



Submission to

The Police Remuneration and Review Body

on behalf of

the Police Federation of England and Wales (PFEW)

and

the Police Superintendents' Association (PSA)

8th February 2019

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

Dear Ms Bharucha

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

This year's remit letter covers a number of matters that it is essential to get right. These include the NPCC's new reward framework design principles, assumptions, project plan, and risks; the degree to which the staff associations are being engaged with, and our views considered; and the immediate matters of this year's pay award and Police Constable Degree Apprentice (PCDA) progression pay.

On each of these, we respect our duty to represent our members. Moreover, in keeping with the PFEW core purpose we must ensure that our members are informed and that there is the highest degree of transparency in decision-making; act in the interests of our members and the public; and work together within the Federation and in partnership with others in the policing world to achieve our goal. We can do this best by submitting evidence to you that is honest and evidenced. There are messages within this submission that may be uncomfortable reading for both the employers and government. However, these are raised in the spirit of seeking progress, and a better way of working in the future.

We make nine key recommendations. These include our reiteration of the PRRB's own recommendation last year, that the scope of pay reform must be reduced and prioritised. We also recommend actions to allow greater scrutiny of the true costs to the public purse of the pay reform programme. We have used the NPCC's own mechanism for calculating pay, and

the results are shocking. It leads to the conclusion that officers are paid significantly below where they should be. For the NPCC to demonstrate goodwill, and commitment to their officers (and their own pay reform mechanism), we recommend a pay increase of 5% in each of the next three years.

This is a long and detailed submission, reflecting the breadth of issues. We are grateful to the PRRB for its consideration of our evidence. You will be aware that following last year's failure by the government to ratify the PRRB recommendations we are pursuing a judicial review of the process then undertaken. We assure you that this is not reflective of any unease regarding the PRRB, whose deliberations we have always appreciated, and with whom we hope to continue a positive working relationship.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Alex Duncan', with a long horizontal flourish extending to the right.

Alex Duncan, National Secretary of PFEW

A handwritten signature in black ink, appearing to read 'Dan Murphy', with a long horizontal flourish extending to the right.

Dan Murphy , National Secretary of PSAEW

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

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1 Chapter 1 Executive Summary

1.1.1 There are a number of matters we raised in our submission last year that were outside the scope of the remit letter. These were largely to do with the process for the Police Remuneration Review Body (PRRB) and related bodies concerned with police pay, such as the Police Consultative Forum (PCF). We are grateful that the remit letter this year seeks the PRRB consideration of the extent to which the staff associations have been involved in the design of the pay reform programme, and that the PCF is being reviewed by the Home Office.

1.2 The remit letter

1.2.1 We received the remit letter on 19th December 2018.

1.2.2 We note that the Home Secretary has asked that the PRRB continue to play a key role in “the ambitious programme of reform that is being led by the National Police Chiefs’ Council (NPCC)”, and that he seeks their view on “the detailed proposals that are now emerging”. In light of this the letter specifies 5 matters for recommendations:

1. How to apply the pay award for 2019/20 for police officers of all ranks, including chief officers, in the context of how it will support overarching NPCC proposals and timetable for a new pay structure.
2. To review the NPCC’s design principles, framework and assumptions for pay reform; and to provide views on the extent to which the views of the staff associations have been considered in the development of the design.
3. To review the NPCC’s detailed project plan and risk register and provide observations on the timescales for implementation, taking into account the requirement for formal consultation with the staff associations and the need to make legislative changes.
4. To review the NPCC’s proposals for progression pay for police apprentices.
5. To review proposals from the NPCC in relation to making payments to the superintendent ranks for undertaking each 24 hour on-call period.

1.2.3 It further states

“The Government must balance the need to ensure fair pay for public sector workers with protecting funding for frontline services and ensuring affordability for taxpayers. There will still be a need for pay discipline over the coming years to ensure the affordability of public services and the sustainability of public sector employment. I would ask that you continue to make affordability a major consideration when making your recommendations. This year, I also request that you describe in your final report what steps you have taken to reflect affordability in reaching your recommendations.

Only by properly targeting pay awards can we ensure we recruit and retain the best public sector workers where they are needed most. I am seeking the PRRB’s views on the optimal allocation of additional investment in pay for the police in 2019/20 to ensure recruitment and retention pressures are properly addressed, and ask that you outline the approach you have taken to targeting in your final report.

As in previous years, in considering the appropriate level of pay for police officers I would also ask you to have regard to the standing terms of reference as set out in previous remit letters and to consider each matter for recommendation in the context of future reform plans.”

1.2.4 In this submission we will provide the staff associations’ perspectives on all, with supporting data, case studies, and, where appropriate, correspondence between ourselves and the National Police Chiefs’ Council (NPCC) where we have set out our position and – in many cases – sought a change in theirs.

1.2.5 Our consideration of how the pay award this coming year should be applied necessarily flows from the current state of the pay reform programme. Therefore in order to provide a logical narrative that allows the reader to follow that story through, we will address the remit letter questions in a different order to the way they appear in the letter: that is, we will address the questions about the NPCC pay reform programme design principles, project plan, and so on first, (in Chapter 2) and then the key question of how to apply the pay award (in Chapter 3).

1.3 Pay reform: Design principles and assumptions

1.3.1 With regard to the design principles, we have always maintained that it is essential that these are properly bottomed out before the design is conducted. That would enable clarity for all, and crucially it would allow proper consideration to be given to the provision of a benefits realisation model, so that the NPCC could track whether the programme is meeting its intended principles and aims or not. This was the method used by the Ministry of Defence when Armed Forces pay and conditions were changed, under the New Employment Model.¹ We cannot see that it is sensible to do otherwise: indeed, retrospectively developing design principles, after the 4 components of the changes have been announced, fudges the issue and could allow the NPCC to claim success almost regardless of outcome. However, our concerns have repeatedly been met with the answer that the NPCC intend to firm up the design principles in phase 2. We believe this is not acceptable, either to the staff associations, nor is it in the public interest. If the NPCC do not set out firm and measurable criteria for success at the outset, then in what way can they actually be held accountable for the public money that is spent on this reform? How can the public be satisfied that it is worthwhile?

1.3.2 In addition, we wrote to the NPCC in October 2018 stating that we believe the principles to be overly complex, and contradictory. We provided suggestions as to how these might be improved and rendered suitable for use. We have had an acknowledgement of this letter, but it would appear than none of the comments have actually been used to shape the work as yet. (See annexes 1 and 2).

1.4 The extent to which the views of the staff associations have been considered

1.4.1 In the submission which follows we will set out our concerns regarding how the staff associations' input has been considered during informal discussion of the pay

¹ The New Employment Model was underpinned by an intention to support operational capability. From the early stages, the intended outcomes were set out as being attractiveness, agility, and affordability. Output and outcome measures were determined (including measures of negative impact) and the programme tracked against these. See Qinetiq report 2013, Malcolmson, J, Guest, D, Bourne, M: New Employment Model, Benefits Realisation, and <https://www.gov.uk/guidance/new-employment-model>

reform work, and how it has been considered during meetings of the only forum that we have for this: the voluntary Police Consultative Forum.

1.4.2 We believe the most transparent way to do this is to provide the PRRB with sight of some of the correspondence between the associations and the NPCC. We believe this correspondence reveals a pattern wherein we are invited to provide commentary and concerns. On receipt of our detailed comments, the NPCC acknowledges these, but merely states that the reform is a work in progress and these may be resolved at a later unspecified date – e.g. “during phase 2”. In other words, we see little by way of substantive action and amendments based on our input.

1.4.3 With regard to the Police Consultative Forum, our view is that this is not functioning as was intended when it was set up (by the staff associations, the NPCC, and the APCC), nor in accordance with the Terms of Reference then drafted. In the submission which follows, case studies are provided. We have sought a review of this – and indeed of the wider landscape with regard to the mechanisms through which police pay and conditions are considered. These include the Police Advisory Board and the College Regulatory group. We are heartened that the Home Office has heard our concern on this, and has announced a review of the Police Consultative Forum. We support this completely, seeking an independent Chair and secretariat. We have provided a letter to the Home Office setting out our key concerns, and this is at annex 3.

1.4.4 We have made nine recommendations for changes to the PCF (set out in chapter 2) and one further broader recommendation, which is that consideration be given to the entire landscape for engagement and consultation, including the College Regulatory Group and Police Advisory Board, as the lack of clarity over jurisdictions is causing significant impacts.

1.5 The project plan and risk register, including timescales for consultation

1.5.1 We remain concerned that the setting out of the project plan is in its infancy. We wrote to the NPCC expressing our concern that contingencies and dependencies for this work have not been identified. In response, the NPCC provided a high level document showing that there is a relationship between the College of Policing programme and the NPCC programme. (Figure 1). However, in this, as in other documents supplied to date, there is no consideration of how other work

also feeds in: for example there is no reference to the Home Office's input nor to the staff associations'. There is no acknowledgement that, for example, it would be sensible (if not essential) to determine and agree the design principles at the outset, rather than suggesting these can be changed as the project progresses. The regulatory changes needed have not been identified, nor have we seen any outline of when and how these changes might fit with the legislative timetable in parliament. This is simply inadequate at this point in the work programme.

- 1.5.2 Not only would the setting out of contingencies and dependencies enable other organisations to plan, but it would give some reassurance that the overall programme will have proper governance, with check and balances built in to ensure that the final pay reform is legally compliant and workable. As examples, we would like to see planning built in for reviews of Equality Impact Analyses. We would like the further development of work to be considered to be contingent on agreed principles. We would like the calculation of pay to be dependent on agreed benchmark data.
- 1.5.3 The risk table is inadequate. We strongly agree one stated risk, that "the current programme timeline is unrealistic". The PRRB suggested last year that the NPCC prioritise which change is needed. To date we have seen no signs of this, nor have our views been sought as to which elements it might be acceptable to prioritise. We have sought to have these conversations.
- 1.5.4 At this point, in order to avoid simply lurching from one activity to the next, it is necessary that there should be a detailed plan of who needs to be involved when, and which tasks need to be taken in what sequence. The current method of working cannot be cost effective to the public purse.
- 1.5.5 Recommendation 1: We seek for the PRRB to require that the NPCC set out a full and proper project plan, including a workable level of detail, within a set period. We believe three months from the PRRB deliberations should be appropriate.
- 1.5.6 Recommendation 2: That the PRRB insist that the Home Office, NPCC, and staff associations determine which elements of the pay reform should be prioritised, as the NPCC have not actioned this since last year. The scope must be reduced significantly if there is to be any chance of success.

1.6 The evidence base

- 1.6.1 It will become apparent when reading our views on the design principles, project plan and risks, and other aspects of the pay reform programme that we remain deeply concerned about the evidence base with which the NPCC are developing their reform programme. There is a paucity of baseline data, such as detailed recruitment / retention information, which is disappointing, albeit we understand that a lack of attention to this over a period of years (which we have noted in previous submissions) is not something that can be addressed instantly. However what is of even more concern is that the NPCC's manner of working, which demonstrates a lack of broad scanning to consider unintended consequences, (such as equality impacts), and a lack of a clear narrative linking NPCC changes to anticipated benefits and consequences, means that it has not been possible for the NPCC to properly plan for future evidence gathering, such as how they will track the impact of any changes made. This is not acceptable, as it means the cost and benefits to the taxpayer are not being attended to: nor, we believe, are the employer's responsibilities being addressed.
- 1.6.2 Further, we are concerned that whereas the original aim in setting up the PCF was to agree data that would be used in both the employer and staff association submissions, that has not been the case. As an example, one of the themes of this submission is that we are concerned that the data set that the NPCC have been using for benchmarking purposes is inappropriate. Benchmarking is the cornerstone of the process that the NPCC have set out for deciding pay levels: for that reason, we believe that agreeing on the dataset to be used should be a fundamental part of the consultation process. Without agreeing this, it will be hard for the staff associations to have faith in the integrity of the pay reform. At this point we are unclear what data set the NPCC intend to use, and recently supplied documents do not make allowance for the P factor calculation in the way that previous ones did.
- 1.6.3 In the following submission we draw on a range of evidence, including data and reports by organisations such as Nat Cen, Police Mutual, and XpertHR. We also draw widely on our own Through Career research programme, which includes national surveys directed to all new starters, those at the Assessing and Recognising Competence (ARC) point, and leavers, as well as a national survey of Pay and Morale, open to all officers. We have endeavoured to start to track the

impact of some of the changes made, such as the introduction of ARC, and the PCDA scheme. It is quite unusual for staff surveys to meet the rigorous requirements of academic journals for publication: nonetheless we believe that publication in peer reviewed fora are important to verify our work, and demonstrate its validity, reliability and quality. We have therefore published in a range of peer reviewed journals and conferences. (See annex 9 for a list).

1.7 The content of the NPCC design

- 1.7.1 There are four major strands of the pay reform design: Constables' pay scale, benchmarking, the P factor, and variable pay.
- 1.7.2 We believe the Constables' pay scale, as currently envisaged, is overly complex, impractical, and likely to lead to bureaucracy without a tangible benefit. We do not believe it is in the public interests, being a costly system for which no robust cost-benefit analysis has ever been conducted.
- 1.7.3 Moreover, we understand from discussion at the College of Policing's Professional Development and Progression Board meeting that the NPCC have indicated that they intend that progression through the Higher Skills assessment (to Established Constable) will be the only way to access £10,000 on the future Constable pay scale. We are deeply concerned at this, because without a robust equality impact assessment of the process we could not agree this. It is disappointing that the NPCC announced this at the PDP, rather than bringing it to the PCF for discussion. Further, in previous conversations with the NPCC we were led to believe that the NPCC position was similar to ours: that there should not be a huge jump at any point on the pay scale, and that rather the scale should allow smoother progression than is currently the case. Unfortunately it would appear that the College will be put in an invidious position by this scheme.
- 1.7.4 We recommend that a full cost benefit analysis of the existing ARC process is undertaken. Only if it can be proved to be worth the outlay in terms of cost and time, should the NPCC proceed with plans for a Higher Skills assessment point linked to pay.
- 1.7.5 We understand the NPCC rationale for benchmarking. We are concerned about the choice of comparator group (or groups), as these must now, we believe, be degree level jobs, (such as ASHE APT) and not the broader spectrum of jobs that the NPCC has used until now.

- 1.7.6 The P factor is the element of the design on which there is most agreement. Broadly we are content that the P factor definition is reasonably comprehensive, albeit we envisage a few amendments. We accept the method proposed by the NPCC whereby officer pay is benchmarked against a median, and then an additional X / P factor is added on top. This offers procedural justice.
- 1.7.7 Where we disagree is with regard to the level of the P factor. The NPCC initially placed this at only 8% - the level Winsor chose for the danger and deployability component only. More recently, the NPCC have valued this at 10%. We believe it should be at the same level as the military X factor: around 14%.
- 1.7.8 In the absence of any other information about, or discussion of, which elements of Variable pay the NPCC wish to bring to the PRRB this year, we must provide comments based on the paper to Chiefs' Council dated 16th January 2018. We understand that the NPCC intend to make two recommendations: one relating to the new targeted Bonus payments, and one relating to London and SE Allowances.
- 1.7.9 Targeted Bonuses were introduced last year. The staff associations agreed these at PCF, as had we not done so, then we were concerned that officers would lose pay. Nonetheless we expressed significant concerns about the proposals. Chief amongst these was that discretionary pay is often the cause of unfairness in pay.
- 1.7.10 So, whilst we welcome the recommendation to continue this bonus payment, for the time being, we are extremely cautious about the NPCC wording of their recommendation, which is "Subject to feedback ...to recommend the extension of the scheme on a permanent basis as a means of recognising additional skills".
- 1.7.11 Recommendation 4: We therefore recommend that, while the Bonus payments should continue for now, there needs to be an opportunity to review: the circumstances under which they are paid; the impact on equal pay; and the guidance around their use, perhaps by incorporating more standard criteria.
- 1.7.12 We believe that the London and SE Allowances need to be considered together, as there is a danger that if they are out of kilter then officers will be poached between forces. We understand the NPCC intends to recommend that there is "further work to update the London and South East allowances in terms of both structure and value. The basic format to remain unchanged for 2019/2020". But we believed this work would be conducted following last year's submission, and

are disappointed that progress does not appear to have been made.

1.7.13 Recommendation 5: We recommend that a review is undertaken including both the London and SE Allowances, but that in the meantime the discretionary element is removed from the SE Allowances; all SE Allowances are set at the upper limit permissible (currently £3,000); and that both the London and SE Allowances are updated in line with inflation.

1.8 The uplift case

1.8.1 Our uplift case consists of three sections:

- First, we set out the economic context and the impact on officers.
- Second, we follow the NPCC's mechanism for calculating fair pay: that is, we benchmark existing pay against appropriate comparators, and then add the P factor (at both the NPCC's favoured level, 8-10%, and the level we believe is appropriate, 14%)
- Third, we consider the affordability of the uplift in light of the pay settlement for 2019/202, and the increase in funding for forces.

1.8.2 Our analysis of the economic context reveals that below inflation pay rises officers have fallen approximately 18% below where they should be, since 2010.

1.8.3 Sadly, this means that many officers are struggling financially, with only 41% saying they have enough money to cover all essentials every month, and 45% saying they worry about the state of their finances every day, or almost every day.

1.8.4 Our calculations of the difference between current levels of pay and fair levels, based on the NPCC's mechanism, reveal that with the P factor at 14% Constables are between 14.7% and 18.4% below where they should be (depending on pay point), while Sergeants are up to 19.4% below.

1.8.5 For Constables to reach the lower acceptable level of pay, where P is set at 10%, and inflation is factored in, they would need an average (across all three pay points) rise of 6.2% each year for three years. Sergeants would need an average rise across pay points of 5.85%. Even ignoring inflation the rises would need to be 4% and 3.6% each year, respectively.

1.8.6 We recognise that these figures are unlikely to be palatable to either the employer or government. For that reason, we understand that it is unlikely that there will be

a “quick fix”. Sorting out the shortfall that has been created following several years of austerity is unlikely to happen within a three year window. Nonetheless, we believe it is essential that the NPCC demonstrates their commitment to the mechanism that they themselves have designed and trumpeted. We need to see that there is a meaningful direction of travel towards the level of pay that we have calculated by benchmarking against appropriate comparators, and adding the P factor.

1.8.7 Recommendation 6: We therefore recommend an across the board pay uplift for the next three years, which would allow the NPCC to demonstrate that commitment. We seek a deal of 5% in year 1, followed by a further 5% in each of years 2 and 3. This compromise would enable some movement towards the overall rectification of the gap between current pay level and just pay levels. It would ensure that, once the gap had started to be closed in year 1, in years 2 and 3 it would not become worse again, as pay would at least keep up with inflation. It would further ensure that none of the ranks – for whom, ultimately, differing degrees of reparation may be needed – have increases that worsen those existing differentials.

1.8.8 We would further seek that in future years, beyond these three, the NPCC would continue to work towards implementation of this pay mechanism.

1.8.9 Should it not be possible to agree a three year settlement, then in order to provide some confidence that the NPCC intend to make good on their promises regarding their intentions to take pay to the level indicated by the mechanism they devised, and to start to redress the suppression of pay over the last several years, we seek an uplift of 6.2% this year, which would at least be in keeping with the average increase that we have calculated would be needed for Constables over each of the next three years.

1.9 NPCC proposals for progression pay for Police Apprentices

1.9.1 In the update on Pay Reform to Chiefs’ Council on 16 January the NPCC sought approval of a recommendation that “progression for Apprentices and DHEP will be determined locally by chief officers with an expectation that they will reach the

foundation constable point (circa. £25,000p.a.) upon graduation”.²

- 1.9.2 To set this in context, last year we received no proposal on starting salary for apprentices: the NPCC simply referred a salary of £18,000 straight to the PRRB. The PRRB approved a starting salary of £18,000, but said apprentices should move to the next pay point (1 or 2, depending on starting salary) automatically after twelve months. The PRRB specified then that the NPCC should develop proposals for progression pay.
- 1.9.3 Despite being asked to provide a proposal for PCDA progression pay a year ago, the NPCC has failed to develop and deliver a workable proposal. Nothing was brought to the PCF, even on an informal basis. To be clear, there was absolutely no warning of the content of the recommendation fielded at Chiefs’ Council, until the day before.
- 1.9.4 We consider this recommendation to be a failure to take responsibility to provide national pay progression rates, in accordance with the NPCC’s pay principles. We are concerned that it demonstrates a shift away from focusing on a national fair level of pay for the role done. It is also disappointing that, again, it means a lack of consultation over pay.
- 1.9.5 The recommendation represents a major shift away from the use of a mandated pay scale, to Chief Officer (not Chief *Constable*, but Chief *Officer*) discretion regarding how new entrants will be paid during the first years of service. Such a significant shift needs proper consideration and debate.
- 1.9.6 In absence of any employer research into how the PCDA scheme is working in practice, with regard to the pay element, we have conducted research on the experiences of the PCDAs in service. Of those we interviewed, only one candidate applied to the PCDA scheme: the others were only told that was the route that was open after they had applied. Some were not even made aware that they were being recruited under this scheme (nor of the financial implications) until a few days before they joined. Several say that they were willing to accept a starting salary as low as £18,000 only because they believe they will progress up the existing pay scale, as would any other recruit. We therefore believe these officers

² Chief Constables’ Council Pay Reform Briefing 16th January 2019, Agenda Item 9, author CC Francis Habgood. (Document supplied by email, 15th January 2019).

have a legitimate expectation of progression equal to their peers.

1.9.7 Recommendation 7: We believe it is only right that the PRRB should reject completely the NPCC proposal. We are grateful that in the past the PRRB has been supportive of the PCF. We believe that in this case, the PRRB must remit the consideration of PCDA progression pay back to the PCF. In the meantime, we believe those on the PCDA scheme should progress along the existing Constable pay scale, to point 1 or 2 after twelve months, and then in the way that all other entrants do. We are unsure why the NPCC has seen fit to hijack this opportunity to insert recommendations for DHEP pay into the PRRB submission. This is not within the remit letter.

1.10 On Call

1.10.1 The remit letter this year refers to Superintendents' On Call Allowance, rather than the On Call Allowance for all. Nonetheless, we understand the NPCC will be making a recommendation for all ranks.

1.10.2 On Call Allowance was introduced by Winsor. However, prior to this the PNB had been discussing an on-call allowance, and Staff Side had submitted a claim. The reasoning for the claim at that time was that the use of on call was increasing and that an allowance should be introduced to reduce the reliance by forces, on On Call. When Winsor recommended it in 2011 he said that the rate of the allowance should be reviewed after three years - which would have been 2014.

1.10.3 In November 2018 the NPCC asked us for comments on a survey that it had drafted regarding the On Call Allowance. We hoped that the survey might be part of the review of On Call that Winsor, and latterly the PRRB, had suggested. We made a number of comments on the survey, within the deadline requested, and stated that we could not agree the data from the method we had been shown, as unfortunately we believed the method had significant flaws. Reviewing the survey took considerable time and resource: yet we were subsequently informed that it had actually been sent out to force contacts (some HR departments, some others) before our comments were received.

1.10.4 Recommendation 8: In absence of a full review of the allowance usage and amount, as sought by Winsor, the PRRB, and the staff associations, we recommend that officers are paid the same rate as staff members: £29.17 per day. We see no reason for the discrepancy. Further, we believe this should be paid to

all ranks. This would be in keeping with the NPCC's aspiration that staff and officer pay be better aligned. It would be a quick win for them along that journey. Further, we would therefore expect future On Call Allowance payments to be in line with awards at Police Staff Council.

