Without the love and support of their families, our members would not be able to do the incredible job that they do; and as such, we believe that support for families should be considered a core component of the Police Covenant.
Q15	What does support for families mean to you in terms of the Police Covenant	<ul style="list-style-type: none"> • Support for families must include delivering peace of mind through ensuring that officers are appropriately protected and supported • The families of officers should also be officially recognised for the unique role that they play in supporting the police service by ensuring that they have access to appropriate advice and support when needed. For example, the Police Covenant should seek to ensure that families have access to appropriate financial protection, support, and advice as and when needed; especially when there has been serious injury or loss of life in the line of duty. • Families must also feel that their loved ones are appropriately recognised for their dedication and service. Though fair pay and conditions are foundation stones in such recognition, so are the way in which officers are honoured and awarded for their achievements. • It may also be beneficial to provide an official mechanism through which issues affecting the family community can be raised and their voices heard.
Q16	Are there any other groups that you think the Police Covenant should cover apart from police officers, e.g. volunteers, retired officers?	<ul style="list-style-type: none"> • While PFEW represents serving police officers up to and including the rank of Chief Inspector in all 43 forces in England and Wales, we believe consideration should be given to those who have left the police service.
Q17	To what extent do you agree/disagree that training can contribute to improved safety?	Strongly agree

Consultation Question		PFEW response
Q18	Please explain your answer	<ul style="list-style-type: none"> • Training is imperative to provide officers with the necessary knowledge and skills they need to protect themselves, their colleagues and the public. Proper provisions have the potential to reduce officer assaults, injuries (both those due to work-related violence, and work-related injuries) and help officers to maintain good physical and psychological health. • Although Personal Safety Training (PST) is a key element in officer protection, there is variation regarding the number of hours dedicated to PST in each force, as well as the types of techniques included in the training. • However, PST is not the only useful training for protecting and maintain the health and wellbeing of officers and there should be consistent provision of other appropriate training (e.g. mental health first aid, Taser training etc).
Q19	To what extent do you agree/disagree that government has a role to play in setting standards for safety equipment for policing?	<ul style="list-style-type: none"> • There should be a national procurement process supported by external experts, such as Health and Safety Executive, to ensure that all equipment and uniform is fit for purpose, consistent and offers the best level of protection to officers.
Q20	Please explain your answer	<ul style="list-style-type: none"> • There are currently different levels of the type, quality, and accessibility of various PPE, standard work equipment, and uniform across the 43 Police Forces of England and Wales; leaving some officers with poorer protection and at greater risk due to the locality in which they serve. • We believe that a national procurement strategy for the provision of goods and services including uniforms, equipment and information technology would benefit the service. This may go some way towards minimising disparity across forces as well as increasing purchasing power and improving the quality of goods. • Without support from the Police and Crime Commissioners and Chief Officers, national specifications for the above would be extremely difficult to develop, maintain or enforce. • Given the above, we can see that there may be some potential benefit to governmental involvement in setting national standards for procurement and safety, with the involvement of external expert agencies, such as Health and Safety Executive.
Q21	To what extent do you agree/disagree that consistent national standards for personal	Agree

Consultation Question		PFEW response
	safety training could contribute to improving safety in policing?	
Q22	Please explain your answer	<ul style="list-style-type: none"> Although we can see the potential benefits in setting consistent minimum standard in terms of accessibility, quality, content and length of Officer (Personal) Safety training (PST), the potential for unintended negative consequences (such as high performing forces subsequently reducing the content and/or length of their PST training to the 'accepted' minimum standards to save costs) would need to be properly explored, discussed and mitigated. As such, we would suggest that if the above is to be considered further, then additional consultation with stakeholders would again be beneficial.
Q23	To what extent do you agree/disagree that personal safety equipment for frontline officers is suitable for a diverse modern police force?	Disagree (based on rationale below)
Q24	Please explain your answer	<ul style="list-style-type: none"> Though there are some pockets of good practice, there are different levels of the type, quality, and accessibility of various PPE, standard work equipment, and uniform across the 43 Police Forces of England and Wales. In some cases, this disparity is not just between forces, but also between specific demographic groups We have seen difficulties with access to and distribution of PPE during the policing of Covid-19 Body armour (BA), for example, currently poses unique challenges for female officers with many reporting that their BA is of poor fit, rendering it uncomfortable and ineffective. There is also the potential for an individual's sizing needs to change quite rapidly over time (for both male and female officers); causing a challenge in ensuring that BA remains fit for purpose after the initial fitting. These disparities result in some forces having PSE that is more suitable for a modern and diverse police force than others. However, on the whole, we believe that providing officers with PPE, PSE, uniforms etc that is suitable for a diverse and modern police force is a challenge that has not yet been met
Q25	To what extent do you agree/disagree that a Police	Yes, the Police Covenant has the potential to address wellbeing issues at a national level