1.11 Summary of our recommendations:

- 1.11.1 Recommendation 1: We seek for the PRRB to require that the NPCC set out a full and proper project plan, including a workable level of detail, within a set period. We believe three months from the PRRB deliberations should be appropriate.
- 1.11.2 Recommendation 2: That the PRRB insist that the Home Office, NPCC, and staff associations determine which elements of the pay reform should be prioritised, as the NPCC have not actioned this since last year. The scope must be reduced significantly if there is to be any chance of success. Specifically, we seek for the principles to be reduced to a manageable number, and to include only those that we agree, these being to deliver a national pay structure; to limit bureaucracy but be robust enough to support evidence based decision making; to support the closure of the gender pay gap; and to be sustainable into the long term.
- 1.11.3 Recommendation 3: We recommend that, in the interests of openness and transparency, and achieving appropriate expenditure from the public purse, a full cost benefit analysis of the existing ARC process is undertaken. Only if it can be proved to be worth the overlay in terms of cost and time, should the NPCC proceed further with plans for a Higher Skills assessment point linked to pay. The NPCC statement, (made at the College of Policing's PDP), that in future officers would only access £10,000 on the new pay scale if they pass the Higher Skills Assessment, creates a requirement that this assessment process must be given the highest level of scrutiny. It simply cannot be introduced unless a full EIA is undertaken; it is proven to achieve the benefits intended; and it is cost-effective. Consultation regarding the intention behind an assessment to access £10,000 must be held at the PCF.
- 1.11.4 Recommendation 4: Regarding the targeted Bonus payments introduced last year, while the Bonus payments should continue for now, there needs to be an opportunity to review: the circumstances under which they are paid; the impact on equal pay; and the guidance around their use, perhaps by incorporating more standard criteria.

- 1.11.5 Recommendation 5: We recommend that a review is undertaken including both the London and SE Allowances, but that in the meantime the discretionary element is removed from the SE Allowances; all SE Allowances are set at the upper limit permissible (currently £3,000); and that both the London and SE Allowances are updated in line with inflation.
- 1.11.6 Recommendation 6: In light of the analysis provided in this submission, particularly at annex 8, where we have calculated fair pay in accordance with the NPCC's own proposed mechanism, we recommend an across the board pay uplift for the next three years. We seek a deal of 5% in year 1, followed by 5% in each of years 2 and 3. This compromise would enable the NPCC to demonstrate a commitment to move towards the overall rectification of the gap between current pay level and just pay levels. Should a three year settlement not be considered possible, then we seek 6.2% this year.
- 1.11.7 Recommendation 7: We believe it is only right that the PRRB should reject completely the NPCC proposal regarding PCDA and DHEP progression pay. We are grateful that in the past the PRRB has been supportive of the PCF. We believe that in this case, the PRRB must remit the consideration of PCDA progression pay back to the PCF. In the meantime, we believe those on the PCDA scheme should progress along the existing Constable pay scale, in the way that all other entrants do. We are unsure why the NPCC has seen fit to hijack this opportunity to insert recommendations for DHEP pay into the PRRB submission. This is not within the remit letter.
- 1.11.8 Recommendation 8: Regarding On Call, in absence of a full review of the allowance usage and amount, as sought by Winsor, the PRRB, and the staff associations, we recommend that officers are paid the same rate as staff members: £29.17 per day. We see no reason for the discrepancy. Further, we believe this should be paid to all ranks.

2 Chapter 2 Pay reform: the NPCC approach to pay

2.1 Principles and design framework

- 2.1.1 The NPCC invited comments on the principles and design framework, and we wrote in response on 23rd October, some three months ago. The letter is attached as annex 1.
- 2.1.2 We believe that many of our comments are not contentious, and are aimed at helping to ensure the process is smooth, so that – if change is to be enacted – it is evidenced and measured, and achieves the intended aims, including the best possible service and value for money for the public. The comments are not reflective of a “hard stance” on behalf of the staff associations, but rather of a willingness to collaborate and ensure that – if a compelling evidence base for change can be provided – then the change is workable and clear for our members.
- 2.1.3 An absolutely fundamental concern is that the principles do not currently (and as written, could not) be used to demonstrate that the NPCC have a “theory of change”³ in mind – based on academic literature and / or practical examples – that demonstrates the logical pathway as to why they believe the specific measures they are taking (the four design blocks) will deliver the outcomes they wish to achieve. This makes any measurement of the benefits, or analysis and tracking of the potential unintended consequences, almost impossible. Certainly at this point we have seen no plan for monitoring the programme in this way, although the NPCC has consistently told us they will create a benefits realisation plan. If the programme is not being monitored to see whether the outcomes are likely to be achievable, and ultimately being achieved, then there is no proper feedback loop

³ Theory of Change is a comprehensive description how and why a desired change is expected to happen in a particular context. It is focused on mapping out what has been described as the “missing middle” between what a programme or change initiative does (its activities or interventions) and how these are expected to lead to desired goals being achieved. This is done by first identifying the desired long-term goals and then working backwards from these to identify all the conditions that must be in place (and how these relate to one another causally) for the outcomes to occur. These are all mapped out in a Benefits Realisation framework. . <https://www.theoryofchange.org/what-is-theory-of-change/> It is a method that has become widely used in situations where the change that is aimed for is not just quantifiable in monetary terms, but rather in social or behavioural impacts.

that would allow the NPCC to make a judgement as to if, or when, elements of the programme should be terminated, and a different course taken. Without measuring outcomes there is no way to undertake a proper cost/benefit analysis. We consider this to be an extremely slapdash and reckless use of public money. We have noted in previous submissions that the development and implementation of the military's New Employment Model provides a study of good practice in this area.⁴ We are not the only voices seeking a better evidence base. In their wide ranging review of diversity in policing Nat Cen found that "Evidence of good practice is limited, partly due to their lack of evaluation".

2.1.4 Below is a synopsis of the comments we supplied in October. While the NPCC has replied, however, it is disappointing that the reply merely suggests that they will look again at the principles in phase 2; and that some of the issues we raised are matters that they themselves were aware of (but without a plan as to how these will be resolved). We have seen no substantial changes made as a result of our comments. We therefore have no alternative but to repeat these all to the PRRB, in hopes that these will be picked up by it, and that the PRRB's leverage is used to influence the NPCC design.

I. The number and structure of principles

2.1.5 There are 14 design principles. This makes the list rather unwieldy and impractical for the sorts of purposes we believe it might be intended (for example, as part of a theory of change, and for specifying likely outcomes; for tracking benefits and unintended consequences; for communicating overall aims and underlying philosophy). We believe it might be shortened, and categorised into objectives (what the NPCC seek to deliver) and supporting design mechanisms / methods (how the NPCC seeks to deliver it), as currently the list is a mixture of both. For example, we see "it will deliver a national pay system" as an objective, while "base

⁴ The New Employment Model was underpinned by an intention to support operational capability. From the early stages, the intended outcomes were set out as being attractiveness, agility, and affordability. Output and outcome measures were determined (including measures of negative impact) and the programme tracked against these. See Qinetiq report 2013, Malcolmson, J, Guest, D, Bourne, M: New Employment Model, Benefits Realisation, and <https://www.gov.uk/guidance/new-employment-model>; and

pay, total cash, and total remuneration will be benchmarked” is a statement of an intention to use a particular method in order to start to deliver the new system (and doesn’t actually set out what the NPCC intend to achieve by using this method).

II. Principles with which we agree

2.1.5.1 There are some principles with which we agree, seeing these as essential and unarguable objectives. These include the principle to “deliver a national pay structure for all officers (at all ranks)”; the principle to “seek to limit bureaucracy but be robust enough to support evidence based decision making”; and the principle that it “should be sustainable into the long term”. Similarly we believe the principle that it should “support the closure of the gender pay gap” to be an unquestionable requirement. However, these principles might more accurately be described as objectives or aspirations: and we agree them to the extent that we agree we should collectively seek to achieve them. Unfortunately, however, even while we agree these, we must raise concerns. It is currently extraordinarily difficult to see how these will be delivered by the current design. There is no map between the principles, the design, and the outcomes. That is, how does the current design support or achieve these principles? In particular, how does it support the closure of the gender gap? We ask the NPCC –

- “Are you able to give any examples of how this design will meet this objective?”
- Do you have data that tests hypotheticals?
- Can you at least state the underlying theory and assumptions that lead from the design to the outcome? (We suggest this might be done in the context of a “Theory of Change” methodology, outlining causal links).”

2.1.6 Regarding the gender pay gap, it is our view that the current design, seeking to potentially limit Constables’ pay to those willing and able to take on specialist roles, would actually have the opposite effect to that stated by the NPCC regarding equality. The Nat Cen report “Enhancing Diversity in Policing” states that “underrepresented groups in the force perceived specialist units as ‘closed shops, only available to individuals who meet the stereotypical profile’”.⁵ Yet the

⁵ Nat Cen report, Enhancing Diversity in Policing, Final Report. Authors Bury, J; Pullerits, M; Edwards, S; Davies, C; and DeMarco, J: dated 16 May 2018 (quotation from page 5).

NPCC have not shown any evidence of taking this into account in their plans for pay reform.

2.1.7 And with regard to gender fairness, there are issues too. For example, there may be an impact on carers' willingness to undertake such roles due to increased need for private study etc. (and more females than males tend to be carers). It may simply be impossible for some females to access roles where the pay is better, for practical reasons. This may lead to an even wider gender pay gap, or to females leaving the service. It is well known that one of the reasons why Equal Pay Audits in policing shown significant gender gaps is that female officers tend to leave service earlier. Nat Cen note in their report that "the police diversity agenda has focused overwhelmingly on recruitment, at the expense of ensuring diversity in relation to retention and progression". "The diversity agenda has resulted in diversifying the workforce in more junior roles in the police and less at senior levels". The report further notes that while female officer retention is impacted negatively because "applications for reduced or flexible hours requested by mothers were seen as unrealistic or implausible".⁶

2.1.8 And yet we have seen no Equality Impact Assessment. The NPCC's own risk register states that "moving from a fixed remuneration framework to a framework with more flexibility could compromise compliance with equal opportunities legislation". The NPCC also acknowledges that "linking pay to skills could also inadvertently increase the gender pay gap". In these statements they themselves are acknowledging that the new framework could actually make the gender pay gap worse. How can they therefore assert that the principle of closing the gender pay gap is being addressed?

III. Principles regarding progression in rank

2.1.9 We note that at the direction of the Treasury the NPCC included the principle that "it will remove increments based solely on length of service". We consider increments paid at the end of each year's service to be rewarding those who are choosing to remain in policing and develop deeper knowledge. We consider time served to be a convenient "dummy" for experience, and a mechanism that

⁶ Nat Cen report, Enhancing Diversity in Policing, Final Report. Authors Bury, J; Pullerits, M; Edwards, S; Davies, C; and DeMarco, J: dated 16 May 2018 (quotations from page 3).

minimises bureaucracy, while offering an incentive. We do not believe there is sufficient evidence to prove there is currently a better or more cost effective way to do this.

- 2.1.10 The NPCC states three further principles related to the consideration of elements of job performance that it believes should be linked to pay, seeking “a link between pay and contribution”, and “competence”, and “specialist skills”. We consider there to be some overlap between these concepts – for example between contribution and competence. We question whether these need all be included, or whether it would be more achievable to consider only one of these at this time, and make the practical arrangements. We note that the PRRB suggested in their report last year that the NPCC should consider reducing their aims and prioritising.
- 2.1.11 Further, even were we to accept the principle of further roll out of competence related pay, we have reservations about its inclusion for practical reasons. We worked consistently with the College of Policing throughout the Assessing and Recognising Competence (ARC) project to try to ensure that the implementation was feasible. That involved having to pare back the original overly ambitious aims that Sir Tom Winsor suggested, of a bespoke testing process, and produce a practical system grounded in policing needs. Even now, with the ARC system based on PDRs, it is the case that the 2018 PEEL report records that only 3 forces were able to demonstrate having conducted performance development reviews (PDRs) for their whole workforce. It is therefore difficult to see how either a link between pay and contribution, or between pay and competence, that is fairly and reliably administered, could be introduced within the timeframes stated for pay reform. The NPCC have acknowledged that the failure of forces to implement PDRs is symptomatic of a risk that “forces do not have the required skills, systems, and capacity to implement and maintain the new framework”. (Risk 12, outlined in Paper 3 provided to PCF September 2018). The risk control action the NPCC suggest - that this be considered when designing the framework, to ensure it is “bureaucratic light”- is a reasonable way to proceed: but the evidence provided in the rest of the paper gives us no faith that that is happening. Specifically, how can the NPCC claim that the design will be “bureaucratic light” while simultaneously trying to fulfil objectives of linking pay to contribution, and competence, and skills?

- 2.1.12 We have recently become aware that the NPCC have stated in College of Policing meetings that the proposed Higher Skills Assessment (to reach “Established Constable” status) will be the only way that Constables can access £10,000 on their pay scale. As a result, the College are rightly designing a process that is as robust as possible. However, the downside is that it will be extremely bureaucratic. We are dismayed at this step, as – in addition to the burden on officers and supervisors that this will impose – there are likely to be significant equality impacts. We cannot support this move without a full Equality Impact Assessment. Moreover, there has been no opportunity to discuss other unintended consequences, such as the impact this is likely to have on officers’ perceptions of what the College hoped would be viewed as a professional development opportunity, rather than a bureaucratic impediment to pay progression. .
- 2.1.13 Below, under Components of the Constable pay scale framework, we set out further evidence taken from a number of our surveys, of the practical difficulties being faced by officers who are having to be assessed within the ARC process.
- 2.1.14 We are concerned that the ambitious set of principles leaves both the NPCC reward team, and the College of Policing, in significant danger of failing to be able to deliver, and to prove the success (or indeed failure) of the work. It is in no-one’s interests in policing for that to be the case.

IV. Principles that create contradictions of purpose

- 2.1.15 There are some principles currently included that we believe could be at odds with one another. For example, “there will be a link between pay and specialist skills” seems contradictory to “it will maintain the flexibility to enable deployment of officers to different roles”. Logically it is difficult to see how these two aspirations can both be addressed. At this stage we do not believe plans are sufficiently developed to demonstrate that both are simultaneously achievable. We look forward to seeing more proof here.

V. Those where we seek much greater detail and explanation of the rationale

- 2.1.16 Finally, there are a number of design principles where it is extremely difficult to see what it is that the NPCC is seeking to do or achieve, as no proposals have yet been brought. These include, firstly, the idea that the framework “will provide flexibility so forces can provide local supplements”. What will these supplements

be for? In what circumstances will they be used? If skills, competence, and so on are already built into progression pay, what else might supplements be considered for? Secondly, these include the idea that “allowances are consolidated where appropriate”. It is difficult to see in what circumstances it might be appropriate to consolidate these. As an example, Away from Home Overnight Allowance incentivises a specific behaviour at a specific time: how would consolidating this continue to meet that end?

2.1.17 Finally, we refer to the list of considerations that we stated in the submissions we made to the PRRB in 2014. We believe this would serve as a suitable basis for design principles: or, at the very least, a useful cross check.

2.1.18 The pay principles remain unchanged despite our feedback. The table attached at annex 2 shows the NPCC response to our comments, and our subsequent feedback.

2.2 Timescales / risk log / assumptions

2.2.1 Similarly we had a number of comments regarding the assumptions and the risk log. Again, the thrust of the NPCC's response is to state that these will be addressed in a later stage of the work/.

I. Assumptions regarding the paybill.

2.2.2 The NPCC state that the framework will seek to be cost-neutral and affordable within forces' budgets. On the other hand, the NPCC state that the design will inform the Comprehensive Spending Review, and that the Home Office model will be used to determine the future impact on the officer pay bill.

2.2.3 Whether we are content with the assumption about funding obviously depends on whether any increase required is actually fed into the CSR, and funding secured, or not. (More detail on this argument is provided in our letter to the NPCC, regarding the risk register, reproduced at annex 1) .

2.2.4 Our faith that the NPCC team will plan accordingly and provide evidence into the CSR has been tested somewhat, by the fact that although the Home Office invited the NPCC and the staff associations to an initial meeting regarding the CSR input in January 2019, the NPCC lead and team declined, stating that they are too busy with the PRRB submission. (We have subsequently been made aware that a meeting did, in fact, go ahead, but that the staff associations were not invited to that. It is disappointing that the Home Office and NPCC did not notify the staff associations).

II. Assumptions regarding transition to the new framework

2.2.5 We sought urgent clarity over a number of matters, including what the NPCC meant by "actual base pay for an individual will not reduce when an officer transitions onto the new framework". We asked what does this mean? By base pay is it meant that officers will not be placed below their current spine point? The NPCC's response is that they will consider this in stage 2. There was no elaboration on their definition of base pay.

2.2.6 We expressed concern regarding the assumption that "existing officers will transition to the new framework over time...phased in line with the capacity of the service to accommodate the changes and operational priorities". We reminded the NPCC that forces do not appear to be ready for these changes (as judged by

PEEL assessments). We asked for thoughts as to how this might be addressed, and the NPCC response is that this will be considered in stage 2.

2.3 Risk register

- 2.3.1 With regard to the risk register, we responded on 23rd October. (See attached annex 1, for the full comments and NPCC responses). We stated that the Risk Control Plan is currently inadequate. Since then, we acknowledge that the NPCC has done some work to try to develop further plans. However, our concern remains that – at this stage, 3 years into a project – the bulk of this work remains to be done.
- 2.3.2 The NPCC team was under resourced at the start of this work, and is now catching up with work that should have been done at the outset. The result is that the team are scrambling now to create a plan at the same time as delivering it. In our view, it would be more appropriate to pare down the work (as suggested by the PRRB) to ensure that whatever is delivered is delivered well.
- 2.3.3 Indeed, risk 15 is stated as “the current programme timeline is unrealistic”. The NPCC note that the PRRB have raised concerns about this. In fact, the PRRB suggested the NPCC prioritise which change is needed. The Risk Control Action suggests the NPCC will do that: “consider focusing on the areas that provide clear identifiable benefits as recommended by the PRRB”.
- 2.3.4 Recommendation: We would go further, and seek that the PRRB insist that the Home Office, NPCC, and staff associations determine which elements of the pay reform should be prioritised, as the NPCC have not actioned this since last year. The scope must be reduced significantly if there is to be any chance of success. As a start point, we ask that the list of principles be reduced to make it manageable and useful. We believe only the set of principles that we have been able to agree should be included at this point: these being to “deliver a national pay structure for all officers at all ranks”; to “seek to limit bureaucracy but be robust enough to support evidence based decision making”; to “support the closure of the gender pay gap”; and to be “sustainable into the long term”.

2.4 Timescales

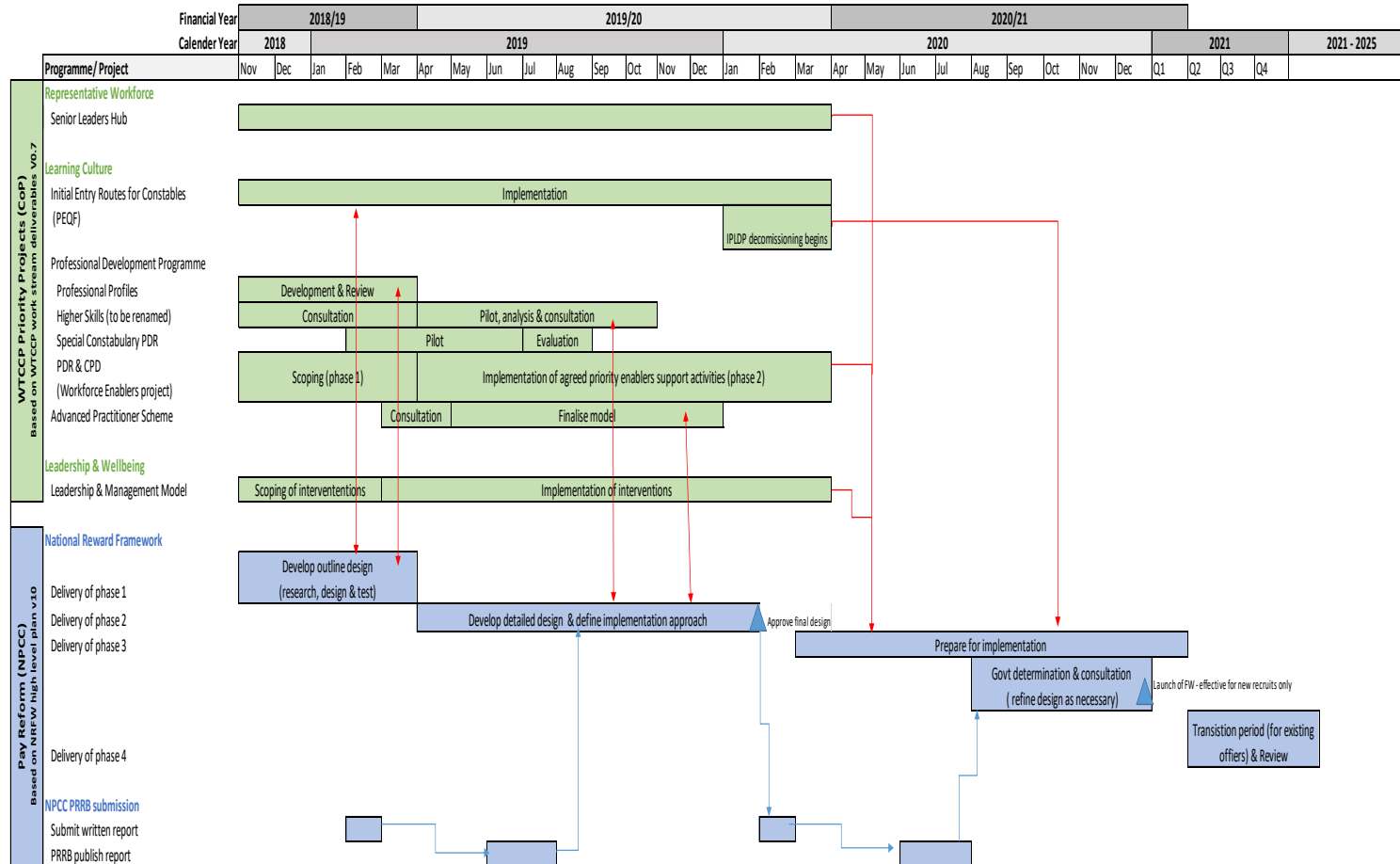
- 2.4.1 Below is the timeline, and the level of detail we were given by the NPCC, when we sought a GANT chart showing project contingencies and dependencies.

- 2.4.2 It is difficult to make detailed comments, when the level of detail is so scant. For example, it is extremely difficult to say that whether the phase 2 work (Develop detailed design and define implementation approach) could indeed be achieved in 10 months, as shown here, because we don't know what specific tasks that involves, nor what outputs from other strands of work it is actually contingent on, other than we know it is the conclusion of some College projects (for which outputs are not defined here).
- 2.4.3 What we can see, is that where the word "consultation" appears the time given is short, and appears to be before the piloting and analysis of schemes. So we must assume this is not showing formal consultation with staff associations, except where it says government consultation, which is scheduled for August to December 2020. Presumably this is when regulatory changes will be consulted upon. We trust the Home Office have been notified, and are able to accommodate this. It seems incredibly tight, given the scale of changes required. This suggests that the consultation will be narrow in focus, as has been the case of late. That is, it is likely to be only about the wording of the regulations / determinations, rather than about the policy intent. We do not believe this is likely to led to an optimum outcome, and seek reassurance that a broader level of consultation will be undertaken.
- 2.4.4 We can also see the launch of the new system for new recruits is due in December 2020. We have been repeatedly assured the system won't be launched until fully ready, and yet elements are being launched already, without Equality Impact Assessments, and without consultation on the proposals. All that the staff associations are being consulted on is the exact wording of regulations. On these, there appears to be no feedback loop to allow any errors or unintended consequences to be fed back into the plan so that it is amended for the future. So, for example, while the PRRB set a new starting salary and initial progression path for PCDA candidates, these still have not been captured in a published determination, as of early February 2019. There will undoubtedly be force errors. And there is a need to track what the impacts are, so that if appropriate, revisions are made. This timescale shows no scope for that.
- 2.4.5 In short then, it is difficult from this level of detail to make well evidenced comments about the timescales. But experience thus far suggests that there have been underestimates of the time that will be required.

Figure 1: NPCC GANT chart. Relationship Workforce Transformation and Reward Framework.

How the delivery of the New National Reward Framework links to the College of Policing Workforce Transformation Co-ordination and Communication Programme

As at December 2018



2.5 Process: Staff Association engagement

I. Informal engagement regarding pay system review

2.5.1 The engagement regarding the pay reforms has taken the following forms, thus far:

- Informal meetings with members of the NPCC team and the staff associations.
- A number of Pay Working Groups, called by the NPCC and attended by HR departments from all forces, and one representative from each of the two staff associations (January – May 2018).
- A series of letters and emails, at points when the NPCC have asked for comments. (Mainly late 2018).
- Of late, the NPCC have brought matters to the PCF.

2.5.2 It is fair to say that the level of commitment in terms of time alone from both “sides” has been significant. However, the issue is whether that time commitment is being well spent, and whether the process feels fair to the staff associations – who, it must be remembered, represent a group of people whose service for the country is unquestioned, who face significant risks and restrictions, and who do not have employment rights.

2.5.3 To date, the view of the staff associations’ National Secretaries is that the NPCC have used all of these mechanisms for the main purpose of communicating to us, rather than to engage in dialogue. The NPCC have not taken on board the views expressed in any meaningful way, as can be seen in responses to staff association concerns. (See annex 2, which provides a table of feedback given following our comments).

2.5.4 Moreover there is a growing concern that, even where the NPCC have sought comments, this has been on matters that – whilst important – are not the key matters with which our members will be concerned. By contrast, staff associations have been unsighted on matters such as the PCDA starting salary and recommended progression salary, and on NPCC recommendations regarding uplifts, until the last possible moment before submission to the PRRB. For that reason, the staff associations feel that they have been treated dismissively and

legitimate concerns have gone unheeded.

2.5.5 Three recent case studies may allow the PRRB a window through which to view the modus operandus of the NPCC:

- Last year, the starting salary for apprentices (PCDAs) of £18,000 was recommended by the NPCC to the PRRB in February 2018 without the staff associations having prior sight of the suggested level, nor any consultation over it. The PRRB accepted the NPCC's starting salary in July 2018. Apprentices started on £18,000 in September: however the Home Office and NPCC still have not published this in a determination. The staff associations have been consulted on the final wording of the determination only, but not on the policy. None of our concerns regarding the impact of this substantial reduction in real terms starting pay have been followed up by the NPCC. For example, there appears to be no updated Equality Impact Assessment, nor any plans to monitor for the unintended consequences such as impact on the calibre of officers attracted to service, recruitment, officer morale, how long these officers stay in service, etc.
- The staff associations have made representations to the NPCC and Home Office regarding the lack of meaningful consultation on PCDA starting salaries. The PRRB clearly sought evidenced proposals from the NPCC regarding the PCDA progression in its report dated July 2018. It is therefore extremely disappointing – and simply cannot be viewed as an oversight – that this year, as of the third week of January (two weeks before the PRRB submissions) the NPCC gave us no sight of a proposal, nor has entered into any discussion regarding what it is it intends to put forward as a recommendation regarding PCDAs' progression. We understand, from a PCF meeting on 24th January, that the NPCC intend to recommend that PCDA progression is at Chief Constable discretion up to a certain pay point. (See Chapter 4 of this submission where we set out our objections).
- Similarly, the NPCC has only mentioned in passing at the end of a meeting (in November) the idea of a three year pay deal, and had not sought to discuss this with us until 24th January 2019, when it was raised without prior warning. (It was not an agenda item). We now

understand that there is an intention to put forward a specific three year deal in the PRRB submission. We are told by the NPCC lead that this has only been a possibility within the last few weeks. In the past, when any proposals were offered the staff associations were given the opportunity to conduct their own analysis of the meaning of the deal for members. That is one reason why the staff associations were ultimately able to support the last multi-year deal (when Jacqui Smith was Home secretary, 2008-2010). This ability has benefited both the staff associations and the employers. We believe it is disgraceful that the NPCC has sought to enfeeble the staff associations in the way that it has.

- 2.5.6 We are unsure what the NPCC seeks to achieve. On the one hand we have been repeatedly told that the NPCC seek positive employee relationships, and to work with the staff associations. On the other, the three examples outlined surely indicate a lack of willingness to allow the staff associations to adequately fulfil their roles, and a lack of respect for their function.

II. The functioning of the PCF, its review, and the need to review more broadly

- 2.5.7 We have expressed concerns for some time now about the working of the PCF. Unfortunately in our view the functioning of the PCF has only declined since we began to raise concerns. At this point, it is not functioning.
- 2.5.8 We are pleased that the PCF is being reviewed. We intend to engage fully in that process. In order to set out our concerns and suggestions for a way forward we wrote to the Home Office on 17 January 2019. That letter is reproduced in full at annex 3. We ask that the PRRB consider that, as it contains case studies, and the rationale for the ten remedies that we are seeking to be enacted.
- 2.5.9 We reflected on what would be needed to improve the functioning of the PCF (by consideration of its Terms of Reference, membership, and so on). We also reflected on the broader consultation structures (the College Regulatory Group and the Police Negotiating Board), as we are not convinced that, even were the PCF to be made functional, that alone would solve the issues.

2.5.10 Our ten recommendations are:

1. It would be helpful if the NPCC lead were able to ensure a deputy with appropriate information and delegations to reach agreement was in attendance, should he be unable to attend in person.
2. The PCF needs, as a bare minimum, a suitable and independent secretariat, able to draft documents for circulation and discussion. This needs to be someone with the appropriate skills and experience, including a background in drafting of proposals, guidance, and circulars.
3. We have used the RaSP review as a case study to evidence the lack of adherence to proper PCF process. The impact was cost to members of the PCF in terms of time and nugatory effort. This was exacerbated by the inclusion of non-members of the forum at meetings, without agreement. In our view, this costly exercise might have been avoided had there been an independent chair, willing to enact an appropriate governance structure.
4. As noted, there is a need for an independent Chair and secretariat. Further, we would like the ToRs amended to ensure this is captured going forward, and for the Police Minister and Home Secretary to be asked to provide Home Office funding. This would provide independent oversight of the work being done, and the process being followed, and would enable timescales to be set and monitored.
5. It would be useful for the ToRs to include agreed timescales and protocols for basic Forum functions, such as the production of minutes, agendas, setting of meeting dates and so on.
6. It would be beneficial for the PCF to have a more formal, statutory footing, again, as is the case with the PABEW. The PABEW is a statutory body and this reflects the importance of the matters being considered by the Board. Pay and conditions matters, either those that can be progressed outside of the annual review body round, as well as any matters that can feed into the PRRB process should have equal status with those at PAB and this could be achieved by either ensuring the PCF is a statutory body, or alternatively by allowing the existing statutory body (PAB) to cover pay and conditions matters. This latter

option would be the more cost effective for all parties, as well as ensuring more joined up working.

7. With regard to membership, representatives from the Home Office have, in recent months, come as a matter of course to all PCF meetings and this has been useful in terms of updating the Forum on consultations on draft determinations; and it also ensures that work can be progressed in the full knowledge of how the Home Office may respond. We believe the Home Office should be members. If the statutory PABEW were to take on consideration of pay and conditions matters then HO attendance would be ensured.
8. The expected levels of delegation and role of all representatives on the Forum and TWGs should be captured. There is a difference between those representatives who are delegated to speak on behalf of the employer body or staff association, those who are present as support staff, and those who are observers only. (We believe this is a national Forum. That is how it was set up, and that shaped the original membership. We are unclear as to why the HR department from one force only has been invited. This seems to undermine the credibility of the national representatives, including the NPCC, who should be empowered and emboldened to speak on behalf of all forces).
9. There is a need for a final resolution process. When consideration is given to reforming the PCF, or looking at alternative ways for pay and conditions matters to be dealt with, PFEW would like to see a route for those matters where agreement can't be reached: a replacement for the arbitration process that was lost. If matters can't be agreed by the PCF (or alternative) then they should be automatically referred to an independent body for consideration. Given that officers have no right to strike, and further limitations on their rights, it seems absolutely unfair and contrary to natural justice that they should have no form of final redress or resolution over matters of pay and conditions.

2.5.11 Even were the PCF to be made to function well, we have considered whether the entire process of formal stakeholder engagement would be properly served, given the existing structures in the broader landscape. We have therefore considered

the relationship to the PRRB, the CoP Regulatory Group, and the PABEW, and PPCF.

2.5.12 The current way in which the consultation process operates, and its governance, is of significant concern to PFEW. Since the abolition of the PNB, and the creation of the PRRB/PCF and the College of Policing Regulatory Forum (CRG, or CCRG), there is no overall governance, and no one 'individual' taking responsibility for identifying the appropriate Forum where matters relating to pay and conditions should be considered. Previously, the Independent Chair of the PNB and the PABEW fulfilled this role, together with the Independent secretariat.

2.5.13 In our letter at annex 3 we set out what the impact of this has been. It is particularly difficult on matters where it is impossible to disentangle the matters that should strictly be dealt with by the College Regulatory Group from those that should be dealt with by the PAB and / or the PCF. The fact that the College is not required to consult on specific aspects does not negate the need for consultation on all other matters relating to terms and conditions that fall within the terms of reference of either the PRRB/PCF and/or the PABEW. This is a concern that we have raised on numerous occasions. For that reason, our final recommendation regarding the engagement and consultation process is:

10. PFEW supports giving consideration to how the whole process should work, from the PRRB recommendation onwards, including consideration of how the PCF (or PABEW) should be involved.

2.6 Components of the framework Constable pay scale

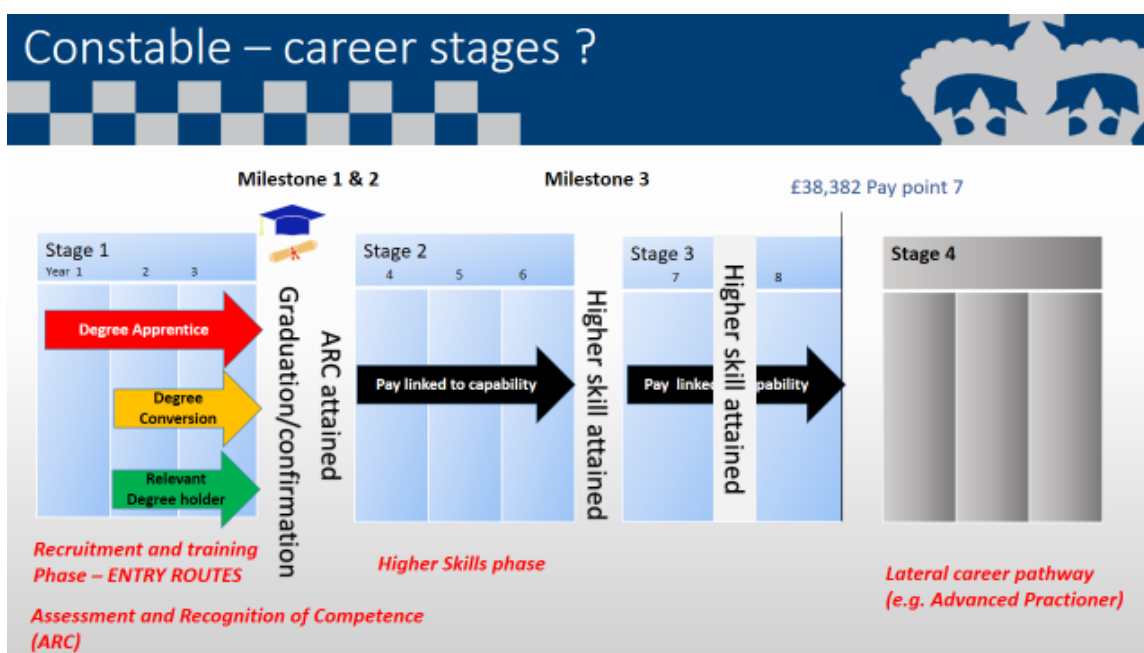
I. Complexity

2.6.1 One of our concerns about the new Constable pay scale is regarding the complexity as compared to the current incremental pay scales. Our understanding is that there will be four "stages".

2.6.2 It would now appear that Stage one will comprise separate pathways for pay progression for each of the three different entry routes. To date we have had no formal explanation of what these will look like. (Please see the section on Apprentice pay, in this submission). We understand that there will also be specialist pay and other forms of variable pay, such that even in the first stage of their careers officers may be on several different pay points. We are concerned

- about the likely impact on fairness, gender equality, and in operational terms on the forces' ability to leverage movement between – or out of – specialisms.
- 2.6.3 We understand that the end of stage one will be the point at which officers attain their degree (for PCDA candidates) and pass ARC (all candidates). We understand this is now to be referred to as Foundation Constable status.
 - 2.6.4 Stage two will consist of the period between ARC and higher skills assessment.
 - 2.6.5 The distinction between stage two and three is currently unclear, as the NPCC plan shows higher skills attained at both the end of stage 2 and the mid-point of stage three. We understand that achievement of the Higher Skills assessment is now to be referred to as Established Constable status.
 - 2.6.6 Stage four is a lateral pathway for Advanced Practitioners, and possibly Leading Constables in the Metropolitan Police Service.
 - 2.6.7 There is significant concern that this system is overly complex, and that it will not be seen as helpful by officers. In our yearly Pay and Morale survey, amongst Federated ranks, the method of determining pay that is most likely to be seen as fair remains incremental pay. More than eight out of ten respondents in PFEW's Pay and Morale survey said that it was fair for pay to be based on officers' length of service.

Figure 2: NPCC diagram of Constable stages.



II. Stage 2 skills assessment: Assessment and Recognition of Competence

- 2.6.8 The ARC system stemmed from one of the recommendations of Tom Winsor's Independent Review of Police Officer and Staff Remuneration and Conditions in 2011.⁷ It took a six year period up to January 2017 to design and implement. Ultimately, despite College of Policing and Home Office ambitions to create a number of separate measures, the key method for assessment comes down to the existing Performance and Development Review. The reasons why it was not possible to be more inventive are many.
- 2.6.9 The ARC assessment determines whether an officer can progress to pay point 4, currently a salary of £26,802. It is the first implementation of competence based assessment across policing.
- 2.6.10 We do not have firm costs for the implementation of ARC. However, a very conservative estimate of the cost of design, in terms of College staff time and the costs to a number of largely public funded stakeholders who attended and provided input to project board and review meetings over a period of more than four years could be estimated as at least between £500,000 and £1,000,000. This does not take into account the costs to forces of training supervisors, and then taking the time to complete the assessments.

⁷ Independent Review of Police Officer and Staff Remuneration and Conditions, Final report Volumes 1 and 2 published 2012. Author Tom Winsor, commissioned by the Home Secretary in October 2010. .

- 2.6.11 As for ongoing running costs, the 2017/18 Police Workforce Census as of 7th September 2018 indicates there were 2,201 full time officers in England and Wales on Pay Point 3 of the new Constables' pay scale who we would expect to complete the ARC assessment in order to go up to Pay Point 4 in the 12 month period between September 2018 and September 2019. (There will be part-time officers too, but we don't have data on these from the Census). If we assume that each officer assessed spent 4 hours preparing materials for assessment, and 2 hours being assessed, and each assessor spent 3 hours on the entire process per officer, then the costs in time alone are likely to be around £340,000 – a third of a million pounds - per year. Put another way, that's about 20,000 hours each year lost from the opportunity to deliver frontline policing. Should officers appeal, then clearly costs will be much higher. By contrast, the "savings" will be in the order of £1,100 from the paybill for each officer who fails the assessment. To date, an extremely small number have failed.
- 2.6.12 Officer perceptions demonstrate further problems, and potential barriers to implementation. The NPCC claim that one of the principles for pay reform that it should be light on bureaucracy. But our research suggests that ARC implementation is anything but. We surveyed officers who have completed the ARC assessment in the last 12 months. Of these, 46% said that they were dissatisfied with the time taken to complete the ARC assessment (compared with 24% of respondents who said that they were satisfied).
- 2.6.13 62% of respondents said that they were dissatisfied with the amount of guidance and support they received regarding the ARC assessment (compared with 14% of respondents who said that they were satisfied). The proportion of respondents who said that they were dissatisfied with the amount of guidance and support they received has actually increased since the ARC assessment was first introduced (50% of respondents in last year's survey said that they were dissatisfied with the guidance they received).
- 2.6.14 Respondents were also asked how they would rate the overall fairness of the ARC process. 42% of respondents said that they felt the ARC process was unfair, compared to 20% who felt that it was fair.
- 2.6.15 Bearing in mind the evidence is that the ARC process is costly for limited benefit, and is considered time consuming and unfair by officers, it seems worth questioning whether it is sensible to develop a further assessment for Higher Skills

at this point.

2.6.16 Finally, we are concerned that the ARC process may have negative impacts on gender pay, and BME candidates. The evidence from Equal Pay Audits⁸ is unequivocal: where there is discretion over pay, there is adverse impact. Nat Cen undertook a robust research project into the factors that impact on diversity in policing. Their recommendation at the end of this review was that the service should “reduce supervisory discretion around deployment and promotion to avoid the possibility of unconscious bias in decision making”.⁹ And yet the NPCC is seeking to do the opposite, and introduce discretion with regard to progression, where discretion did not previously exist.

2.6.17 Recommendation 3: We recommend that, in the interests of openness and transparency, and achieving appropriate expenditure from the public purse, a full cost benefit analysis of the existing ARC process is undertaken. An Equality Impact Assessment must now be conducted, as the programme has been running nearly two years. Only if it can be proved to be worth the outlay in terms of cost and time, and that it is fair, should the NPCC proceed with plans for a Higher Skills assessment point linked to pay. We suggest that if the costs / benefit cannot be shown, then the money that would otherwise have gone on the design and delivery of Higher Skills assessment could be taken as a cost saving.

⁸ PFEW Research and Policy report R111/2017 Author: Dr D Van Mechelen. Equal Pay Audit 2016, and Trends 2009-2016.

⁹ Nat Cen report, Enhancing Diversity in Policing, Final Report. Authors Bury, J; Pullerits, M; Edwards, S; Davies, C; and DeMarco, J: dated 16 May 2018 (quotation from page 7).

III. Higher Skills Assessment

- 2.6.18 We have had no discussions as yet regarding pay for the Higher Skills Assessment, at PCF, nor have we had any informal discussions during our many engagement meetings with the NPCC.
- 2.6.19 We have, however, become aware that at the College of Policing Professional Development programme Board the NPCC has stated that the Higher Skills Assessment will be the mechanism that Constables will have to pass through in order to access £10,000. That is, pay will be restricted by this amount, unless officers pass this assessment.
- 2.6.20 We are extremely disappointed that the NPCC have chosen to discuss this, first, in an arena where pay is explicitly not within the meeting's jurisdiction.
- 2.6.21 With regard to the amount, £10,000, we feel that this is disproportionate to the assessment, and likely to cause a number of unintended consequences, including undue stress on officers and assessors, significant bureaucracy, and a need for officers to spend time recording proof of meeting the assessment criteria, that they could otherwise spend delivering a service to the public.
- 2.6.22 This is contrary to the NPCC's expressed intention, in other discussions regarding the pay scale. Like the staff associations, the NPCC has previously stated that a smoothing of the pay scale, without huge leaps, would be better. We seek urgent clarification over this matter, and why the NPCC have changed their policy so radically.
- 2.6.23 We believe that no staff association would be willing to support such a significant amount of money being dependent on an assessment process without first seeing the process in operation, and without a robust equality Impact assessment being undertaken.
- 2.6.24 Unfortunately another unintended consequence is likely to be in terms of how officers perceive the assessment and the College. Instead of viewing this as a positive opportunity to demonstrate continuing professional development, the size and importance of the restriction to pay is likely to mean officers view it as a stick with which they are being beaten. If this is enacted the NPCC will have passed a significant risk on to the College of Policing, which appears counter-productive.

IV. Advanced Practitioner

- 2.6.25 The College of Policing conducted a pilot of the Advanced Practitioner scheme between March 2017 and August 2018. The scheme has a high drop-out rate, with 16 out of 53 respondents to their evaluation survey leaving within a year, and a further 11 never getting started on the scheme. Only 46% completed it. The main reasons for leaving the scheme appeared to be a need for more support from managers and needing more time to perform the role. These were also some of the main challenges within the Advanced Practitioner role that participants identified.
- 2.6.26 Whilst there was some evidence from the pilot that the AP role increased job satisfaction and motivation (e.g. 19 out of the 25 APs who were in post for more than a year agreed that the scheme had increased their motivation and satisfaction), impacts on perceived recognition for their work were less clear (only 8 out of 25 felt they received more recognition through participating in the AP scheme). Moreover, these figures do not take into account the high drop-out rate within the pilot, thus the impact on satisfaction and motivation may be more limited than the top-line figure suggest.
- 2.6.27 The College says it recognises that the evaluation was not intended to test the impact of the AP scheme, because the pilot allowed forces to introduce the role in different ways. This highlights the challenge of achieving consistency and comparability in what is expected of incumbents (and consequently assessment and remuneration of the role) even amongst just seven pilot forces, let alone if the scheme were to be rolled out nationwide.

2.6.28 Our key concerns regarding this initiative remain, as we stated at the outset.

These are: there are significant issues regarding consistency across forces, which is likely to create unfairness and difficult in transferring between forces; we remain unconvinced regarding how the need (if any) will be identified, and in particular how this will play out in terms of the equality impact; we are concerned lest the scheme discourages people from the promotion route, and we have not had an explanation as to how the pay scheme can be made to make both routes attractive, while ensuring a meaningful uplift for taking on increased responsibilities.

2.7 Benchmarking

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

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

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

a) The selection of a comparator group.

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

2.7.4 The selection of a comparator group is difficult. The unique nature of policing means that no single job is completely comparable. The alternative is to simply use all jobs; or to choose a group of jobs, such as the whole public sector; or to use jobs with similar requirement qualifications.

2.7.5 Regarding which part of an officer's pay should be used in benchmarking, we agree with the NPCC that – if the P factor is properly defined and quantified – then it will be useful to use it as a way to recompense officers for the unique aspects of policing. It should therefore be added to the level set for officers' salaries *after* benchmarking. That is, salary should be set that is equivalent to an appropriate median, and then the P factor component should be added.

I. The selection of a comparator group, for starting and early years' progression

2.7.6 It is worth setting out a few possible comparator groups. Firstly, we believe that if most officers are expected to be degree holders on entry to the service, then it is important to look at the likely remuneration of graduates.

2.7.7 XpertHR undertook a graduate recruitment and starting salaries survey this year. It covers 186 employers employing 387,269 staff.¹⁰

2.7.8 Annual starting salaries reported in the 2018 survey by all employers were as follows (2017 in brackets):

| | |
|----------------|--|
| Lower quartile | £21,000 (£20,000) |
| Median | £24,000 (£24,000) |
| Upper quartile | £27,000 (£26,000) |
| Mean average | £24,647 (£23,990) Based on 169 responses |

2.7.9 In fact, this varies by organisation size, with smaller organisations paying less: median £23,000 1-249 employees; £25,000 (250-999 employees; and £25,500 (1,000+ employees) (N=163). So accepting that there are over 121,000 officers, the appropriate median could be assumed to be £25,500 as a starting salary.

2.7.10 As a cross check, we referred back to work done for us by IDR in 2017. It suggested that graduate starting salaries are even higher:

| | |
|----------------|-------------------------------|
| Lower quartile | £26,000 |
| Median | £27,000 |
| Upper quartile | £29,000 Based on 47 responses |

2.7.11 The public sector is also a useful place to look for comparators.

¹⁰ XPERTHR Graduate recruitment and starting salaries survey 2018; Author: Michael Carty

<https://www.xperthr.co.uk/survey-analysis/graduate-recruitment-and-starting-salaries-survey-2018/163495/?keywords=graduate+recruitment+and+startingsalaries>

- 2.7.12 Nurses need a degree, and to be registered with the Nursing and Midwifery Council (NMC) before NHS employment. Starting salary is on the lowest point of Agenda for Change (AfC) Band 5 18/19 starting at £23,023. The eight point scale rises to £29,068, but on accessing Band 6 nurses' pay can go up another nine point scale to £36,644.
- 2.7.13 Paramedics need to complete a paramedic qualification (most commonly a foundation degree), be registered with the Health and Care Profession Council (HCPC) and employed at an ambulance service. They start on a Newly Qualified Paramedic (NQP) programme for a maximum of 2 years. As for nurses, the AfC band 5, £23,023. At the end of 2 years they move to the minimum of AfC Band 6 £28,050.
- 2.7.14 For a Newly Qualified Social Worker the median starting salary is £28,925, with an interquartile range of £27,924 to £29,558 (based on IDR's database).
- 2.7.15 Schoolteachers start on £23,730.
- 2.7.16 In conclusion, these data suggest that, now that most entrants to policing will be degree qualified on entry, the starting salary of between £20,370 and £23,586 is considerably lower than reasonable comparators. Note that we agree the NPCC position that the salary should be compared, and then the P factor added. Given that the police starting salary used here already incorporates the P factor, the subtraction of the P factor will therefore demonstrate even further that starting salaries are not fair, and are unlikely to remain competitive.
- 2.7.17 It's also worth briefly considering pay progression for graduates. IDR provided us with the graduate progression figures from their 2017 database. This suggests that the graduate starting salary median was £27,500, rising to £35,000 after 3 years, and £40,000 after 5 years. Even at the lower quartile the salary after 5 years was £35,500.¹¹
- 2.7.18 For nurses, pay after 3 years is £24,915, and after 5 is £26,963. For paramedics it is £29,177 after 3 years, and £30,070 after 5.
- 2.7.19 After 3 years Constables are likely to be on spine point 3, £25,728; and after 5, on

¹¹ Based on 17 organisations in the IDR survey able to provide both current graduate data and also figures for those recruited 3 years and 5 years earlier (in 2014 and 2012 respectively).

spine point 5, £28,947. Again, it must be concluded that Constables are paid lower than many reasonable comparators, such as paramedics, and certainly much lower than graduates in the wider working population, as evidenced by the IDR data.