Consultation Question		PFEW response
	Covenant would address wellbeing issues at a national?	
Q26	Please explain your answer	<ul style="list-style-type: none"> • Whilst we agree that the Police Covenant provides an opportunity to address police wellbeing at a national level, the extent to which this is realised depends on how the Police Covenant pledge is delivered and the subsequent development of tangible outcomes. • Without additional detail on how the Police Covenant will be upheld and what tangible outcomes are being pursued as part of the pledge, it is difficult to comment further.
Q27	To what extent do you agree/disagree that safeguards should be put in place to ensure those serving within police are able to quickly access medical care for matters arising as a result of their position?	Strongly agree
Q28	Please explain your answer	<ul style="list-style-type: none"> • As highlighted throughout this consultation, police officers do a risky and dangerous job, and are often asked to put themselves in harm's way (both physically and psychologically) in order to carry out their duties. • As such, we feel that it is only proper that the Police Covenant should seek to ensure that officers with any work-related illness or injury (both physical or psychological) have priority access to first rate medical care: and this encompasses devolved competence in Wales. Safeguarding timely and appropriate medical care for these officers will help ensure that their recovery is as swift and as complete as possible.
Q29	To what extent do you agree/disagree that there needs to be specific mental health provisions for those working in policing?	Strongly agree
Q30	Please explain your answer	<ul style="list-style-type: none"> • As highlighted in Questions 8 and 9, officers may experience unique and, in some cases, continuous exposure to events, situations and materials that can be singularly distressing; and as such psychological harm is a key concern

Consultation Question		PFEW response
		<p>for PFEW, and we believe that this should be protected against, recorded, managed and supported with the same fervour as physical harm.</p> <ul style="list-style-type: none"> • Although these challenges are not restricted to specialist roles, Child Sexual Exploitation officers provide a good example of where officers might need to continuously engage with distressing materials day-in and day-out as part of their role. Such circumstances can provide unique challenges to the mental health and wellbeing of officers, and without proper screening and support the risk of psychological harm increases. • Perhaps not surprising then that, as mentioned previously, almost a third of officers surveyed by PFEW in 2018 reported that they had, at some point during service, need to seek help for mental health and wellbeing difficulties associated with, or due to, a potentially traumatic incident that they experienced in the line of duty. • Given that officers are at high risk of experiencing psychological harm and the poor mental health and wellbeing is twice as likely to force officers to take significant time off work than physical injuries, we believe that specific mental health provisions for officers would need to be a fundamental part of the Policing Covenant.
Q31	To what extent do you agree/disagree that the private sector has a role in supporting police wellbeing needs?	Agree
Q32	Please explain your answer	<ul style="list-style-type: none"> • We feel that for the Police Covenant to support officer and their families effectively, commitment is required from central and local government, and the police service itself and this must encompass devolved competence in Wales. • However, we also believe that there is a role for multiple additional groups, such as charities, communities, volunteers and private business, in fulfilling the Covenant pledge; and charities in Wales must not be disadvantaged financially through devolved functions if providing medical care in Charitable status hospitals.
Q33	How do you think the private sector can support police wellbeing?	<ul style="list-style-type: none"> • Though the Police Covenant pledge creates and documents commitment from key stakeholders and partner agencies, it is the policies, services and projects that are built upon these founding sentiments that will deliver tangible outcomes to officers, including devolved local government in Wales. • In the development and delivery of these services and projects the private, charitable and third sector may have a key role within supporting Police Wellbeing; however, as explained in Q32, charities in Wales must not be disadvantaged financially through devolved functions if providing medical care in Charitable status hospitals.

Consultation Question		PFEW response
		<ul style="list-style-type: none"> • Though there are many excellent resources already in existence, some of these are only available to members of their scheme (such as the Police Treatment Centres), and not all officers subscribe. In an ideal world, we would encourage a fully funded model whereby treatment and services are available to all officers that are in genuine need. • In addition, we would be keen to ensure that the any benefits resulting from the Covenant are document by a marked improvement in the quality of life for officers and their families, rather than the profit margins of the providers. We would hope that the Police Covenant would duly consider how to review and ensure service quality and value for money for any project in receipt of Covenant funding, and to ensure that the amount of available resources reflect any rise in officer numbers. • We would also welcome special discounts, deals and access to be arranged for appropriate good and services. For example, we would welcome additional discounts on travel (rail and bus) and prescriptions
Q34	To what extent do you agree/disagree that society already recognises the sacrifices made by the police and their families?	Disagree
Q35	Please explain your answer	<ul style="list-style-type: none"> • We believe that, in general, the public hold the police in high regard and many recognise the sacrifices made by officers to some degree. • This can be evidenced by most recent data from the Office for National Statistics on public satisfaction with policing; where 75% of respondents said that they had confidence in the police.¹¹ • Moreover, research commissioned by the HMICFRS in 2018 found that satisfaction with the police is also high, and that when asked to provide reasons for why they were satisfied respondents commonly mentioned they the police were doing a good job and recognised that the job was difficult and high pressured.¹² • However, we also believe that there is currently a lack of formal and state recognition, particularly in relation to bravery, that needs to be addressed.

¹¹ ONS <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingmarch2019>

¹² https://www.bmgresearch.co.uk/wp-content/uploads/2019/01/1578-HMICFRS-Public-Perceptions-of-Policing-2018_FINAL.pdf

Consultation Question		PFEW response
Q36	What methods of recognition in the policing context are you aware of?	<ul style="list-style-type: none"> • In addition to the honours and awards listed in Q39, we are aware that there are plans to develop a civil variation of the Elizabeth Cross; which we warmly welcome. • There are also the PFEW Bravery Awards and a number of specialist PFEW awards for specific roles (such as Detectives, Custody and Roads Policing), as well as local commendations from Chief officers and individual forces. • However, as mentioned above in Q33, we believe there is a lack of formal and state recognition of Police Officers – especially in relation to bravery.
Q37	To what extent do you agree/disagree that memorials, the honours system, police sector awards and other forms of recognition are important in helping families to feel supported?	Strongly agree
Q38	Please explain your answer	<ul style="list-style-type: none"> • Publicly recognising, celebrating and honouring officers plays an important role in supporting both officers and their families. • It helps to reassure families that the dedication, sacrifice and bravery of their loved ones does not go unnoticed, that their commitment and continuing service is greatly appreciated and highly valued. • Formal recognition by the state through the honour system is of particular importance as it represents meaningful recognition from the very sovereign and society which officers have sworn to serve; uniting the country by visibly demonstrating the value of their contribution and public service.
Q39	To what extent do you agree/disagree that the honours/medals available for police (Gallantry awards, Empire awards, Queen’s Police Medals, Police Long Service and Good Conduct Medal, Special Constabulary Long Service Medal)	Disagree