2.7.20 In terms of other appropriate comparisons, we believe there is merit in looking at ASHE data on professional and associate professional and technical occupations (APTs). We believe the PRRB have also used these data.

2.7.21 The overall median for all professional occupations is currently £38,544, but the mean is £44,127, due to the influence of outliers at the top of the distribution. The median for paramedics is £38,880; for teachers is £38,473, and for solicitors is £43,725. (Solicitors are included as a broad comparator here as it is expected that officers' degrees will require sound knowledge of the law). However, clearly the median includes people with a range of levels of experience.

2.7.22 The top of the teacher scale (U3) for a teacher without a leadership role is £39,406.

2.7.23 We have seen advice to the NPCC from KFH that there is possibly no one single comparator, and that a number of comparators should be pulled together. We agree that this is complex. Given the remit of the PCF to try to agree data for PRRB input purposes, we believe it is essential that the employers and staff associations agree the benchmark data to be used in pay calculations. We appeal to the NPCC to include this as a contingency within their programme plan. In the meantime we have chosen benchmark figures for our calculation of fair pay, for illustrative purposes.

2.8 The P factor: The choice of the proportion of pay to be benchmarked, and value of the P factor

2.8.1 The P factor is the element of pay reform where there is most agreement with the NPCC, as we are content with both the content, and the method by which the NPCC have said they will incorporate the P factor into pay for federated ranks.

2.8.2 The PFEW has conducted research into the psychological contract within policing, working with King's College London. We have used that work to feed into the NPCC's P factor definitions, where we identified a small number of gaps. (See annex 4 for a synopsis of that research).

- 2.8.3 We believe that the calculation of pay should reflect procedural justice. Therefore we support the NPCC's stated intention, that the component of pay known as the P factor should be separated out from pay for benchmarking purposes. The balance of pay should be used for market comparison, as this is the part that compensates for the skills and abilities that officers require that may not be unique to the role. Given that officers are already on a certain level of pay, we believe the sequence should be to first determine the size of the P factor; then subtract that from current pay, and compare the value that is left to appropriate comparators.
- 2.8.4 Indeed, that is the substance of NPCC work, of which we had sight in early 2018.
- 2.8.5 Where we differ from the NPCC is in our view of how big the P factor should be.
- 2.8.6 Our view is that the P factor must therefore be properly calculated, based on the significant risks and restrictions to officers. We believe that such work will reveal that it should be valued at similar level to that of the Armed Forces – ie around 14%.
- 2.8.7 In our section on a fair pay uplift, (Chapter 3 (3.4)), we have used the methodology as described by the NPCC. We have input appropriate benchmark comparator figures, and have calculated the target value for pay based on a P factor of both 14% (the level we believe is appropriate) and the NPCC's latest value, which is 10%.¹²

II. Variable Pay

- 2.8.8 We understand that the NPCC wish to examine what it terms "variable pay". Throughout the course of the pay reform work opinions seem to have varied about the degree to which variable pay needs reform. However, in the last few months we have been supplied with a diagram that categories variable pay into 4 components.

¹² Paper to Chief Constables' Council on Pay Reform, dated 16th January 2019. Author CC Francis Habgood.

- 2.8.9 This broadly speaking seems to reflect the current reward system. All of the examples given reflect payments that have been negotiated over some considerable period of time, and all that is new is the categorisation.
- 2.8.10 We are unclear at this point what it is that the NPCC is proposing to do with several of these allowances, although we note that there appears to be a will to create more discretionary and fewer mandated allowances. This is of significant concern to us, due to equality considerations.
- 2.8.11 Our Pay and Morale survey findings highlight that officers also have concerns about locally-determined pay. More than half (52%) felt that it was unfair for pay to be at the discretion of the Chief Constable of each force, rather than being nationally determined, compared to just 17% who said that it was fair for pay to be determined locally. The perceived unfairness of locally-determined pay suggests challenges for implementation.

Figure 3 Variable pay NPCC categorisation

| | |
|---|--|
| <p><u>Role based allowance</u> <i>This payment would recognise areas that are relevant to the role, for example core skills, environment, demanding nature. This might be used to address 'hard to fill' roles. Current examples of such payments include:</i></p> <ul style="list-style-type: none"> • Dog handlers • Surveillance officers • Neighbourhood supervisor • Firearms officers • Detectives | <p><u>Outstanding, demanding or unpleasant piece of work</u> <i>This payment would mirror the existing bonus payment under Regulation 34 Annex U. It could be paid for an individual or a team (of any size). Examples of this include:</i></p> <ul style="list-style-type: none"> • Family Liaison Officers (if paid per deployment rather than as a skill) • Important or outstanding piece of work • Significant contribution • Unpleasant task (e.g. fingerprinting of decomposing body) |
| <p><u>Skill additional to role</u> <i>This payment would be used to recognise additional skills over and above core skills or where there is a requirement to recognise mission critical skills. Examples of this include:</i></p> <ul style="list-style-type: none"> • Hostage negotiation • Public Order (where additional to role) • Tutor Constable | <p><u>Geographic allowance</u> <i>This payment would be used to compensate officers where geography has a financial or other non-financial, but significant, impact on the individual. Current examples include:</i></p> <ul style="list-style-type: none"> • Allowance to compensate for cost of living (South East / London) • Overseas aid deployment • Organisational posting (in lieu of house move) |

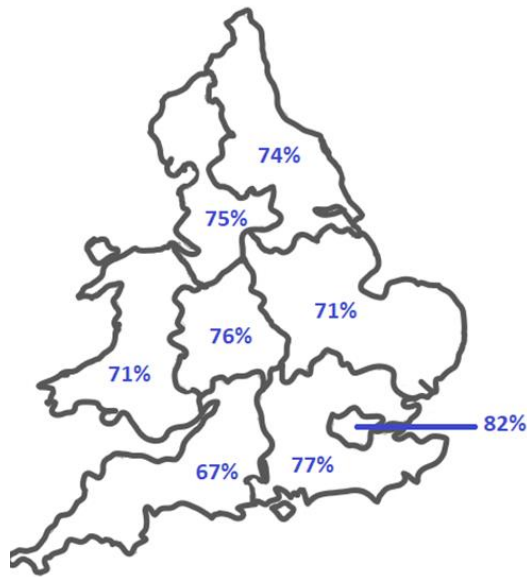
Mandatory / discretionary



2.8.12 Some findings from our Pay and Morale survey can provide context, given the NPCC's categorisation of pay into role, regional, and skill based, and pay for work that is particularly demanding or unpleasant.

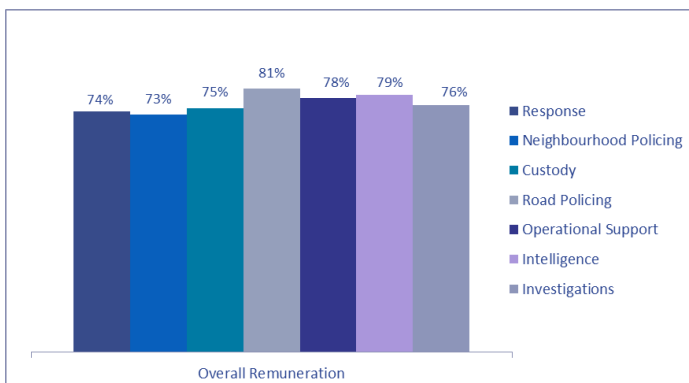
- Regional pay: The NPCC's proposals include targeting pay at particular roles and regions. The Pay and Morale survey highlights that dissatisfaction with pay and allowances is ubiquitous across all roles and regions, rather than being limited to specific areas. For instance, although respondents in London and the South East were slightly more likely to be dissatisfied with their overall remuneration than respondents in other regions, at least three quarters of respondents in the West Midlands and the North West were also dissatisfied; these respondents are unlikely to receive any further remuneration from a regional allowance.

Figure 4 Proportion of officers dissatisfied with pay and allowances, by region 2018



2.8.13 Role based pay: Moreover, whilst 76% of respondents in an Investigations role (detectives) were dissatisfied with their overall remuneration, at least 73% of respondents across all roles were dissatisfied. Indeed, respondents in a Roads Policing role, again not currently mentioned within the NPCC's framework as being a hard to fill role, were the most likely to report dissatisfaction with their overall remuneration.

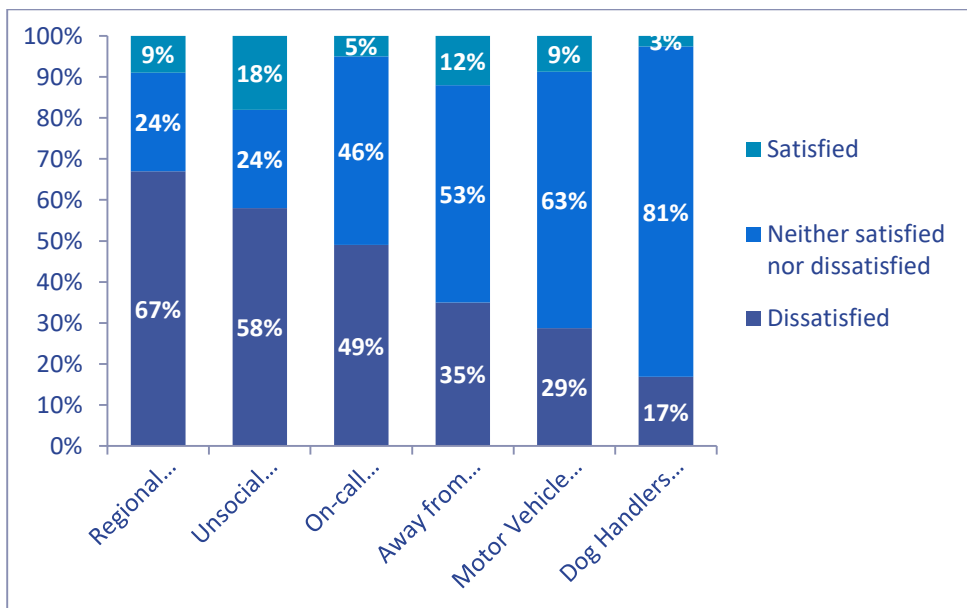
Figure 5: Proportion of officers dissatisfied with pay and allowances, by role 2018



2.8.14 What these findings perhaps best illustrate are the potential unintended consequences of variable pay. Targeting particular groups may be seen as effective levers in terms of recruitment and retention, however given the widespread levels of remuneration dissatisfaction this may be perceived negatively by anyone not in receipt of enhanced payment.

2.8.15 Regarding existing allowances, respondents in receipt of specific allowances were asked about their satisfaction with the amount of particular allowances. Two thirds of respondents in receipt of a Regional Allowance (London or South East Allowance) said that they were dissatisfied with the amount of that allowance. In addition, 58% were dissatisfied with the amount of Unsocial Hours payment, and just under half (49%) were dissatisfied with the amount of On-Call allowance. In comparison, only 17% of respondents were dissatisfied with the amount of their Dog Handlers' Allowance.

Figure 6: Proportion of officers satisfied / dissatisfied with certain allowances



2.8.16 In the absence of any other information about, or discussion of, which elements of Variable pay the NPCC wish to bring to the PRRB this year, we must provide comments based on the paper to Chiefs' Council dated 16th January 2018. We understand that the NPCC intend to make two recommendations: one relating to the new targeted Bonus payments, and one relating to London and SE Allowances.

Targeted Bonus Payments

2.8.17 These were introduced last year. The staff associations agreed these at PCF, as had we not done so, then we were concerned that officers would lose pay. Nonetheless we expressed significant concerns about the proposals. Chief amongst these was that discretionary pay is often the cause of unfairness in pay.

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

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

2.8.20 Finally, we have expressed our concerns about the data gathering undertaken by the NPCC. We are not convinced that the respondents are necessarily informed about the key issues that we believe must be taken into account. And when we have been shown survey results, there have been a number of obvious errors in terms of data accuracy. These have not been addressed, and there is a significant verification issue.

2.8.21 We therefore recommend that, while the Bonus payments should continue for now, there needs to be an opportunity to review: the circumstances under which they are paid; the impact on equal pay; and the guidance around their use, perhaps by incorporating more standard criteria.

London and SE Allowances

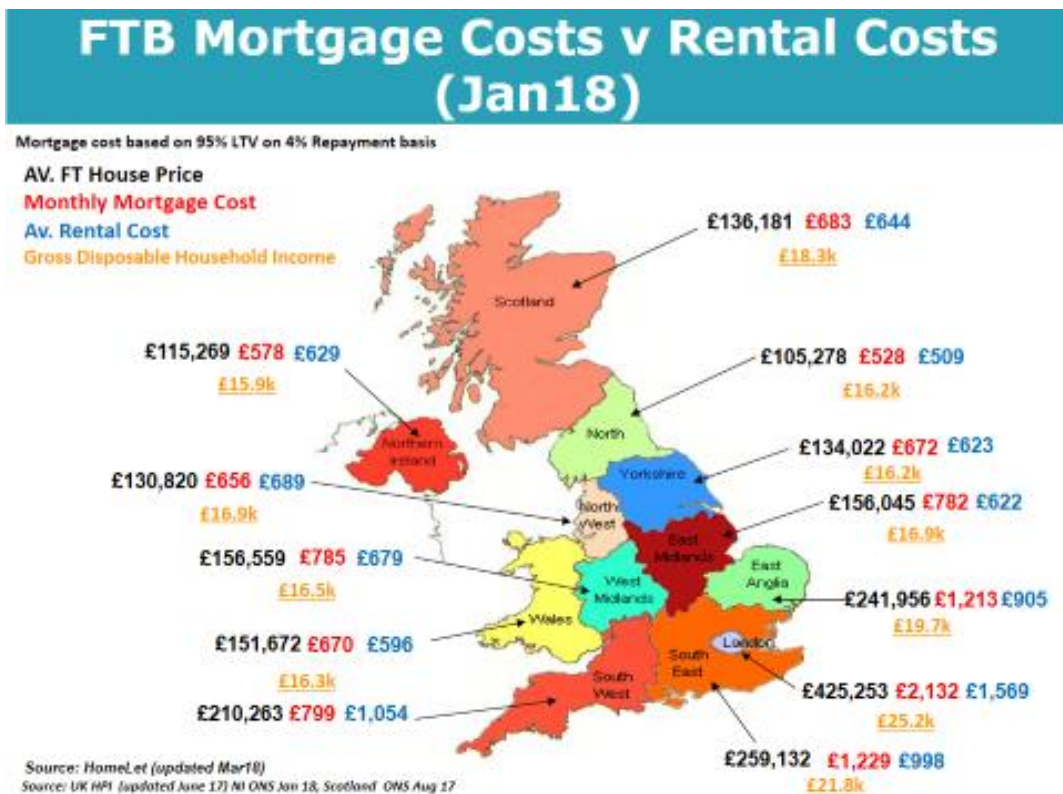
2.8.22 We believe that the London and SE Allowances need to be considered together, as there is a danger that if they are out of kilter then officers will be poached between forces. The NPCC recognises this.

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

2.8.24 Our position is that all forces around London should be paid the same, mandated, and not discretionary. The current forces included, Essex, Hertfordshire, Kent, Surrey, Sussex, Thames Valley, Hampshire, and Bedfordshire are able to pay up to a maximum of £3,000: yet some pay only £1,000. (It is our understanding that Bedfordshire Police, and Hampshire pay as little as £1000; while Sussex, Essex, Hertfordshire, Kent, and TVP pay around £2,000; and Surrey pays £2,500-£3,000).

2.8.25 The data below, supplied by Police Mutual, demonstrates the difficulty for these forces. The key monthly outgoings of officers in these areas, mortgage or rent, is substantially higher than in any other area. This must be recognised.

Figure 7: Police Mutual data: FTB mortgage and rental costs by region



2.8.27 We understand the NPCC intends to recommend that there is “further work to update the London and South East allowances in terms of both structure and value. The basic format to remain unchanged for 2019/2020”.

2.8.28 We understood that such work would be conducted following last year’s submission, and are disappointed that progress does not appear to have been made.

2.8.29 We understand that the MPS are keen to offer an uplift on the London Allowances and weighting. We would not wish to usurp any offer that assists our members: however we are unclear what offer might be made, and whether it would be supported by the NPCC. In absence of that information, we recommend that a review is undertaken including both the London and SE Allowances, but that in the meantime the discretionary element is removed from the SE Allowances; all SE Allowances are set at the upper limit permissible (currently £3,000); and that both the London and SE Allowances are updated in line with inflation.

3 Chapter 3 Calculating a fair level of pay: the uplift case

3.1.1 In the following chapter we make a case for the level of pay uplift. The chapter is split into three sections:

1. The economic context, and how past pay suppression of pay has impacted on officers.
2. The calculation of a level of pay that we believe offers procedural justice, and is based on the NPCC's espoused methodology of benchmarking, followed by the addition of the P factor.
3. Consideration of affordability.

3.2 Context: economic information, and impacts on officers

I. Economic context: past and future trends

3.2.1 Public sector pay restraint has applied to the police since 2010, including a 2-year incremental progression freeze from 2012. This has meant the real terms pay of police officers has continued to fall. The 2% award from September 2018 was below the September inflation rate of 3.3% for RPI and 2.4% for CPI. Moreover, the removal of the 1% unconsolidated increase from the year before meant that officers would only have seen money in their pockets equivalent to a 0.85% uplift (given that unlike the previous year the entire uplift is subject to pension contributions).

3.2.2 We insist that the 2019/20 pay award needs to be viewed in the context of the Chancellor of the Exchequer's recent Autumn Budget speech in which he declared that "austerity is coming to an end". Police officers have not seen real wage growth since 2010.

3.2.3 The most recent average weekly earnings reported by the Office for National Statistics (ONS) shows regular pay rising gradually over the last year. In the 3 months to October 2018 regular pay in the whole economy increased by 3.3% compared to a rise of only 2.3% last year.¹³ Private sector wage growth continues

¹³ ONS, *UK labour market: December 2018*, 11 December 2018, p16 link to supplementary table EARN01. Available from ONS website,

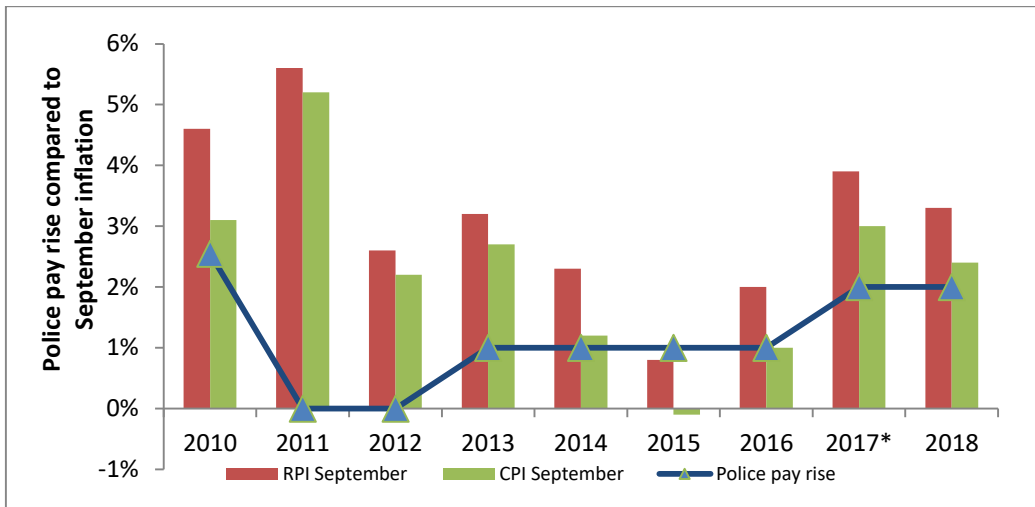
to increase at a faster rate than public sector growth.

- 3.2.4 Last year the review body recommended that the 1% non-consolidated element of the 2017/18 award to federated and superintending ranks “should now be consolidated, before addressing the uplift required for the main pay award of 2018/19”. We were therefore disappointed that the Government ignored this independent recommendation and chose not to consolidate this payment onto all pay points for officers at these ranks.¹⁴ That decision is the subject of judicial review.
- 3.2.5 In fact, by our calculations, the removal of the unconsolidated element of the previous year’s uplift, 1%, followed by a 2% uplift, meant that the impact in terms of take-home pay was lower than might be expected with a 2% uplift under normal circumstances. That is, officers now have to pay pension contributions of up to 15% on the whole of the uplift, including on the equivalent 1% on which no contributions were paid in the previous year. Officers therefore would have seen an increase in actual take-home pay commensurate with a 0.85% uplift on the previous year.
- 3.2.6 As in previous years we have used the Census figures for nominal average pay (basic and total) in each financial year from 2009-10 to 2017-18 for full-time officers in each rank,¹⁵ and then calculated the nominal percentage increase from one year to the next and set this against RPI inflation for each year, and cumulatively across the period.¹⁶

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/december2018#average-weekly-earnings>

- ¹⁴ Home Office announcement of police pay increase in 2018 to 2019, 24 July 2018
<https://www.gov.uk/government/news/police-to-receive-2-pay-increase-in-2018-19>
- ¹⁵ Total pay now includes the following allowance payments: London Weighting, location, overtime, replacement, unsocial hours, overnight, hardship, on-call, other additional allowances, and in the past federated ranks’ CRTP and SPP, and superintending ranks’ bonus payments. Since the 2010 base data excluded ‘other additional allowances’ (dog handler payments, secondment payments etc.) due to the incorrect inclusion of expenses the total pay figures for 2011 to 2017, which included such payments, was adjusted accordingly.
- ¹⁶ RPI inflation average for each financial year calculated from monthly figures in complete *Consumer Price Inflation Reference Tables*, November 2017 (Table 37 RPI All Items 12 months % change: 1948 to 2017) on ONS website at
<https://www.ons.gov.uk/economy/inflationandpriceindices/datasets/consumerpriceinflation>

Figure 8: Police officer pay settlements compared to RPI and CPI inflation, 2010-2018



* Although this is recorded as a 2% award, 1% of it was non-consolidated.

3.2.7 Over this period the recent changes in pay and inflation have together reduced the real terms value of full-time Constables' average basic pay by approximately 15% (from £31,601 in 2009-10 to £26,956 in 2017-18). Constables' total pay also reduced overall by about 17% (from £38,125 to £31,692).¹⁷ The real terms pay of Sergeants fell by about 15% (basic) and 19% (total). There were also continuing falls in the real pay of Inspectors (about 16% basic and about 20% total) and Chief Inspectors (about 16% basic and 21% total). Over the period as a whole Superintendents' pay has fallen in real-terms by around 15% in basic and 19% in total pay. For Chief Superintendents, there has been a fall of just under 13% in basic and 19% in total pay. (Graphs showing this, and further explanation of the economic context, are included at annex 7).

¹⁷ In respect of the total pay calculation this year it should be noted that the Home Office reported the MPS as having "considerable difficulties extracting pay information due to a change in system", which "may have led to different allowances being included in the 'other additional allowances' category this year compared to last year". Since 'other allowances' need to be discounted in our calculation of total pay (see explanation in previous footnote) it is possible that this may have a slight impact on the figures reported.

3.2.8 In summary, over the period from 2010 to now, there has been a real terms gap in the value of police pay settlements (compared to RPI) of about 18%. (Cumulative pay settlements for the police have totalled 10.55%, whereas cumulative RPI has been 28.3%). As a result the real terms average total pay of police officers continues to fall by about 18% for all federated ranks and 19% for superintending ranks.

3.2.9 To recruit and retain officers with the requisite skills it is imperative to start making up this reduction in pay now that austerity is ending.

3.3 Impacts on officers: National research evidence from the Through Career Research, Pay Survey, and Police Mutual data

3.3.1 We have sought to measure whether the pay restraint of the last several years has had an impact of officers in terms of their ability to manage their finances, their attitudes to pay, and their attitudes to service, and in particular whether they believe pay is fair and whether it is in keeping with their expectations.

I. Pay and Morale Survey 2018¹⁸:Cost of living

3.3.2 The PFEW Pay and Morale Survey is a national survey, and obtains federated rank members' views on their current pay and conditions, as well as their attitudes to their work and the police service in general. The Pay and Morale survey is an annual survey, which has been conducted each year since 2014. This year the survey was completed by 27,054 PFEW members, representing a response rate of approximately 22% of all federated rank officers in England and Wales¹⁹. We have published from this survey in several peer reviewed journals and conferences, such that it can be seen to be academically robust and credible. We also publish a number of reports, which are available on our website and Hub.

¹⁸ PFEW Research Report The Pay and Morale Survey 2018, R047/2018, author Dr F Boag-Munroe

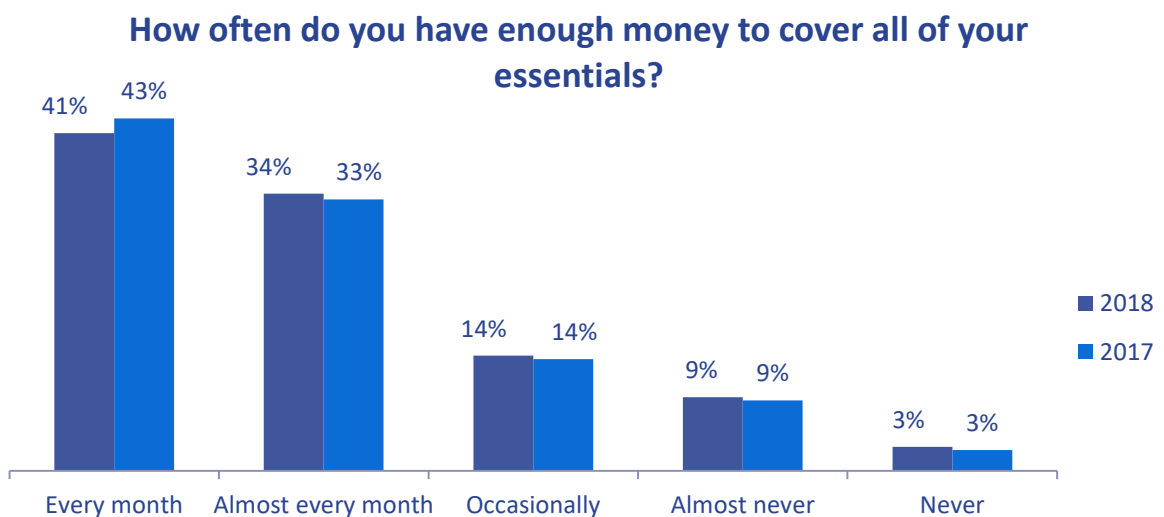
¹⁹ Statistically, the sample size was large enough that the percentages quoted in this report can be considered to be accurate within the normal bounds of academic rigour (margin of error of $\pm 1\%$ with a 99% confidence level)

3.3.3 Only 41% of respondents said that they had enough money to cover all of their essentials every month, and more than one in nine (12%) said that they either never or almost never had enough money to cover all of their essentials. This proportion is identical to 2017.

3.3.4 This year’s survey also asked respondents about how concerned they were about their personal finances. 45% of respondents said that they worried about the state of their personal finances either every day or almost every day, compared to 47% who said that they worried occasionally and 9% who said that they either never or almost never worried about the state of their personal finances.

3.3.5 The proportion of respondents who said that they had taken out a “pay day” loan was relatively small, with 4% of respondents saying that they had taken out a pay day loan at least once in the last year. However around one in seven respondents (15%) said that they had sought advice because of money issues in the last year. These figures raise concerns about the financial vulnerability of many members of the federated ranks.

Figure 9: Proportion of officers stating they have enough money to cover essentials



3.3.6 In addition, 8% of respondents said that they had a second job, compared to 6% of respondents in 2017. Respondents were not asked what this job was or their main reasons for having a second job. It must be noted that the question in the Pay and Morale survey specifically asked about second jobs, rather than broader business interests as defined under police regulations, which can also include certain business interests of relatives.

3.3.7 Our survey data is not the only source of robust data that shows that officers are suffering the effects of pay that has been depressed over a number of years.

II. Police Mutual: financial wellbeing dashboard²⁰

3.3.8 Police Mutual, an organisation set up to facilitate the wellbeing of officers, provide financial education events and free financial advice to officers. Police Mutual developed a “financial wellbeing dashboard” to provide an estimate of people under high financial stress, based on Police Mutual Police Force database; using a range of financial indicators highlighting people whose finances are estimated to be getting out of control and those whose financial situations and home life may be challenging; that is based on disposable income, with the impact of interest rate changes factored in.

3.3.9 Police Mutual state that 6.2% of all UK officers and staff are under high financial stress, equivalent to 12,337 people and households affected. For the 18-29 year old cohort this was 9.3%.

3.3.10 Their data show that 17.6% of Constables have no savings. 16.7% felt their household finances have worsened, while 24% feel they will worsen. 1.2% said they were over 3 months behind on utility bills.

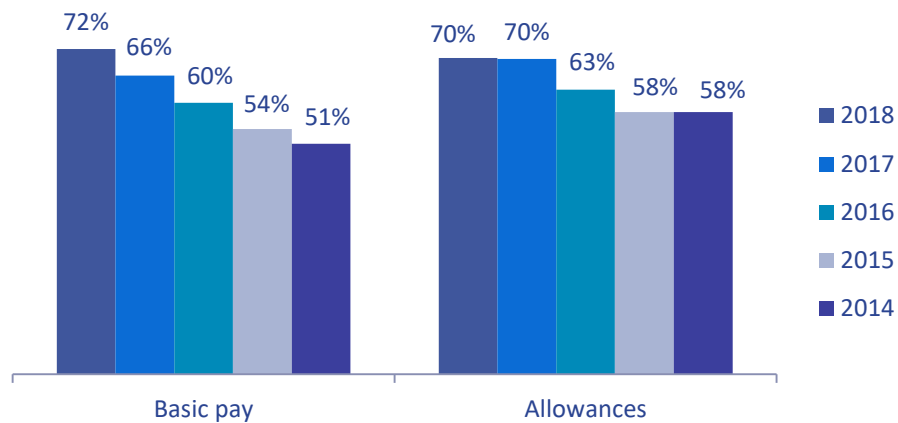
III. Satisfaction with remuneration

3.3.11 Officers’ dissatisfaction with their remuneration has also increased since last year: in 2018 72% of respondents said that they were dissatisfied with their basic pay, compared to 66% the previous year. Indeed, there has now been an increase in the proportion of respondents reporting dissatisfaction with their basic pay each

²⁰ Data supplied by Police Mutual to PCF, dated December 2018

year the Pay and Morale survey has been running; reflecting a 21 percentage point increase in dissatisfaction with basic pay. There has also been a 12 percentage point increase in the dissatisfaction with allowances over the same period.

Figure 10: Satisfaction with basic pay and allowances over time since 2014



3.3.12 78% of respondents disagreed that they were fairly paid considering the hazards faced within their job. In addition, 88% of respondents did not feel fairly paid considering the stresses and strains of their job, an increase of one percentage point on last year.

Figure 11: Perceptions of the fairness of pay

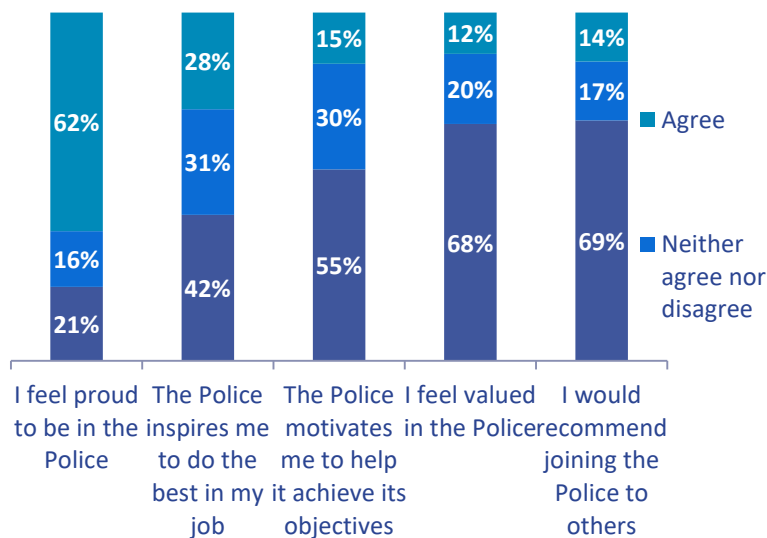
| Factor | Disagree | Agree |
|---|----------|-------|
| I am fairly paid considering the hazards I face within my job | 78% | 12% |
| I am fairly paid considering the stresses and strains of my job | 88% | 6% |
| I am fairly paid considering the amount of experience and training I have | 68% | 19% |

IV. Impact on morale and intention to leave

3.3.13 59% of respondents in this year's Pay and Morale survey said that their personal morale was low compared to 60% in 2017. Whilst it may be seen as of some solace that there has been no further decline in morale, this figure still represents a majority of officers reporting that their morale is low. This proportion also remains substantially higher than seen in comparator organisations, where the same questions are used. For example, in the 2018 Armed Forces Continuous Attitude Survey (AFCAS) 33% of non-officer ranks said that their morale was low.

3.3.14 More than two thirds of respondents said that they did not feel valued in the police and almost seven in every ten respondents would not recommend joining the police to others. In addition, only 28% of respondents agreed that the police inspires them to do the best in their job, and 55% of respondents did not feel that the police motivated them to achieve its objectives. 62% of respondents said that they were proud to be in the police. In general, these proportions are very similar to those seen in the 2017 survey.

Figure 12: Pride, motivation, and feeling valued.



3.3.15 Intention to leave the police has remained relatively stable compared to previous surveys. 12% of respondents said that they planned to leave the police either as soon as possible or within the next two years. This proportion is the same as in both 2017 and 2016.

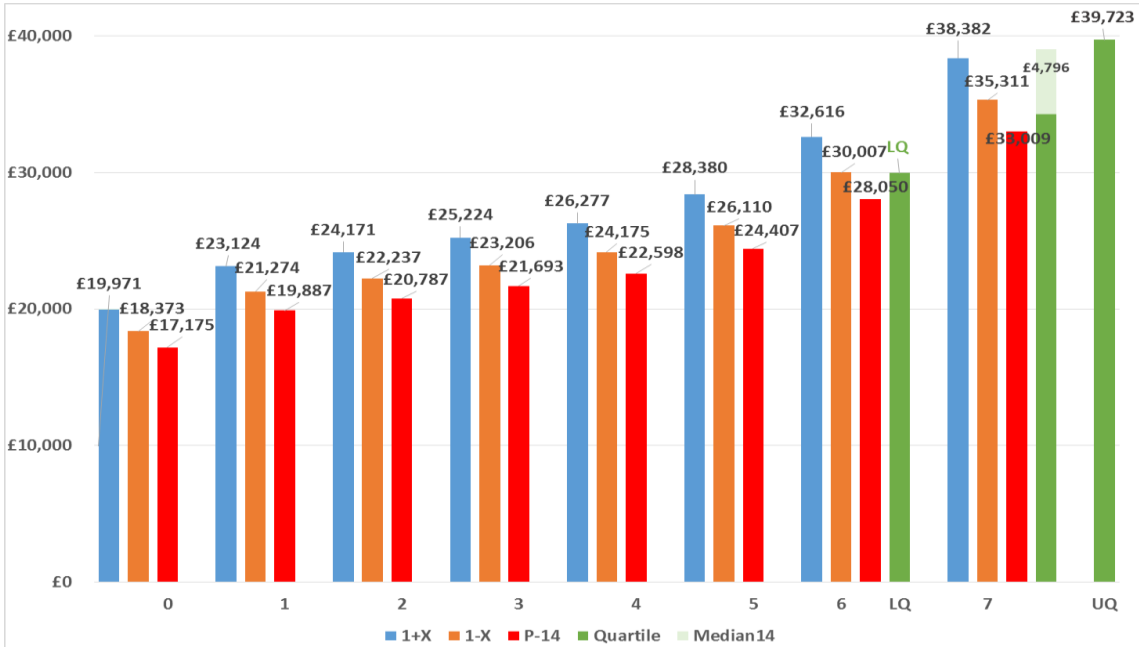
3.3.16 Notably, two thirds of respondents (67%) said that their pay and benefits had a major impact on their intention to leave, up from 62% last year. There has also been a four percentage point increase since last year in the proportion of officers who said that their pay and benefits had a negative impact upon their morale; and six percentage point increase compared to two years ago. In 2018 77% of respondents said that their pay and benefits had a negative impact upon their morale, in contrast to 73% of respondents in 2017 and 71% in 2016.

3.4 Calculating fair pay based on benchmarking and the P factor

- 3.4.1 As discussed in section 3.2, there has been a real terms gap in the value of police pay settlements (compared to RPI) of about 18%, since 2010.
- 3.4.2 We have heard a myth put forward by those seeking to suppress pay that officers were highly paid to start with: but this is no so. Even ignoring that inflation based calculation of a 19% gap, there is a different and compelling way of showing just how far officers' pay is from where it should be.
- 3.4.3 In chapter 2, section 7 (2.7) we described the NPCC's proposal that to calculate pay it is appropriate to benchmark a component of pay without the P factor against an appropriate comparator, and then add the P factor on top. We discussed our rationale for the choices of benchmark comparators, and stated that the NPCC initially valued the P factor at 8%, whereas we believe it should be equal to the military X factor, at 14%.
- 3.4.4 As officers already receive the X / P factor, it must be calculated and subtracted from the overall level of pay, in order to establish what the current pay level is that should be used in comparisons to other jobs.
- 3.4.5 The easiest way to show some of the calculations is to use graphs that were originally supplied by the NPCC. These reflect the NPCC definition of the P factor, as being 8%, which they stated was Winsor's valuation. However, we noted – and to their credit, the NPCC subsequently agreed – that Winsor calculated the 8% valuation as being for the danger and deployability elements only. The NPCC have also included a number of other elements in their definition of the P factor, and of late are suggesting it might be worth around 10%.
- 3.4.6 In the following graphs, the NPCC have taken officer pay, and shown what it would be were the P factor removed. Note that the data are 2017 data, reflecting the pay scales at that time. All figures calculated as being appropriate for officers in 2017 should be subject to 2 additional uplifts, which we believe should have been at least in line with market averages, which have been around 3% in 2018, and likely to be 3% in 2019.
- 3.4.7 We have added our own figures to the graphs provided by the NPCC. Where the NPCC have shown officer pay without the X/P factor as 1-X (where X is equal to 8%), we have shown it as 1-P14, where P is equal to 14%. We believe this shows

a truer picture of the difference between officer pay and the lower quartile, median, and upper quartiles derived from the Korn Ferry Hay data.

Figure 13: Constable pay points and Korn Ferry Hay medians.



3.4.8 This graph demonstrates that, whereas the NPCC have tried to demonstrate that Constable pay minus X / P is below the lower quartile until pay point 6, when it is approximately at the LQ, we would argue that (using these 2017 figures), even at point 6 Constable pay is nearly £2,000 below the LQ²¹. By our analysis, pay point 7 valued in 2017 without the P factor is £33,009 is below the KFH median, which is £34,252. We believe that an appropriate level for pay point 7 in 2017, using these data, would have been £39,050: that is, the median, plus 14%. Given that this is the highest career salary point that the vast majority – over 80% – of officers will ever attain, this is an essential point to get right.

3.4.9 However the above calculation assumes that Constables should only get to the median for the whole population after several years. The KFH benchmark takes no account of the experience gained, being a whole population median. We believe it is more appropriate to look at medians for employees with different levels of experience.

²¹ Note that these calculations are based on 2017 data, as used by the NPCC.

3.4.10 Using what we consider to be more appropriate data to that included on the original KFH/NPCC graphs leads us to conclude that the gap between what officers should earn, and what they do, is even wider.

3.4.11 Below we have calculated the difference between an appropriate median, and the “procedural justice” value (that is, where pay should be if it were calculated by benchmarking and then adding the P factor). We have done this for three points on the Constable scale: the bottom, (post degree), 5 years after joining, and the top of the scale. Hence, we benchmark against a starting salary for degree level jobs, and then consider 5 year progression levels similar to a small number of key public sector roles: eg paramedics, teachers. We have used teacher salaries, without a leadership role, for the top of the Constable scale. The following would be a pay scale for Constables that reflects such procedural justice:

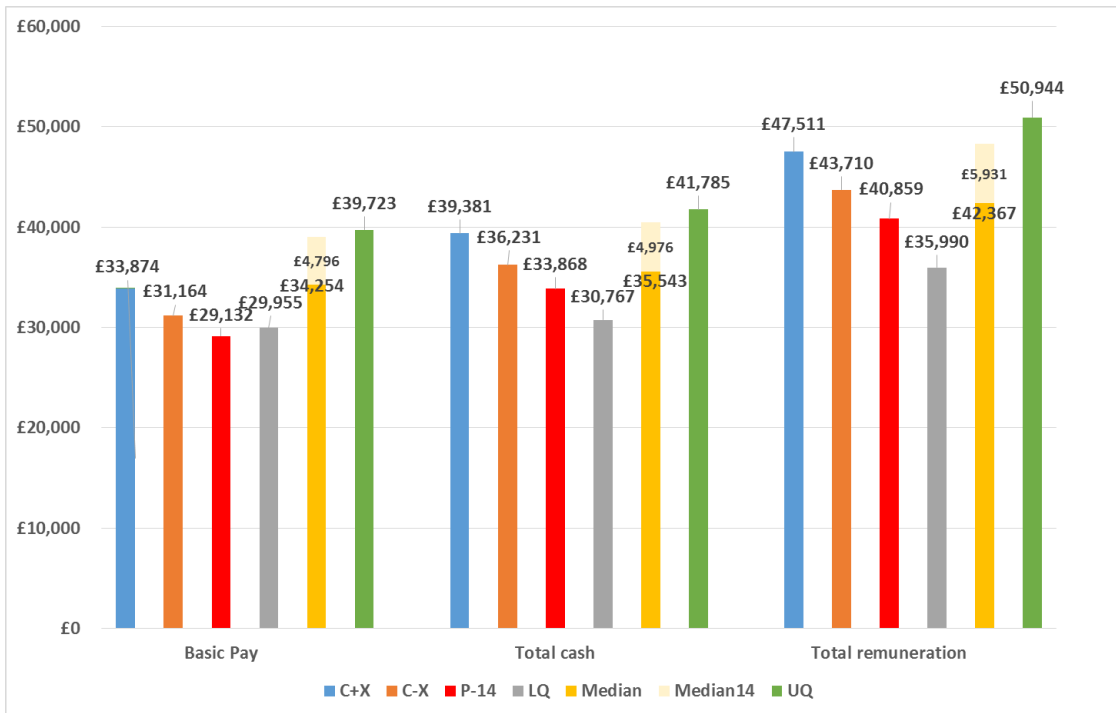
Figure 14: Constable Salaries calculated as median plus P factor.

| | Median of appropriate benchmark group | P factor @ 14% | Procedural justice salary calculation median + P @ 14% | Current shortfall based on 2018 salaries | Current shortfall as % |
|------------------------------------|---|-----------------------|---|---|-------------------------------|
| Starting salary all degree holders | £24,000 (XPERT HR degree holder median) | £3,360 | £27,360 | At pay point 1 £27,360 - £23,586 = <u>£3,774</u> | 16% |
| 5 years after joining | £30,030 (Paramedic at 5 years) | £4,204 | £34,204 | Pay pt 5 £34,204 - £28,947 = <u>£5,257</u> | 18% |
| Top of the scale | £39,406 (Teacher, without leadership role) ²² | £5,516 | £44,922 | Pay pt 7 in 2018 £44,922 - £39,150 = <u>£5,772</u> | 14.7% |

²² NASUWT Classroom teachers' salary scales

<https://www.nasuwt.org.uk/uploads/assets/uploaded/e2c3ba3f-20f3-410c-ae4b83329cbe3e4a.pdf>

Figure 15: Constable basic pay, total cash, and total remuneration



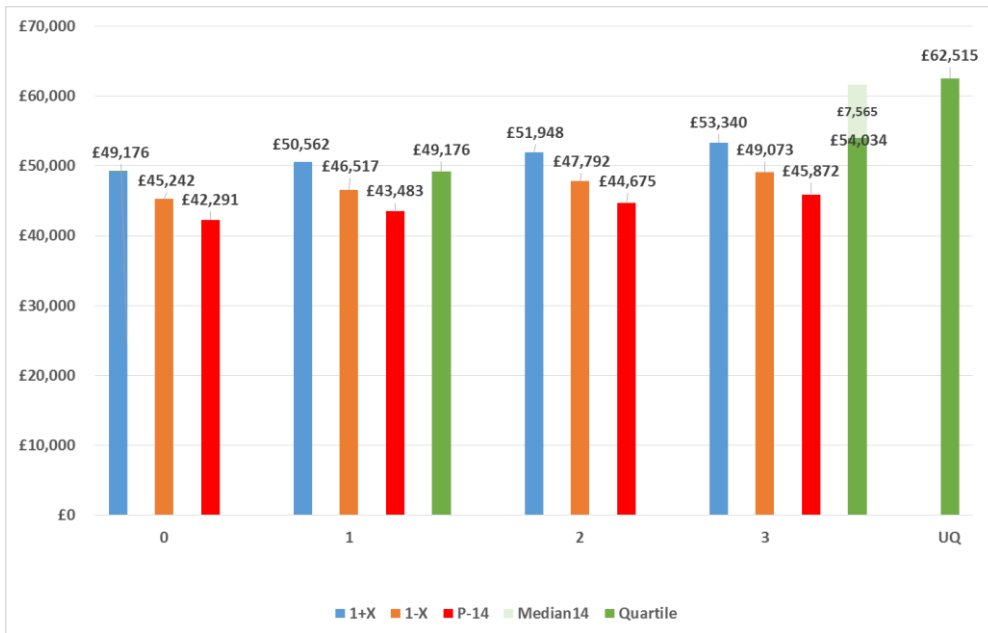
3.4.12 Again, when the P factor is appropriately calculated, the data tells a different story to that with which we have previously been presented. While current levels of salary, including the X factor, seem at face value to be approaching the median market values, the truth is rather different when the P factor is removed. On all three indicators – basic pay, total cash, and total remuneration, Constables’ pay is significantly below the median. (By £5,122; £1,675; and £1,508 respectively). Indeed, basic pay now falls below the KFH Lower Quartile.

Figure 16: Sergeant pay points and national KFH data



3.4.13 Here again, when the X / P factor is considered to be 14%, every pay point of the Sergeants' pay scale is below the median. The gaps are staggering. At the first pay point Sergeants pay without the P factor is £5,264 below the median of £39,400. That's nearly 14% below where it should be. At pay point 4 the relevant part of pay for comparison is £37,095, set against a comparator median of £46,098. That's a difference of £9,003, or over 19%.

Figure 17: Inspector pay points and KFH data.