Consultation Question		PFEW response
	appropriately recognise the bravery, service and commitment of those involved in policing?	
Q40	Please explain your answer	<ul style="list-style-type: none"> • As mentioned in Q33 and Q36, the PFEW believes that there is a lack of formal and state recognition, particularly in relation to bravery. • At present, we feel that the honours and awards system is failing to capture and reflect the dedication, commitment and bravery of all those members of the policing family who selflessly give so much doing their jobs. • We are not alone in identifying the need for greater recognition of police bravery and distinguished service. In his independent report on police pay and conditions in 2011, Sir Thomas Winsor, (now the Chief Inspector of Her Majesty's Inspectorate of Constabulary and Fire and Rescue Services), recommended that a working group be established, with representation from police staff associations, to consult on awards and he suggested that any award be proportionate to rank, structure and size of force. • In October 2019, we wrote a joint letter to the Home Secretary with our colleagues from The Police Superintendents' Association; The National Police Chiefs' Council; Unison, and; the Association of Special Constabulary Officers. This letter outlined eleven changes to the current system of honours and awards for consideration with the aim of increasing in the number of regular police officers, members of the Special Constabulary and police staff who are recognised for their bravery or distinguished service. • Though we welcome the plans to develop a civil variation of the Elizabeth Cross, we are still actively working with the Home Office to enhance the honours and awards for Police Officers and hope to: <ul style="list-style-type: none"> ○ Introduce a formal link between the PFEW Bravery Awards and the honours process, whereby nominations are reviewed by the Home Office to identify individual officers that may be eligible for other official Queens honours for bravery such as the George Cross and the George Medal. ○ Create a 'Police Medal for Exemplary Service' that can be awarded for exemplary work that falls short of a QPM and bridge the current gaps in formal recognition.

Consultation Question		PFEW response
Q41	To what extent do you agree/disagree that honours are important in helping families to feel supported?	<ul style="list-style-type: none"> Strongly agree
Q42	Please explain your answer	<ul style="list-style-type: none"> As mentioned in Q38, PFEW believe that formal recognition by the state through the honour system is of particular importance as it represents meaningful recognition from the sovereign and society which officers have sworn to serve; uniting the country by visibly demonstrating the value of their contribution and public service.
Q43	To what extent do you agree/disagree that a Police Covenant could add value in helping families to feel supported?	<ul style="list-style-type: none"> Strongly agree
Q44	Please explain your answer	<ul style="list-style-type: none"> Whilst we agree, in principle, that a Police Covenant could add real value in helping families to feel supported, the extent of which is heavily reliant on how the Covenant pledge is realised. Without additional detail on how the Covenant will be upheld and what tangible outcomes are being pursued as part of the pledge, it is difficult to comment further. We hope that the Home Office continues to view the PFEW as a key stakeholder when discussing these important details, and are open to our continued involvement in the practical development of the Police Covenant.
Q45	Do you have any other comments to make on the issue of the Police Covenant not specifically addressed by any of the questions above?	<ul style="list-style-type: none"> Please see the main body of the consultation response and example outcomes on next page.

Example outcomes

In addition to gathering evidence and comments from the PFEW National Board, we also asked the PFEW Wellbeing Leads for their ideas and views too. Most are incorporated in the body of this consultation response and others are listed below. While we appreciate there is not supporting evidence for all the points listed, we feel it is important that their views are shared and considered as part of a Police Covenant:

- Funding and expansion of trusted and established providers of health and wellbeing services for police (such as can be found here <https://policecharitiesuk.org/charities-list/for-police-officers/>) to enable access by all officers in genuine need.
- Enforcing the formal recording of psychological injuries as injuries on duty.
- Priority access to first rate medical care for officers with work-related illness or injury (physical or psychological).
- The development of appropriate exit schemes for officers that are retiring or resigning from service, as part of the Police Covenant.
- Formal recognition of all retired or resigned officers as Police Veterans with a national ID card scheme.
- Cheaper travel (rail and or bus) for officers and direct family members.
- Cheaper NHS prescription charges in England, or free if the medication is needed from a registered injury on duty (Prescriptions are already free in Wales).
- The removal of legal action regarding school absence for police families, and that this encompasses devolved competence in Wales, as many officers struggle to get time off work, especially during the summer months.