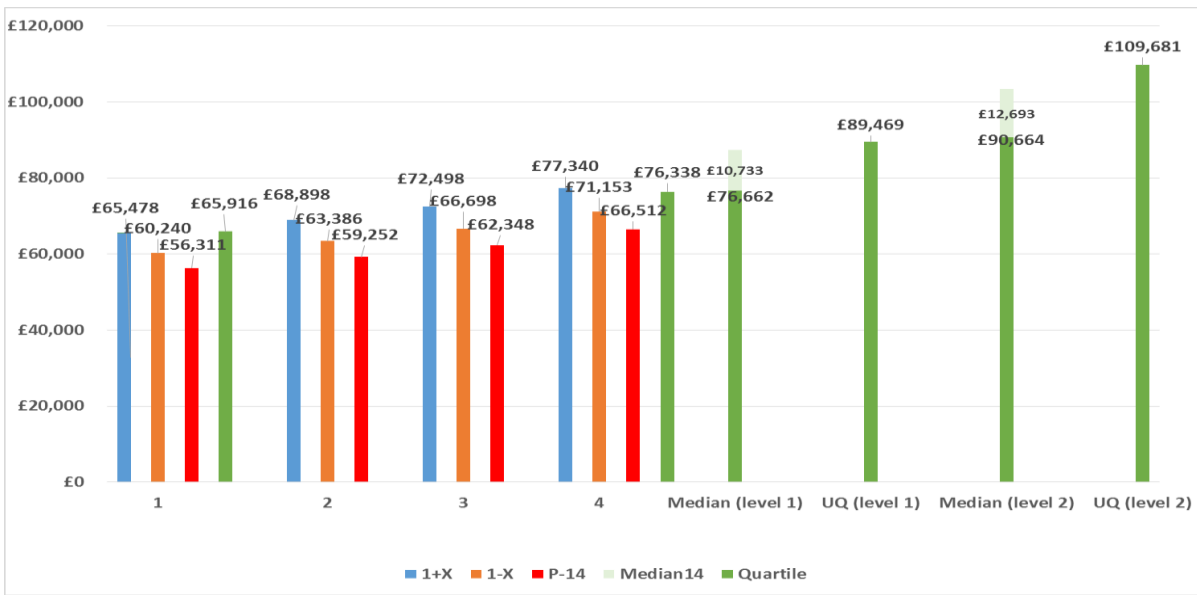
3.4.14 The KFH median for Inspectors is £54,034. The highest spine point is worth only £45,872, when the P factor is taken into account. That's around 16% below where it should be. The lowest spine point is 22% below.

Figure 18: Chief Inspector pay points and KFH data



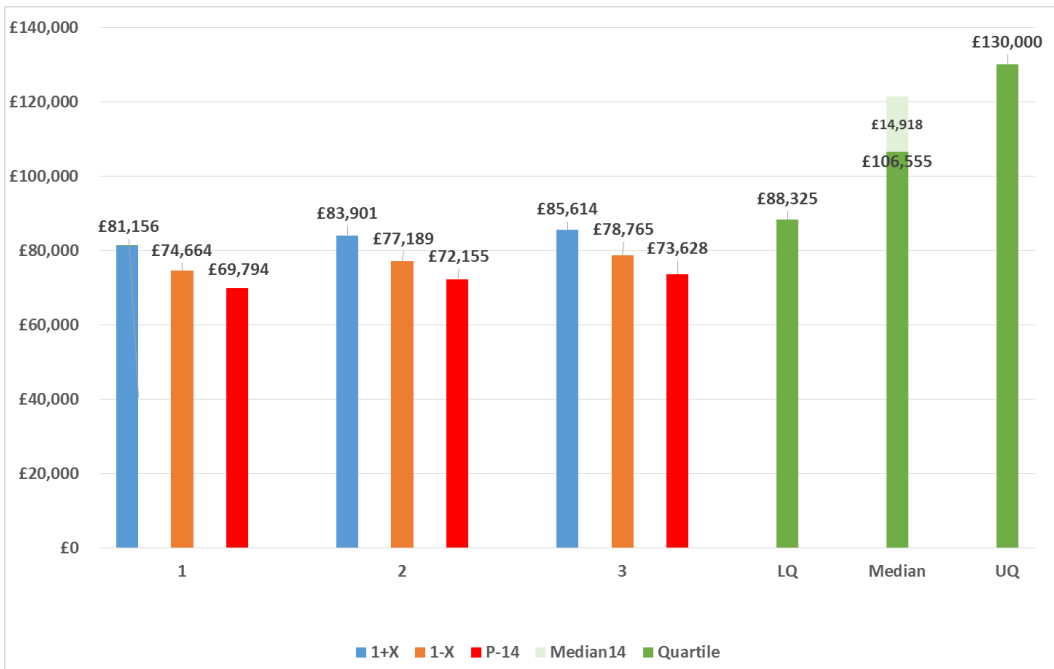
3.4.15 For Chief Inspectors, at spine point 3 the gap between the KFH median and pay minus the P factor is £15,119, or nearly 24%.

Figure 19: Superintendent pay points and KFH data



3.4.16 Superintendents' pay at spine point 4 is £13,324 below the KFH median level 2, if it is assumed they receive no P factor at all. It is a staggering £24,152 adrift from the KFH level 2 median, when the full P factor is taken into account.

Figure 20: Chief Superintendent pay points and KFH data.



- 3.4.17 The difference between Chief Superintendents' pay at spine point 3 and the KFH median is £20,941, if no assumption is made that Chief Superintendents receive the P factor. However, if they were to receive it, then the difference is £32,927.
- 3.4.18 In summary, we accept that the method proposed by the NPCC whereby officer pay is benchmarked against a median, and then an additional X / P factor is added on top. This offers procedural justice. We have made a case for the choice of comparator groups, including degree level jobs at entry level, now that policing is to be a profession in which most entrants will have degrees. We have also made a case for the P factor to be set at 14%, as is the military X factor. When the data are worked through, the conclusion is that currently Constables and Sergeants are being paid at a level at least 14-19% below that which they should be.
- 3.4.19 At annex 8 we have worked through the data for every rank. We have inserted an appropriate median, and then added the P factor at 14%. We have then calculated what salary increases would need to be for each for the next three years, in order to bring officers up to that level. We have done this without taking inflation into account, and then again with it.
- 3.4.20 We have also done the same calculations, using the NPCC valuation of the P factor (10%) instead.
- 3.4.21 In the interests of transparency, all calculations are shown in full at annex 8.
- 3.4.22 The headline figures are shown in figures 20 and 21, below. They are shocking. The discrepancy between what officers should be being paid – calculated using the NPCC's own method – and actual pay is scandalous.

Figure 21: Shortfall between current pay and pay calculated using NPCC mechanism

| Rank | Current Shortfall P@14% | Current shortfall P@10% |
|-----------------------------|------------------------------------|------------------------------------|
| Constable | | |
| entry level | 16.0% | 11.9% |
| 5 years in | 18.4% | 14.3% |
| top of scale | 14.7% | 10.7% |
| Sergeant | | |
| bottom | 10.9% | 7.0% |
| top | 19.4% | 15.3% |
| Inspector | | |
| bottom | 22.8% | 18.5% |
| top | 13.2% | 9.2% |
| Chief Inspector | | |
| bottom | 31.1% | 26.5% |
| top | 15.9% | 21.5% |
| Superintendent | | |
| bottom | 30.9% | 26.3% |
| top | 31.0% | 26.4% |
| Chief Superintendent | | |
| bottom | 46.7% | 41.6% |
| top | 39.1% | 34.2% |

Figure 22: uplift needed for the next 3 years to reach benchmark + P + inflation.

| | All % figures show the % uplift required every year over a 3 year period , to meet the target pay level, where target = | | | |
|-----------------------|--|--------------------------------|--------------------|--------------------------------|
| Rank and level | Benchmark + P@ 14% | Benchmark + P@ 14% + inflation | Benchmark + P@ 10% | Benchmark + P@ 10% + inflation |
| Constable | | | | |
| entry level | 5% | 7.3% | 3.8% | 6.1% |
| 5 years in | 5.8% | 8.1% | 4.6% | 6.8% |
| top of scale | 4.7% | 7.0% | 3.4% | 5.7% |
| Sergeant | | | | |
| bottom | 3.5% | 5.8% | 2.3% | 4.6% |
| top | 6.0% | 8.4% | 4.9% | 7.1% |
| Inspector | | | | |
| bottom | 7.1% | 9.4% | 5.8% | 8.1% |
| top | 4.2% | 6.5% | 3.0% | 5.2% |
| Chief Insp | | | | |
| bottom | 9.5% | 11.7% | 8.2% | 10.5% |
| top | 8.0% | 10.3% | 6.7% | 9.0% |
| Superintendent | | | | |
| bottom | 9.4% | 11.7% | 8.0% | 10.4% |
| top | 9.4% | 11.7% | 8.1% | 10.5% |
| Chief Super | | | | |
| bottom | 13.6% | 16.0% | 12.3% | 14.7% |
| top | 11.6% | 14.0% | 10.3% | 12.7% |

- 3.4.23 For Constables to reach the lower acceptable level of pay, where pay is set at 10%, and inflation is factored in, they would need an average (across all three pay points) rise of 6.2% each year for three years. Sergeants would need an average rise across pay points of 5.85%. Even ignoring inflation the rises would need to be 4% and 3.6% each year, respectively. Rises would, of course, need to be higher if the figure we suggest of 14% is accepted as the P factor rate.
- 3.4.24 The rises required at higher ranks are even more startling, albeit here we have also added the P factor at 14% and 10%, and we understand the NPCC may argue that the P factor should reduce as officers progress up the ranks.
- 3.4.25 We recognise that these figures are unlikely to be palatable to either the employer or government. The scale of uplift needed is likely to be alarming to them. For that reason, we understand that it is unlikely that there will be a “quick fix”. Sorting out the shortfall that has been created following several years of austerity is unlikely to happen within a three year window. Nonetheless, we believe it is essential that the NPCC demonstrates their commitment to the mechanism that they themselves have designed and trumpeted. We need to see that there is a meaningful direction of travel towards the level of pay that we have calculated by benchmarking against appropriate comparators, and adding the P factor.
- 3.4.26 We therefore recommend an across the board pay uplift for the next three years, which would allow the NPCC to demonstrate that commitment. We seek a deal of 5% in year 1, followed by 5% in each of years 2 and 3. This compromise would enable some movement towards the overall rectification of the gap between current pay level and just pay levels. It would ensure that, once the gap had started to be closed in year 1, in years 2 and 3 it would not become worse again, as pay would at least keep up with inflation. It would further ensure that none of the ranks – for whom, ultimately, differing degrees of reparation may be needed, have increases that worsen those existing differentials.
- 3.4.27 We would further seek that in future years, beyond these three, the NPCC would continue to work towards implementation of this pay mechanism.

3.5 Affordability

- 3.5.1 While central government funding for 2018/19 remained at the same level as 2017/18 in cash terms, this actually equated to a real terms fall in the value of central government funding for the police service, equivalent to around 1.5% for each force area.
- 3.5.2 However, while central funding has fallen, local funding has increased. The government relaxed the government imposed cap on the permissible level of precept increase that PCCs could raise locally.²³
- 3.5.3 This greater flexibility in England allowed PCCs to increase their Band D precept by up to £12 in 2018/19. The Home Office stated that each PCC “who uses this flexibility will be able to increase their direct resource funding by at least an estimated 1.6%”. It would enable an increase in funding to PCCs of up to £270m²⁴ in 2018/19 (in addition to continuing these arrangements for a second year in 2019/20).
- 3.5.4 Our analysis of PCC public information would seem to suggest that all PCCs in England proposed the maximum permissible increase. In Wales two PCCs proposed less than £12 (£10.69 in Dyfed-Powys, and £8.84 in North Wales). For the purposes of this paper we have followed the Government in assuming the maximum increase.
- 3.5.5 Although in real terms every force experienced a real terms increase in funding, there was great variation across force areas in terms of the level of funding growth²⁵. The discrepancy arises from the different socio-economic base of local authorities within each force area. Most notably whilst all PCCs might increase

²³ Previously increases were capped in England at 1.99%, with PCCs having to conduct a local referendum (with added costs) if they wished to increase the precept by more than this amount. (Welsh forces were not subject to this cap since the devolved Welsh Government chose not to cap the local precept).

²⁴ From £11.04bn in 2017/18 to £11.31bn in 2018/19.

²⁵ However it should be noted that the GDP deflator used by the Government is a limited measure of inflation devised to adjust the value of domestically produced goods and services (output) in the economy. Therefore it does not include inflation arising from imported goods (such as oil and other commodities), which lately have been especially affected by the fall in the value of sterling. In this respect CPI is a more realistic measure of price pressures experienced by forces (maintaining fleet of patrol cars for example). CPI at 3% in January is about 1.4% higher than the deflator measure at 1.6%.

their Band D rate by £12, this property band does not necessarily reflect the average band of property in their area. In many force areas the average band is either Band A or Band B. (For example Northumbria). This means that they are less able to raise the same level of local taxation as more affluent areas of the country. (For example, Surrey).

- 3.5.6 The police settlement for 2019/2020 is still being consulted on by PCCs, however it seems likely that the majority will increase the precept this year by the maximum allowed, £24.²⁶

²⁶ Provisional Police Grant Report 2019-2020. Home Office publication.
https://www.gov.uk/government/consultations/provisional-police-grant-report-2019-to-2020?utm_source=7f331b00-9f8f-4ecf-9d3b-c67e4a3b22c8&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate

Figure 23: Home Office table: Provisional Change in funding following 2019/20 settlement (from Provisional Police Grant Report).

Table 1: Provisional change in total resource funding for England and Wales 2019/20, compared to 2018/19 PCC

Total resource funding including pensions grant in 2019/20*

| 2018/19 £m | 2019/20 | | Cash increase |
|----------------------------------|-----------------|-----------------|---------------|
| Avon & Somerset | 281.7 | 302.9 | 21.2 |
| Bedfordshire | 104.6 | 112.7 | 8.0 |
| Cambridgeshire | 134.0 | 144.5 | 10.5 |
| Cheshire | 177.9 | 192.0 | 14.2 |
| City of London | 57.0 | 61.0 | 4.0 |
| Cleveland | 125.4 | 132.7 | 7.2 |
| Cumbria | 102.9 | 110.0 | 7.1 |
| Derbyshire | 167.2 | 179.6 | 12.4 |
| Devon & Cornwall | 291.3 | 314.1 | 22.8 |
| Dorset | 124.7 | 135.0 | 10.4 |
| Durham | 115.6 | 123.1 | 7.5 |
| Dyfed-Powys | 99.1 | 107.2 | 8.1 |
| Essex | 275.9 | 298.8 | 23.0 |
| Gloucestershire | 110.3 | 118.8 | 8.5 |
| Greater London Authority | 2,560.1 | 2,732.1 | 172.0 |
| Greater Manchester | 556.1 | 590.8 | 34.7 |
| Gwent | 123.5 | 132.0 | 8.5 |
| Hampshire | 314.2 | 339.2 | 25.0 |
| Hertfordshire | 188.9 | 204.9 | 16.0 |
| Humberside | 175.3 | 186.8 | 11.5 |
| Kent | 288.8 | 312.4 | 23.6 |
| Lancashire | 266.8 | 285.2 | 18.4 |
| Leicestershire | 175.5 | 188.2 | 12.7 |
| Lincolnshire | 113.9 | 122.4 | 8.6 |
| Merseyside | 312.6 | 330.9 | 18.2 |
| Norfolk | 153.6 | 164.8 | 11.2 |
| North Wales | 146.5 | 157.2 | 10.7 |
| North Yorkshire | 144.8 | 155.9 | 11.1 |
| Northamptonshire | 126.0 | 135.3 | 9.2 |
| Northumbria | 265.3 | 283.3 | 18.0 |
| Nottinghamshire | 195.1 | 208.2 | 13.1 |
| South Wales | 271.0 | 290.1 | 19.1 |
| South Yorkshire | 245.8 | 261.4 | 15.6 |
| Staffordshire | 182.7 | 195.9 | 13.3 |
| Suffolk | 116.2 | 125.3 | 9.2 |
| Surrey | 217.0 | 234.6 | 17.6 |
| Sussex | 264.9 | 287.2 | 22.3 |
| Thames Valley | 389.7 | 422.4 | 32.7 |
| Warwickshire | 94.1 | 101.5 | 7.4 |
| West Mercia | 205.8 | 221.9 | 16.2 |
| West Midlands | 534.3 | 568.6 | 34.2 |
| West Yorkshire | 418.1 | 446.6 | 28.5 |
| Wiltshire | 109.2 | 118.3 | 9.1 |
| Total England & Wales | 11,323.4 | 12,136.0 | 812.5 |

- 3.5.7 We have used the data available to calculate the cash increase for each force, based on the PCCs' precept uplift. This is shown on the table below as a total cash increase, and as a percentage increase on last year. Note that we have removed the pensions element from the cash increase, in order to account for that part of funding that is already committed. For that reason, whereas in the table on the previous page, which is taken from the Home Office's Provisional Grant report, the total cash increase is shown as £812.5 million, in our table below it is calculated as £669.8 million. (Force cash increases are also shown below with the pensions' element removed).
- 3.5.8 Using the total number of officers in each force, and the average Constable pay, we have assessed what level of increase to the current paybill would be possible within the bounds of the precept increase.
- 3.5.9 The table below demonstrates that sizable increases to the paybill would be feasible within the new precept level. In several cases the precept would allow for an increase to the paybill of nearly 20% (Surrey, Warwickshire, Wiltshire). The average across all forces is 13.4%. Even in those forces where the precept allows the smallest increase, (GMP, Merseyside, and West Midlands) an increase of 10% is within the boundaries of possibility.

Figure 24: Affordability within total funding - (adjusted for pensions element)

| | 2018/19 | 2019/20 | Cash increase | % cash increase | N officers | Total Constables' pay E&W average mean* | Cost of constables' total pay | | Funding increase as % of total Constables' pay costs |
|--------------------------|----------|---------|---------------|-----------------|------------|---|-------------------------------|------------|--|
| | £m | £m | £m | | | | | £m | |
| Avon & Somerset | 281.7 | 300.1 | 18.4 | 6.5% | 2,642 | £40,978 | £108,263,876 | £108.264 | 17.0% |
| Bedfordshire | 104.6 | 111.6 | 7.0 | 6.7% | 1,148 | £40,978 | £47,042,744 | £47.043 | 14.9% |
| Cambridgeshire | 134 | 143.1 | 9.1 | 6.8% | 1,420 | £40,978 | £58,188,760 | £58.189 | 15.6% |
| Cheshire | 177.9 | 189.9 | 12.0 | 6.7% | 2,003 | £40,978 | £82,078,934 | £82.079 | 14.6% |
| City of London | 57 | 60.2 | 3.2 | 5.6% | 734 | £40,978 | £30,077,852 | £30.078 | 10.6% |
| Cleveland | 125.4 | 131.4 | 6.0 | 4.8% | 1,224 | £40,978 | £50,157,072 | £50.157 | 12.0% |
| Cumbria | 102.9 | 108.8 | 5.9 | 5.7% | 1,174 | £40,978 | £48,108,172 | £48.108 | 12.3% |
| Derbyshire | 167.2 | 177.7 | 10.5 | 6.3% | 1,737 | £40,978 | £71,178,786 | £71.179 | 14.8% |
| Devon & Cornwall | 291.3 | 310.8 | 19.5 | 6.7% | 2,975 | £40,978 | £121,909,550 | £121.910 | 16.0% |
| Dorset | 124.7 | 133.6 | 8.9 | 7.1% | 1,225 | £40,978 | £50,198,050 | £50.198 | 17.7% |
| Durham | 115.6 | 121.8 | 6.2 | 5.4% | 1,141 | £40,978 | £46,755,898 | £46.756 | 13.3% |
| Dyfed-Powys | 99.1 | 105.9 | 6.8 | 6.9% | 1,171 | £40,978 | £47,985,238 | £47.985 | 14.2% |
| Essex | 275.9 | 295.9 | 20.0 | 7.2% | 2,960 | £40,978 | £121,294,880 | £121.295 | 16.5% |
| Gloucestershire | 110.3 | 117.6 | 7.3 | 6.6% | 1,071 | £40,978 | £43,887,438 | £43.887 | 16.6% |
| Greater London Authority | 2,560.10 | 2686.6 | 126.5 | 4.9% | 30,136 | £40,978 | £1,234,913,008 | £1,234.913 | 10.2% |
| Greater Manchester | 556.1 | 584.2 | 28.1 | 5.1% | 6,391 | £40,978 | £261,890,398 | £261.890 | 10.7% |
| Gwent | 123.5 | 130.7 | 7.2 | 5.8% | 1,329 | £40,978 | £54,459,762 | £54.460 | 13.2% |
| Hampshire | 314.2 | 336.2 | 22.0 | 7.0% | 2,741 | £40,978 | £112,320,698 | £112.321 | 19.6% |
| Hertfordshire | 188.9 | 202.9 | 14.0 | 7.4% | 1,983 | £40,978 | £81,259,374 | £81.259 | 17.2% |
| Humberside | 175.3 | 184.9 | 9.6 | 5.5% | 1,886 | £40,978 | £77,284,508 | £77.285 | 12.4% |
| Kent | 288.8 | 309.0 | 20.2 | 7.0% | 3,333 | £40,978 | £136,579,674 | £136.580 | 14.8% |
| Lancashire | 266.8 | 282.1 | 15.3 | 5.7% | 2,884 | £40,978 | £118,180,552 | £118.181 | 12.9% |
| Leicestershire | 175.5 | 186.3 | 10.8 | 6.2% | 1,765 | £40,978 | £72,326,170 | £72.326 | 14.9% |
| Lincolnshire | 113.9 | 121.2 | 7.3 | 6.4% | 1,117 | £40,978 | £45,772,426 | £45.772 | 15.9% |
| Merseyside | 312.6 | 327.3 | 14.7 | 4.7% | 3,409 | £40,978 | £139,694,002 | £139.694 | 10.5% |
| Norfolk | 153.6 | 163.2 | 9.6 | 6.3% | 1,598 | £40,978 | £65,482,844 | £65.483 | 14.7% |
| North Wales | 146.5 | 155.6 | 9.1 | 6.2% | 1,488 | £40,978 | £60,975,264 | £60.975 | 14.9% |
| North Yorkshire | 144.8 | 154.5 | 9.7 | 6.7% | 1,357 | £40,978 | £55,607,146 | £55.607 | 17.4% |
| Northamptonshire | 126 | 134.0 | 8.0 | 6.3% | 1,213 | £40,978 | £49,706,314 | £49.706 | 16.1% |
| Northumbria | 265.3 | 279.9 | 14.6 | 5.5% | 3,141 | £40,978 | £128,711,898 | £128.712 | 11.3% |
| Nottinghamshire | 195.1 | 206.2 | 11.1 | 5.7% | 1,968 | £40,978 | £80,644,704 | £80.645 | 13.8% |
| South Wales | 271 | 287.0 | 16.0 | 5.9% | 2,955 | £40,978 | £121,089,990 | £121.090 | 13.2% |
| South Yorkshire | 245.8 | 258.8 | 13.0 | 5.3% | 2,393 | £40,978 | £98,060,354 | £98.060 | 13.3% |

| | | | | | | | | | |
|----------------------------------|------------------|-----------------|--------------|-------------|----------------|----------------|-----------------------|-------------------|--------------|
| Staffordshire | 182.7 | 194.1 | 11.4 | 6.2% | 1,605 | £40,978 | £65,769,690 | £65.770 | 17.3% |
| Suffolk | 116.2 | 124.1 | 7.9 | 6.8% | 1,146 | £40,978 | £46,960,788 | £46.961 | 16.8% |
| Surrey | 217 | 232.6 | 15.6 | 7.2% | 1,928 | £40,978 | £79,005,584 | £79.006 | 19.7% |
| Sussex | 264.9 | 284.5 | 19.6 | 7.4% | 2,579 | £40,978 | £105,682,262 | £105.682 | 18.5% |
| Thames Valley | 389.7 | 418.1 | 28.4 | 7.3% | 4,045 | £40,978 | £165,756,010 | £165.756 | 17.1% |
| Warwickshire | 94.1 | 100.6 | 6.5 | 6.9% | 801 | £40,978 | £32,823,378 | £32.823 | 19.8% |
| West Mercia | 205.8 | 219.8 | 14.0 | 6.8% | 1,922 | £40,978 | £78,759,716 | £78.760 | 17.8% |
| West Midlands | 534.3 | 561.6 | 27.3 | 5.1% | 6,559 | £40,978 | £268,774,702 | £268.775 | 10.2% |
| West Yorkshire | 418.1 | 441.5 | 23.4 | 5.6% | 5,113 | £40,978 | £209,520,514 | £209.521 | 11.2% |
| Wiltshire | 109.2 | 117.3 | 8.1 | 7.4% | 986 | £40,978 | £40,404,308 | £40.404 | 20.0% |
| Total England & Wales | 11,323.40 | 11,993.2 | 669.8 | 5.9% | 122,396 | £40,978 | £5,015,543,288 | £5,015.543 | 13.4% |

3.5.10 We recognise, of course, that forces are unlikely be in a position to spend all of the increase in funding on pay. So, we have also looked at what the increase allows if only the paybill element is considered. That is, we have looked at the 80% of funding that currently is spent on the paybill, and assumed that that proportion will remain consistent.

3.4.8 Again, the forces best able to afford sizable uplifts are Surrey, Warwickshire, and Wiltshire, all at around 16%. The average across all forces is 10.7%. Even in those forces where the precept allows the smallest increase, (GMP, Merseyside, and West Midlands) an increase of over 8% is within the boundaries of possibility.

Figure 25: Affordability within paybill element of funding - (adjusted for pensions element)

| | 2018/19 | 2019/20 | Cash increase | % cash increase | N officers | Total Constables' pay E&W mean* | Cost of constables' total pay | | Funding increase as % of total Constables' pay costs |
|--------------------------|---------|---------|---------------|-----------------|------------|---------------------------------|-------------------------------|------------|--|
| | £m | £m | £m | | | | | £m | |
| Avon & Somerset | 225.36 | 240.1 | 14.7 | 6.5% | 2,642 | £40,978 | £108,263,876 | £108.264 | 13.6% |
| Bedfordshire | 83.68 | 89.3 | 5.6 | 6.7% | 1,148 | £40,978 | £47,042,744 | £47.043 | 11.9% |
| Cambridgeshire | 107.2 | 114.5 | 7.3 | 6.8% | 1,420 | £40,978 | £58,188,760 | £58.189 | 12.5% |
| Cheshire | 142.32 | 151.9 | 9.6 | 6.7% | 2,003 | £40,978 | £82,078,934 | £82.079 | 11.7% |
| City of London | 45.6 | 48.2 | 2.6 | 5.6% | 734 | £40,978 | £30,077,852 | £30.078 | 8.5% |
| Cleveland | 100.32 | 105.1 | 4.8 | 4.8% | 1,224 | £40,978 | £50,157,072 | £50.157 | 9.6% |
| Cumbria | 82.32 | 87.0 | 4.7 | 5.7% | 1,174 | £40,978 | £48,108,172 | £48.108 | 9.8% |
| Derbyshire | 133.76 | 142.2 | 8.4 | 6.3% | 1,737 | £40,978 | £71,178,786 | £71.179 | 11.8% |
| Devon & Cornwall | 233.04 | 248.6 | 15.6 | 6.7% | 2,975 | £40,978 | £121,909,550 | £121.910 | 12.8% |
| Dorset | 99.76 | 106.9 | 7.1 | 7.1% | 1,225 | £40,978 | £50,198,050 | £50.198 | 14.2% |
| Durham | 92.48 | 97.4 | 5.0 | 5.4% | 1,141 | £40,978 | £46,755,898 | £46.756 | 10.6% |
| Dyfed-Powys | 79.28 | 84.7 | 5.4 | 6.9% | 1,171 | £40,978 | £47,985,238 | £47.985 | 11.3% |
| Essex | 220.72 | 236.7 | 16.0 | 7.2% | 2,960 | £40,978 | £121,294,880 | £121.295 | 13.2% |
| Gloucestershire | 88.24 | 94.1 | 5.8 | 6.6% | 1,071 | £40,978 | £43,887,438 | £43.887 | 13.3% |
| Greater London Authority | 2048.08 | 2149.3 | 101.2 | 4.9% | 30,136 | £40,978 | £1,234,913,008 | £1,234.913 | 8.2% |
| Greater Manchester | 444.88 | 467.4 | 22.5 | 5.1% | 6,391 | £40,978 | £261,890,398 | £261.890 | 8.6% |
| Gwent | 98.8 | 104.6 | 5.8 | 5.8% | 1,329 | £40,978 | £54,459,762 | £54.460 | 10.6% |
| Hampshire | 251.36 | 269.0 | 17.6 | 7.0% | 2,741 | £40,978 | £112,320,698 | £112.321 | 15.7% |
| Hertfordshire | 151.12 | 162.3 | 11.2 | 7.4% | 1,983 | £40,978 | £81,259,374 | £81.259 | 13.8% |
| Humberside | 140.24 | 147.9 | 7.7 | 5.5% | 1,886 | £40,978 | £77,284,508 | £77.285 | 9.9% |
| Kent | 231.04 | 247.2 | 16.2 | 7.0% | 3,333 | £40,978 | £136,579,674 | £136.580 | 11.8% |
| Lancashire | 213.44 | 225.7 | 12.2 | 5.7% | 2,884 | £40,978 | £118,180,552 | £118.181 | 10.4% |
| Leicestershire | 140.4 | 149.0 | 8.6 | 6.2% | 1,765 | £40,978 | £72,326,170 | £72.326 | 11.9% |
| Lincolnshire | 91.12 | 97.0 | 5.8 | 6.4% | 1,117 | £40,978 | £45,772,426 | £45.772 | 12.8% |
| Merseyside | 250.08 | 261.8 | 11.8 | 4.7% | 3,409 | £40,978 | £139,694,002 | £139.694 | 8.4% |
| Norfolk | 122.88 | 130.6 | 7.7 | 6.3% | 1,598 | £40,978 | £65,482,844 | £65.483 | 11.7% |
| North Wales | 117.2 | 124.5 | 7.3 | 6.2% | 1,488 | £40,978 | £60,975,264 | £60.975 | 11.9% |
| North Yorkshire | 115.84 | 123.6 | 7.8 | 6.7% | 1,357 | £40,978 | £55,607,146 | £55.607 | 14.0% |
| Northamptonshire | 100.8 | 107.2 | 6.4 | 6.3% | 1,213 | £40,978 | £49,706,314 | £49.706 | 12.9% |
| Northumbria | 212.24 | 223.9 | 11.7 | 5.5% | 3,141 | £40,978 | £128,711,898 | £128.712 | 9.1% |
| Nottinghamshire | 156.08 | 165.0 | 8.9 | 5.7% | 1,968 | £40,978 | £80,644,704 | £80.645 | 11.0% |
| South Wales | 216.8 | 229.6 | 12.8 | 5.9% | 2,955 | £40,978 | £121,089,990 | £121.090 | 10.6% |
| South Yorkshire | 196.64 | 207.0 | 10.4 | 5.3% | 2,393 | £40,978 | £98,060,354 | £98.060 | 10.6% |
| Staffordshire | 146.16 | 155.3 | 9.1 | 6.2% | 1,605 | £40,978 | £65,769,690 | £65.770 | 13.9% |
| Suffolk | 92.96 | 99.3 | 6.3 | 6.8% | 1,146 | £40,978 | £46,960,788 | £46.961 | 13.5% |

| | | | | | | | | | |
|----------------------------------|--------------|----------|-------|------|---------|---------|----------------|------------|--------------|
| Surrey | 173.6 | 186.1 | 12.5 | 7.2% | 1,928 | £40,978 | £79,005,584 | £79.006 | 15.8% |
| Sussex | 211.92 | 227.6 | 15.7 | 7.4% | 2,579 | £40,978 | £105,682,262 | £105.682 | 14.8% |
| Thames Valley | 311.76 | 334.5 | 22.7 | 7.3% | 4,045 | £40,978 | £165,756,010 | £165.756 | 13.7% |
| Warwickshire | 75.28 | 80.5 | 5.2 | 6.9% | 801 | £40,978 | £32,823,378 | £32.823 | 15.8% |
| West Mercia | 164.64 | 175.8 | 11.2 | 6.8% | 1,922 | £40,978 | £78,759,716 | £78.760 | 14.2% |
| West Midlands | 427.44 | 449.3 | 21.8 | 5.1% | 6,559 | £40,978 | £268,774,702 | £268.775 | 8.1% |
| West Yorkshire | 334.48 | 353.2 | 18.7 | 5.6% | 5,113 | £40,978 | £209,520,514 | £209.521 | 8.9% |
| Wiltshire | 87.36 | 93.8 | 6.5 | 7.4% | 986 | £40,978 | £40,404,308 | £40.404 | 16.0% |
| Total England & Wales | 9,058.7 2 | 9,594.56 | 535.8 | 5.9% | 122,396 | £40,978 | £5,015,543,288 | £5,015.543 | 10.7% |

** All pay - officers & staff

3.5.11 This provides an opportunity for forces to begin to redress the unfairnesses of the last nine years of below inflation pay settlements. Above inflation rises are possible, and fair.

3.5.12 Forces have a choice over what to spend their money on. We believe it is only right that forces should invest in the wellbeing and morale of officers by paying a fair wage. Research shows that workers who feel that their organisation has treated them justly are more motivated, and better workers: in this case, providing service to the public.²⁷

3.5.13 Crucially, the Home Secretary noted in his letter regarding the police grant to the Chair of the House of Commons Home Affairs Select Committee, Yvette Cooper, on 13th December 2018 “This settlement is the last before the next Spending Review, which will set long term police budgets and look at how resources are allocated fairly across police forces”. The Comprehensive Spending Review is an opportunity for appropriate funding for pay reform to be sought. We need to see the NPCC taking this opportunity to secure the right monies to enact this change. We have offered to work with them on this: in particular, modelling the costs of a fair pay system.

3.6 The application of the pay award

3.6.1 Having set out our concerns regarding the pay reform framework, and in particular regarding the dataset, method and sequence used for benchmarking, and practicalities of introducing anything other than incremental pay to the Constable

²⁷ Greenberg, J. (1987). A taxonomy of organizational justice theories. *Academy of Management Review*, 12, 9-22.

pay scale, we can only insist that this year's award is applied across the board to all. Any move from the current pay scales would be premature.

- 3.6.2 We have been dismayed in the past by suggestions that pay will be "held back" in order to enact the reform. This effectively means that officers are suffering because of the NPCC's failures. Their inability to move forward in a timely and constructive way with the reform programme must not be allowed to hamper officers' ability to access a fair pay award.
- 3.6.3 This year we hear that the NPCC are seeking to have a three year "deal", potentially with a pay freeze in the second year. The justification they have given is that it will make their modelling of pay assumptions easier, as it creates more "known" variables. They say it gives officers certainty.
- 3.6.4 To be very clear, we are not against the idea of a 3 year settlement. However, we are concerned that the NPCC proposal we have heard is an exceptionally poor one: it seems only to window dress the suppression of pay for current officers. It does nothing to make good on the NPCC's own aspiration that pay should be benchmarked and a P factor added. If that is what the NPCC truly seek to do, then it is time to start. We are concerned lest the NPCC will seek to only budget for benchmarked pay at some point in the future, when they have enacted pay reform. But fair pay, calculated in a similar way, must be the case for all officers, whether they are already in service, or likely to join under the reformed pay system.
- 3.6.5 By using the NPCC's own espoused methodology, benchmarking against appropriate external comparators, and then – and only then – adding a premium for the P factor, we have shown at annex 8 degree qualified Constables should be earning £27,360 as a starting salary, £34,280 5 years in, and £44,923 at the top of their scale. The differences between these figures and current salaries is between 14.7% and 18.4%.
- 3.6.6 We understand the NPCC are keen to reach a three year settlement, as this will give them certainly within their modelling framework. We have calculated that not only does this year's settlement allow for a 5% uplift this year, it also appears to allow considerable "bandwidth" that would allow for a further appropriate sized settlement next year.
- 3.6.7 As noted earlier, we seek a three year settlement that is commensurate with the

NPCC's espoused way of calculating pay in the future, and demonstrates their commitment to that process. That is, we seek a settlement, over three years, that takes officers towards the level at which they should be when pay is benchmarked against appropriate comparators, and then the P factor is added.

- 3.6.8 Our calculations, setting the P factor at 14%, suggest that in order to bring Constables up to the level that they should be at, increases of at least 7-8% in each of the next three years would be needed (even assuming CPI of only 2.1%). However, we understand that the NPCC values the P factor significantly lower, at 10%. If the same calculations are done, then Constables would need average increases of 6.2% in each of the next three years to bring them to the pay levels they should be at.
- 3.6.9 Therefore, if a three year settlement is not offered then we seek an uplift of 6.2% this year. (That being the average amount that Constables would need, across the three pay points for which we have calculated figures, for each of the next three years to reach the level at which their pay should be if the P factor is valued at 10%). .
- 3.6.10 We support the NPCC's view that the OME should independently value the P factor, and have no desire to thwart that process. We therefore seek to compromise, by asking for a 3 year settlement that brings officers within sight of the bottom of the likely range of the P factor – ie, where it is valued at 10%. We suggest a three year settlement of 5% in year 1, followed by 5% in year 2, and 5% year 3. This will not bring officers up to the level we have calculated, but it will at least indicate a commitment to do so. We seek for this to be reviewed if – as we expect – the OME calculate the P factor to be worth more than 10%.
- 3.6.11 We have considered the affordability of such a settlement. In section 3.5, we provide our analysis, using the settlement for this year that allows Police and Crime Commissioners (PCCs) to seek an extra £24 from households. We demonstrate that this uplift that this can easily be achieved within this year's pay settlement. In fact, we believe the current settlement is adequate to fund these uplifts in year 1 and year 2. The coming CSR provides an opportunity to ensure this is affordable in year 3.

3.6.12 Recommendation 3: In light of the analysis provided in this submission, which demonstrates that officers have fallen significantly between where they should be, both in terms of inflation, and if the NPCC's own mechanism for calculating a fair pay level were to be enacted, we seek an across the board pay rise for our members of 5% this year, which we believe would be a demonstration that there is a willingness to act on the NPCC's proposed mechanism for calculating pay (by benchmarking and adding the P factor). If a three year settlement is not an option then we seek a one year settlement of 6.2%, in line with the average amount needed each year for three years to bring Constables up to the level that we believe they should be at.

4 Chapter 4 Apprentice pay progression

- 4.1.1 At the time of writing, in early February, no proposals for pay progression for apprentices have been brought to the PCF. Over the last year we have seen some modelling of the likely pay points were PCDA pay to increase each year by, for example, 2%, or 105, or in £3,000 increments. None of these were presented as firm proposals, however.
- 4.1.2 We have interviewed six PCDA's to date, as part of a research project to track their experiences, and find out the pros and cons of the scheme, so that we can represent members from an evidenced perspective. Several of these stated that while they were willing to "take a hit" on starting salary, to £18,000, this was only in expectation that they would be returned to the incremental scale thereafter. (See PCDA qualitative research findings, below).
- 4.1.3 On 15th January we received an informal copy of the briefing on Pay Reform to be given to Chief Constables the next day. This includes the recommendation that "Progression for Apprentices and Degree Holder Entry Programme (DHEP) will be determined locally by Chief Officers with an expectation that they will reach the foundation constable point (circa. £25,000 p.a) upon graduation". It should be noted we do not recognise the term "foundation constable point" and would appreciate clarity as to what it means.
- 4.1.4 This is important because we have been led to believe that constables will be considered to put on the bottom of pay stage 2 when they graduate, or achieve ARC: and the NPCC has to date equated these two events. Currently, passing ARC takes them to pay point 4 (£26,802). If the NPCC is now saying that passing ARC takes Constables £25,000 then either it is intending to reduce the pay, or there is an error. We are concerned lest this error be used in pay modelling.

**Figure 26: Constable Pay scale
September 2018**

**With effect from 1
September 2018**

| Pay point | |
|------------------|----------------|
| 0 | £20,370 (b, c) |
| 1 | £23,586 (d) |
| 2 | £24,654 (e) |
| 3 | £25,728 |
| 4 | £26,802 |
| 5 | £28,947 |
| 6 | £33,267 |
| 7 | £39,150 |

4.1.5 Aside from the fact this recommendation does not make sense, given that DHEP candidates will already have graduated on entry, we have the following concerns about this in both principle and practice:

- It is symptomatic of the disdain with which the NPCC has treated the staff associations since the PRRB was enacted, that we only received this three weeks before the PRRB submission; and that this was not received for consultation, but rather for information. Notably last year we were not given formal sight of the starting salary proposed, before the PRRB were, so this is becoming a pattern.
- This represents a major shift away from the use of a mandated pay scale, to Chief Constable discretion regarding how new entrants will be treated during the first years of service. Such a significant shift needs proper consideration and debate. Our survey data suggests this will be ill-received: in our Pay and Morale survey more than half (52%) felt that it was unfair for pay to be at the discretion of the Chief Constable of each force, rather than being nationally determined, compared to just 17% who said that it was fair for pay to be determined locally.

- Past experience has shown that where elements of pay have been discretionary, there has been significant impact in terms of equality of pay. There has been no equality impact assessment of how this recommendation might play out, nor any acknowledgement that one is needed. Whilst the NPCC may be content to take this significant risk, our concerns are that this will undoubtedly impact on members' pay; on their perceptions of fairness, and morale; and ultimately on the need for the staff associations to take litigation, where we are presented with cases. Yet again, this puts the staff associations in the position of having to stand ready to take legal action to protect members, instead of being included in a mature and balanced dialogue.
- Further, the decision of the PRRB last year, communicated to the Home Secretary on 30th April 2018, that Police Constable Degree Apprentices (PCDA) could be paid a starting salary of £18,000, has not yet been laid in a determination. A consultation on a draft determination was begun in early November, some two months after the first recruits started on salaries of £18,000. Our understanding is that this is not lawful, as this figure is not part of the current payscale, and we wrote to the NPCC in early November. We await a conclusion to this matter.
- We find it difficult to see how this move is in keeping with either the NPCC's espoused principle that the pay reform "will deliver a basic national pay structure for officers at all ranks" or the principle that "it will support closure of the gender pay gap". Indeed, it will likely do the opposite.

4.1.6 In this case discretionary pay levels are being suggested for those at the very outset of their careers: those most vulnerable to unfairness, being less likely to challenge, for fear of impact on how line managers perceive them, and also less likely to have a supportive network already in place, who might help them find a route to do so.

4.1.7 Last year in April 2018 the PRRB asked for recommendations on progression from the NPCC. They have therefore had a full year to work this through. It is staggering that their proposal now seems merely to lob the problem of deciding how to pay PCDA (and also DHEP) candidates to local forces.

4.1.8 We question whether the PRRB should be considering this proposal as it applies to DHEP candidates, as this is not included in the remit letter, nor had we any warning of it.

4.1.9 We call on the PRRB to dismiss this suggestion by the NPCC, and insist instead that those entering via both the PCDA and DHEP routes are properly and consistently remunerated using the existing payscales. We believe the PRRB recommendation from April last year should stand, which was that officers should be moved to pay point 1 or 2, the next one from where they started, after twelve months.

26. We consider that when appointed, an apprentice constable should be clear on how their pay will progress through their apprenticeship and beyond. Therefore, any appointees must receive the pay, and the pay progression, that they expect upon appointment and should not suffer detrimental changes to this prior to the end of their apprenticeship. On this basis we recommend that, subject to further review in the next pay round, **police forces should appoint apprentice constables on a starting salary of between £18,000 and pay point 1 (currently £23,124). We also recommend that following twelve months, and subject to satisfactory completion of Year 1 of their apprenticeship, the apprentice constable should move to the next paypoint on the existing police constable payscale, which would be paypoint 1 or 2 depending where on the pay scale the apprentice was appointed.**

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V. PCDA Qualitative Research: Findings

4.1.10 We have begun a research project to track PCDAs' experiences. This is to inform our policy. We interviewed six PCDAs between two and three months after they joined the service. It is our intention to track their progress with follow up interviews and surveys. The findings suggest that these officers had very little information about the scheme before they joined. Indeed, all but one had applied through another route, and then were offered the PCDA scheme. They didn't know about the starting salary at the point of application, and in many cases accepted that on the assumption that they would progress up the normal payscale thereafter.

²⁸ PRRB recommendation on Apprentice pay, 2018. Police Remuneration Review Body Report, 2018. Appendix C, letter to the Home Secretary dated 30 April 2018. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728354/Final_PRRB_EW_2018_Report_-_web_accessible.pdf

Pay and allowances

- 4.1.11 Everyone said that they were on £18,000; some had been told that they would go up to Pay Point 1 (£23.5k ish) at the end of their first year, others hadn't been told or had only heard rumours about what they'd be on. (Everyone said that they would be signed off for Independent Patrol Status between July and September 2019).
- 4.1.12 A number commented about the fact that they were taking a "hit" with £18k in the short-term but they didn't see it as a sustainable salary, a sort of "short-term pain for long-term gain" as one person put it, e.g. one person said that they'd opted out of the pension scheme until their salary had increased, another said that they'd taken a pay cut in the short-term because they knew they'd be receiving regular salary increments thereafter. They were also comments around the fact that they saw £18k as a training rate, but it wasn't really a fair salary if they were going out and doing a regular officer's role.
- 4.1.13 In terms of travel expenses, Derbyshire had been told they could claim back excess mileage travelling to university, Nottinghamshire had put on a bus to get people to uni (they were at Derby uni as well), Leicestershire hadn't been told anything. Leicestershire also hadn't been told anything about entitlement to allowances (e.g. unsocial hours payment) either.

PCDAs' Backgrounds

- 4.1.14 Out of the six PCDA officers, three already had some prior experience in the police, one had been a PCSO, one had been an enquiry officer and one had been a Special; one person had previously been in the armed forces
- 4.1.15 The other jobs they had come from included working in a bank, adult social care, HGV driver, working in a warehouse and retail manager.
- 4.1.16 The two people who had been in a police staff role said that the salary there were now on was lower than when they were a member of police staff and two of the other interviewees had also taken a pay cut (both from around £20k).

4.1.17 Two interviewees already had degrees. They said that their force (Leicestershire) had had difficulty getting people onto the PCDA scheme so was signing up people whether or not they had a degree. Both said that there were a number of others on the scheme who also had degrees

4.1.18 PCDAAs were generally aged late 20s, or early 30s. One person said that on their cohort the average age was around 27, others said that there was a relatively even split between “older” i.e. late 20s onwards and “younger”, early 20s officers. Three said that they had children/step-children.

Attitudes to the PCDA scheme

4.1.19 Only one person had specifically applied for the PCDA scheme, the others had been applying for the standard entry route and had been asked whether they wanted to apply. The one person who had applied specifically for the PCDA scheme had previously applied via the standard route but not been successful

4.1.20 Interviewees viewed some aspects of the PCDA scheme positively. Amongst the positives included a “free” degree, but other reasons included the fact that if everyone would have to have a degree in future it made sense to get on the “bandwagon”. Interviewees also liked the structure of the “experiential learning” aspect of the course – they liked the fact that they would have placements to different departments for longer periods of time than they would if they’d done the IPLDP course’.

4.1.21 Another reason for joining the scheme given by a number of the interviewees was that it gave a guaranteed start date, whereas the standard route didn’t (several interviewees said they now felt annoyed that people had actually joined via the standard route around the same time they started the PCDA, so they could in retrospective have been on the standard route – who were progressing quicker through the training because they didn’t have to do the university work).

4.1.22 All were concerned about the impact of study on the job, work-life balance etc. when they got on to the tutor phase and beyond. All were being given protected learning, but the structure of the course seemed to mean that they were doing the university study effectively on top of IPLDP, so were already having to split their time two ways. They were also concerned about how they would be received by colleagues and line managers, for example when they had to take study leave.

Communication issues

4.1.23 A number commented about the fact that they were taking a “hit” with £18k in the short-term but they didn’t see it as a sustainable salary, a sort of “short-term pain for long-term gain” as one person put it, e.g. one person said that they’d opted out of the pension scheme until their salary had increased, another said that they’d taken a pay cut in the short-term because they knew they’d be receiving regular salary increments thereafter. They were also comments around the fact that they saw £18k as a training rate, but it wasn’t really a fair salary if they were going out and doing a regular officer’s role.

4.1.24 In terms of travel expenses, Derbyshire had been told they could claim back excess mileage travelling to university, Nottinghamshire had put on a bus to get people to university (they were at Derby university too). Leicestershire hadn’t been told anything. Leicestershire also hadn’t been told anything about entitlement to allowances (e.g. unsocial hours payment) either.

4.1.25 We believe these findings lend weight to our recommendation that PCDA officers should progress along the same scale as others, as soon as possible. This is based on three key facts:

- These officers have already joined, and have a legitimate expectation they will progress up the payscale, in the absence of other information.
- The NPCC have failed to provide a realistic alternative proposal.
- As noted in our submission to the PRRB last year, these officers will be doing the same role as those on other schemes at the point of sign off on Independent Patrol status. There are serious questions to be asked about the legality of paying them a lower rate than others for doing the same job: especially if it transpires that – as hoped – the candidates have greater diversity than those who come in via other routes.

5 Chapter 5 On Call

- 5.1.1 The remit letter this year refers to Superintendents' On Call Allowance, rather than the On Call Allowance for all. Nonetheless, we understand the NPCC will be making a recommendation for all ranks.
- 5.1.2 On Call Allowance was introduced by Winsor, and there were a couple of Police Arbitration Tribunals to set the rate. However, prior to this the PNB had been discussing an on-call allowance, and Staff Side had submitted a claim. The reasoning for the claim at that time was that the use of on call was increasing and that an allowance should be introduced to reduce the reliance by forces, on on call. When Winsor recommended it in 2011 he said that the rate of the allowance should be reviewed after three years - which would have been 2014. He also said that forces should compile clear management data on the voluntary deployment of officers on call.
- 5.1.3 In November 2018 the NPCC asked us for comments on a survey that it had drafted regarding the On call Allowance. We hoped that the survey might be part of the review of On Call that Winsor, and latterly the PRRB, had suggested. (The PRRB has said in recent times that the allowance should be reviewed as part of a wider review of allowances (and considered for Supers). They said this in response to reports of the frequency, burden and breadth of on-call duties across all ranks having increased. They also said (2018) that allowances should be appropriately constructed and obtain the objective for which they are intended).
- 5.1.4 To that end, we sent a number of comments to the NPCC on 21st November, within the period we had been asked to supply them.
- 5.1.5 In order to try to be of as much practical help to the NPCC as possible, we assessed their survey from two perspectives: first regarding what the allowance is for, and what we believed should be the scope of the review (what we need to know in order to set policy), and second, a more technical look at the survey questions. Some key suggestions were:
- With regard to what the scope of the review should be, we suggested the scope of the review should be the rate, and the use of on call. Specifically we asked that the review should assess: to what extent the use of on-call has increased; what it is actually being used for; and whether the rate of the allowance is sufficient to engender the behaviours intended.

- We queried the methodology, reminding the NPCC that we have suggested on a number of occasions that simply surveying HR departments for a view, without knowing who is actually providing data, nor to what extent they are informed about the issues at hand, is not a method we would recommend. Nonetheless, we tried to offer constructive comments should the NPCC decide to pursue this method. We stated clearly though that we would not, be supportive of this as being an adequate method, and we asked that this be discussed further perhaps at a Technical Working Group of the PCF (given that the PCF's Terms of Reference include the agreement of data for the PRRB).
- Having seen the questions the NPCC proposed, we asked that, rather than asking for subjective views on the amount, the review should assess whether the allowance is actually getting the right people in the right place at the right time. We wanted quantitative evidence regarding under what circumstances the allowance becomes necessary; whether the amount is sufficient to get volunteers; whether those who end up doing the work feel it is fair, and so on.
- We also sought to ask whether officers are on call on rest days, annual leave days, free days, etc, and how often - so that we can measure the impact on officers. If the impact is high then we suggested PCF could look at ways to address the issue - eg, measures would differ depending on the reasons. For example, if it is a lack of specialist skills, and so on.
- We also provided detailed comments on the survey questions, including noting that some questions were ambiguous, and how this could be addressed.
- Both the PFEW and PSA separately requested that we could see a final version of any study, as if it was to be used to inform policy we would need to be clear as to how appropriate, robust and valid the questions are. For that reason we welcomed being included at this stage: but said that we believed a much more productive way forward would be to have further input to study design, as unfortunately we believed the current method has significant flaws.

- 5.1.6 Reviewing the survey took considerable time and resource. And yet we were subsequently informed that it had actually been sent out to force contacts (some HR departments, some others) before our comments were received. This despite our sending these to the deadline requested.
- 5.1.7 There was in fact therefore no opportunity for us to influence the data collection.
- 5.1.8 We have subsequently seen finding from the survey, and unfortunately it tells us little that we did not know, or that we find informative. In particular, it yields no objective information regarding what level of allowance is necessary to incentivise behaviours.
- 5.1.9 The NPCC survey tells us only that there is an “appetite to review the value of on call, and for it to be uplifted in line with annual pay awards” – but not for Superintending ranks, who should have it recognised in base pay. We know nothing of who took these views; how well informed they were; on what they based their decision, and so on. For example, what did they mean by “uplifted in line with annual pay awards”? Does that mean from when the allowance was introduced?
- 5.1.10 If, in fact, the allowance were to be uplifted in line with the pay award since introduction it would be worth around £16.30. We question whether this is really a sufficient uplift. If, instead, it was uplifted in line with inflation, (compounded year on year), it would be worth around £17.30. Neither figure comes anywhere close to the on call allowance paid to Police Staff, which is £29.17 per day, negotiated at Police Staff Council.
- 5.1.11 In absence of a review of the allowance amount, as sought by Winsor, the PRRB, and the staff associations, we recommend that officers are paid the same rate as staff members: £29,17 per day. We see no reason for the discrepancy. Further, we believe this should be paid to all ranks.

6 The PRRB standing remit: Recruitment and retention update note

6.1.1 We are conscious that the PRRB has a standing remit to take into account recruitment and retention in its deliberations about pay.

6.1.2 We know that the NPCC view is that there are many applicants per vacancy, and that this indicates that the starting salary must be attractive.

6.2 Recruitment

6.2.1 We therefore wanted to assess the recruitment and early years' retention landscape, in order to ascertain whether it really sheds any light on the attractiveness or otherwise of remuneration levels. Ideally, we need to know the number, and calibre, of applicants that apply for each position, as well as how many are actually recruited. We also want to know whether there is high turnover in the first few years of service, as this tells us a little about whether officers reevaluate their view of whether the remuneration is fair for the role, and whether they continue to believe it is sufficiently attractive, after they start work.

6.2.2 Although we acknowledge that the availability and accessibility of national policing workforce data has improved since the first of our PRRB submissions in 2015, there is still a paucity of clear and accurate figures on a number of key recruitment and retention indicators.

6.2.3 The NPCC ran a Recruitment and Retention Survey between June-July 2017, and reported on the findings in January 2018. But that data only represented 13 out of the 43 police forces, no Welsh forces were included in the survey, and the data is now out-of-date.²⁹

6.2.4 Therefore as in previous years, the PFEW has had to resort to submitting Freedom of Information (FOI) requests in preparation for our PRRB submission. Our requests were designed to find out basic information such as the numbers of vacancies; the ratio of applicants to vacancies; and drop out rates from recruiting.

6.2.5 In particular forces were asked to supply:

- Between January 2018 and November 2018, the total number of the following:
- Officer Vacancies

- Applicants for officer vacancies
- Applicants for officer vacancies who withdrew (dropped out) during the recruitment process
- Successful applicants for officer vacancies (applicants who were offered a position)
- Officer joiners (applicants who were offered and accepted a position)
- Probationers (officers) who have voluntarily resigned whilst still in their probationary period

6.2.6 The aims of collecting these data were to help us better understand and monitor the attractiveness of policing as a job; the efficiency of current recruitment pathways; to identify existing or potential recruitment and retention challenges, and; to help us explore whether the existing pay and conditions ensure the sufficient recruitment and retention of officers to match need.

6.2.7 Given that in our 2015 FOI requests only two forces (from a sample of six) supplied data within the statutory timeframe, this year the PFEW enlisted support of local PFEW Chairs and Secretaries to try and encourage a more timely response to the FOI request within their own Forces and/or source the data themselves from their HR departments.

6.2.8 While 40 out of the 43 police Forces within England and Wales acknowledged receipt of our requests,³⁰ only 24 forces supplied a response to our request via their FOI teams within 20 working days (the current statutory guidelines) from that acknowledgement.

6.2.9 At the time of writing³¹ further 5 forces provided a response via their FOI teams after the statutory deadline (please see table 1 for more details) and 11 forces provided data via their local Chairs and Secretaries, 5 of whom had not already provided data through their FOI teams (please see table 2 for more details).

²⁹ <https://www.npcc.police.uk/Publication/Surveys%20.pdf>

³⁰ by either sending a holding email or their final response to our request

³¹ 29th January 2019

6.2.10 Therefore at the time of writing 32 out of 43 forces have provided basic recruitment and retention data either by their FOI offices or by our local chairs. We do not have any data for the remaining 11 forces.

6.2.11 As with our PRRB submissions in January and December 2016, we note that:

- A third of Forces were unable to supply simple workforce data in response to, and in line with, statutory deadlines (20 days).
- Two forces refused to provide data – both on the grounds that they were unable to retrieve details on internal vacancies so were unable to provide an overall total.
- Several Forces provided incomplete or poor quality data – including one force who provided data for a restricted time period due to an upgrade in their electronic system that made retrieval of data captured prior to the upgrade impossible.
- These data need to be interpreted with some caution, as they are limited. For management purposes, it would be useful to have a standard way of collating such data.³²

³² It may also be important to note that not all Forces follow the traditional pattern of recruitment, whereby applicants respond to a particular recruiting trawl, which made answering the FOI questions more challenging. For example, at least four Forces indicated that they could not answer the question regarding number of vacancies as they have open recruitment drives to create a candidate pool to select from as and when vacancies become available. Additionally, some of the applicants who weren't offered a role in the 12 month period we looked at may be offered a role in the future, so the figures can only really be treated as estimates. However, this type of data are crucial, and it would be sensible to ensure forces collect data using the same definitions and standards regarding accuracy. The College of Policing was previously awarded £500,000 from the Police Transformation Fund to support the development of a new e-recruitment platform. In our December 2016 submission we highlighted that, if implemented effectively, this may provide an opportunity to track candidates, monitor recruitment and promotion trends, and assess the effectiveness of new recruitment strategies.

In addition, the College of Policing have develop and maintained the National SEARCH Assessment Centre, a standardised testing centre that constitutes one of the stages of police recruitment that potential officers must pass to successfully become a police officer. Bearing this in mind, the College of Policing was also sent the same FOI request, which was refused on the basis that they did not hold this data. The Home Office's Crime and Policing Analysis and Insight department were also asked the for the same information, but similar to the College of Policing, indicated that they did not hold this sort of data.

6.2.12 The above suggests that some Forces may still not be using even extremely basic workforce data to make well-informed evidence-based decisions around recruitment and retention issues.

6.2.13 From the data that were returned, the following was noted:

- Whilst there are some forces where the NPCC's narrative is borne out, insofar as there are many applicants for each vacancy, the reasons for this are complex.
- First, we believe some forces have interpreted "applicants" as being anyone who expresses an interest at all, (that is, "information seekers"), whereas others have interpreted this as meaning anyone who goes through the whole application process. (True "applicants"). Forces who use information seekers as a metric will believe that the recruiting pool is vast.
- Recruitment has been very low for a number of years as forces have reduced in size. This means there is a backlog of candidates on which forces are relying. For example, Durham last had a recruitment drive in July 2017, but actually took on a number of officers throughout 2018.
- This has an unintended effect: in some cases officers applied under the old recruitment routes. We have heard of applicants who applied for a Constable role in the expectation that starting salary would be £19,900 or higher, but who were told very late in the process that they were being brought in through the PCDA route (not the one for which they had applied) on £18,000. This means the number of applicants is not a true reflection of the attractiveness of the role.
- The ratio of applicants to vacancies varies massively. In Devon and Cornwall, for example, there were 81 candidates per vacancy. But while that may seem to indicate that recruitment is thriving, it becomes much less reassuring when one considers there were only two vacancies: therefore the data cannot be indicative of a "normal" recruiting situation.
- If we look instead at those forces who needed to fill 100 or more vacancies, we see that the average ratio of applicants to vacancies (applicant to hire ratio) is about 4.7 to 1.³³ This is not an extreme ratio, by comparison to other organisations. It is necessary to have a pool from which to select, and the data tell us nothing about what proportion of applicants were actually suitable.

³³ In calculating the applicant to vacancy ratio, we adjusted for those who dropped out during the process. That is, we only considered those who had not dropped out as true applicants.

Interestingly, the MPS said they had no target number of vacancies, but data shows they took in around 1 in 10 applicants. Given that the MPS has had to drop the residency criteria that it had recently introduced in order to try to maintain enough officers, it would appear that only 1 in 10 applicants was actually suitable, otherwise the MPS would presumably have recruited more.

- Nineteen forces supplied data sufficient for us to calculate what portion of recruits withdrew their applications voluntarily. Over half (11) had a drop out rate of 14% or higher. In TVP the drop out was 40%, suggesting that perhaps TVP supplied data for information seekers rather than applicants. In West Mercia the drop out rate was 32%, and in Norfolk and West Yorkshire it was about one quarter.
- With regard to retention during the probation period, we asked each force how many probationers dropped out in the first two years. Clearly these leavers were not all from the pool of recruits that we asked about (that covered one year only), so to calculate drop out rates we assumed recruiting had been steady over two years. In Derby, 5 officers left within 2 years. Only 4 were recruited in 2018, so if we assume the same number were recruited in 2017 this represents a drop out rate of 62%. Similarly, in Bedfordshire 23 left in the first two years, equal to a drop out rate of 24%; in Dorset 9 left, equal to a 28% drop out; in South Yorkshire it was 15% (all assuming recruiting was steady over two years).
- Many of these applicants applied before the starting salary was reduced to £18,000, and the requirement to either gain a degree as a PCDA, or to have a degree, was put in place. We cannot yet say for certain what the impact of this will be, but it is well recognised that the requirement to have a degree in nursing had to initially be propped up by ensuring there was a bursary in place. Since the bursary was removed in 2017, applications to study nursing in England have dropped by a third. The government sought to ensure nursing was seen as a profession, implementing a similar scheme to what is now being done in policing. “But half a decade later the NHS is trying to fill a record 34,000 full-time nursing and midwifery roles, and the number of registered nurses is shrinking as experienced staff quit because of government pay restraint policies” (The Independent, 5th Feb 2018).the fall in applicants from mature candidates is the most stark.³⁴

³⁴ <https://www.independent.co.uk/news/health/nursing-applications-ucas-course-drop-nhs-grants-undoing-debt-tuition-fees-costs-a8191546.html>

6.3 Recruits

6.3.1 The Home Office collect data regarding the overall numbers recruited to each force, with information about gender and BME status. However, these statistics do not go into detail regarding some issues relevant to protected characteristics (such as caring responsibilities), nor do they gather information about why people join.

6.3.2 PFEW has begun to gather relevant information via a number of surveys. There are some data from these presented in annex 5, and further details are available in our reports.

6.3.3 Our survey data reveals that the demographic profile of recruits (who responded) is as follows:

- The average age of new starters was 28
- 21% said they had caring responsibility for a child or children under 16
- 45% of new starters held a degree or equivalent
- 51% had some form of prior work experience with the police service before becoming an officer
- 28% had come directly from another paid role in the police family, such as PCSO or member of police staff

6.3.4 None of these statistics are currently collected at national level by the Home Office, NPCC, or College of Policing. We believe it is essential to better understand the recruit pool, and to track whether this changes, now that there are three new entry routes to policing.

6.4 Retention

6.4.1 Similarly, we understand that there is a view held by employers that retention is not a significant issue, and that by comparison to other jobs “wastage” from service is low. We understand their argument that this indicates that pay is not, therefore, unduly low, as it is sufficient to retain officers. We disagree.

6.4.2 Voluntary turnover figures must be put in the context that over the last several years officer numbers have reduced by 21,000 since 2010. This is the equivalent of all the officers from the following 12 forces leaving: Devon and Cornwall, Avon and Somerset, Wiltshire, Gloucestershire, Northampton, Warwickshire, West Mercia, Gwent, Dyfed-Powys, Bedfordshire, North Wales, Dorset.

Figure 27: Officer numbers: scale of reduction



6.4.3 It is clear that such a significant drop in numbers could not occur without extensive impacts on those left behind. The loss of experience, and the need for officers who remain to pick up on extra workload, has had impacts on officer wellbeing, morale, fatigue, and stress. These are documented in annex 6. It is somewhat of an understatement to point out that it would add insult to injury to now suggest that officers remaining do not need a substantial pay rise, in recognition of their work, because voluntary turnover is not considered to be high.

6.5 Leavers

6.5.1 Since October 2017 we have surveyed all leavers, nationally.

6.5.2 Between October 2017 and April 2018 there were a total of 598 respondents to

our survey. The sample consisted of 79.2% respondents that identified as male and 20.8% that identified as female. Of this sample the majority (93.8%) were white and 5.3% were Black or other minority ethnicity group (BME). The average age of the sample was 50 years of age, with the highest proportion of the sample (80.4%) between 46-55 years of age and the lowest proportion (0.6%) between 18-25 years of age. The majority of the sample were Constables (62%), 23.1% were Sergeants and 14.9% were Inspecting Ranks. Population comparisons were not made due to the limited reporting of leaver characteristics within the official Home Office statistics. Over time, we intend to track the profile of leavers. In particular we will use these data to establish whether those who leave early differ from those who complete full service careers.

- 6.5.3 Most leavers had access to their full pension (62%). However, when asked for main reasons for leaving, many cited their morale (52.5%), the impact of their job on their family/personal life (43.8%) and the impact of the job on their psychological health (43.3%). Respondents could provide more than one option within reasons for leaving.
- 6.5.4 Only 11% of respondents had no plans to look for another job after leaving the police, however 64.5% would never consider returning to the police.
- 6.5.5 76.2% of respondents thought that the police service had an obligation to a large extent to provide them with up-to-date training and development, whilst 70.6% said that the police service had an obligation to provide fair pay for the responsibilities in their job. However only 14% said that the police service had actually provided them with up-to-date training and development to a large extent, and just 3.5% said that the police service had provided fair pay for the responsibilities for their job.
- 6.5.6 Other obligations that were likely to be under fulfilled by the police service (i.e. the police service provided less than respondents expected) were pay increases to maintain their standard of living (69.4% found this had be under fulfilled), and a benefits package that is comparable to employees doing similar work in other organisations (65.1% found this had been under fulfilled).³⁵

³⁵ PFEW Leavers' Survey Headline Statistics Report, R092/2018, Author N. Wellington.

7 Annex 1 PFEW and PSA letter to the NPCC, Principles and risk log

Police Federation of England and Wales

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23 October 2018

Emma Kent

Programme Manager National Reward Framework

NPCC lead Chief Constable Francis Habgood's Office

Thames Valley Police Thames Valley Police HQ Oxford Road
OX5 2NX

Dear Emma

Thank you for your email dated 2nd October, inviting comments on the design principles and assumptions for the new reward framework, and on the risk log you provided at the last Police Consultative Forum meeting, in September (dated September 2018). We welcome the opportunity to make initial comments on these, as part of an engagement and consultation process that we trust will be given the appropriate time and consideration that is necessary for such wide reaching proposals.

As a general observation regarding the design principles, we note that there are 14 of these. This makes the list rather unwieldy and impractical for the sorts of purposes we believe it might be intended (for example, for communicating overall aims and underlying philosophy). We wondered whether it might be shortened, and perhaps categorised into objectives (what you seek to deliver) and supporting design mechanisms / methods (how you seek to deliver it), as currently the list is a mixture of both. For example, we see "it will deliver a national pay system" as an objective, while "base pay, total cash, and total remuneration will be benchmarked" is a statement of an intention to use a particular method in order to start to deliver the new system (and doesn't actually set out what you intend to achieve by using this method). We hope you find this suggestion helpful.

Design principles

Taking these design principles first, we have categorised these into 4 groups:

- Those overarching principles where we agree your objective, albeit with reservations as to whether the design of the pay system can be made to ensure they are addressed.
- Those specifically related to which elements of job performance will attract pay. Here we understand your principles and reasoning, but have concerns about the objective itself, and furthermore believe there to be practical concerns that make them unfeasible.
- Those that we believe could create contradictions of purpose.
- Those where we seek much greater detail and explanation of the rationale.

Overarching principles

There are some principles with which we agree, seeing these as essential and unarguable objectives. These include the principle to “deliver a national pay structure for all officers (at all ranks)”; the principle to “seek to limit bureaucracy but be robust enough to support evidence based decision making”; and the principle that it “should be sustainable into the long term”. Similarly we believe the principle that it should “support the closure of the gender pay gap” to be an unquestionable requirement.

However, these principles might more accurately be described as objectives or aspirations: and we agree them to the extent that we agree we should collectively seek to achieve them.

Unfortunately, however, even while we agree these, we must raise concerns. It is currently extraordinarily difficult to see how these will be delivered by the current design. There is no map between the principles, the design, and the outcomes. That is, how does the current design support or achieve these principles? In particular, how does it support the closure of the gender gap? Are you able to give any examples of how this design will meet this objective? Do you have data that tests hypotheticals? Can you at least state the underlying theory and assumptions that lead from the design to the outcome?

Arguably the current design, seeking to potentially limit Constable pay to those willing and able to take on specialist roles, would actually have the opposite effect. For example, there may be an impact on carers’ willingness to undertake such roles due to increased need for private study etc. (and more females than males tend to be carers). Further, risk 5 on your risk register states that “moving from a fixed remuneration framework to a framework with more flexibility could compromise compliance with equal opportunities legislation”. You also say that “linking pay to skills could also inadvertently increase the gender pay gap”. In these statements you yourselves are acknowledging that the new framework could actually make the gender pay gap worse. How can you therefore assert that the principle of closing the gender pay gap is being addressed?

Principles related to which elements of job performance will attract pay

We note that at the direction of the Treasury you have included the principle that “it will remove increments based solely on length of service”. We consider increments paid at the end of each year’s service to be rewarding those who are choosing to remain in policing and develop deeper knowledge. We consider time served to be a convenient “dummy” for experience, and a mechanism that minimises bureaucracy, while offering an incentive. We do not believe there is sufficient evidence to prove there is a better or more cost effective way to do this.

You have stated three further principles related to the consideration of elements of job performance that you believe should be linked to pay, seeking “a link between pay and contribution”, and “competence”, and “specialist skills”. We consider there to be some overlap between these concepts – for example between contribution and competence. We question whether these need all be included.

Further, even were we to accept the principle of competence related pay, we have reservations about its inclusion for practical reasons. You are already aware, for example, that the 2018 PEEL report records that only 3 forces were able to demonstrate having conducted performance development reviews (PDRs) for their whole workforce. It is therefore difficult to see how either a link between pay and contribution, or between pay and competence, that is fairly and reliably administered, could be introduced within the timeframes stated for pay reform. You have, yourselves, acknowledged that the failure of forces to implement PDRs is symptomatic of a risk that “forces do not have the required skills, systems, and capacity to implement and maintain the new framework”. (Risk 12, outlined in Paper 3 provided to PCF September 2018). The risk control action you suggest - that this be considered when designing the framework, to ensure it is “bureaucratic light” - may be a reasonable way to proceed: but the evidence you provide in the rest of your paper suggests that you are not actually doing so. Specifically, how can you claim that the design will be “bureaucratic light” if you are simultaneously trying to fulfil objectives of linking pay to contribution, and competence, and skills?

Principles that we believe could create contradictions of purpose.

There are some principles currently included that we believe could be at odds with one another. For example, “there will be a link between pay and specialist skills” may be contradictory to “it will maintain the flexibility to enable deployment of officers to different roles”. Logically it is difficult to see how these two aspirations can both be addressed. At this stage we do not believe your plans are sufficiently developed to demonstrate that both are simultaneously achievable. We look forward to seeing more proof here.

Those where we seek much greater detail and explanation of the rationale

Finally, there are a number of design principles where it is extremely difficult to see what it is that you are seeking to do or to achieve, as no proposals have yet been brought. These include, firstly, the idea that the framework “will provide flexibility

so forces can provide local supplements". What will these supplements be for? In what circumstances will they be used? If skills, competence, and so on are already built into progression pay, what else might supplements be considered for? Secondly, these include the idea that "allowances are consolidated where appropriate". It is difficult to see in what circumstances it might be appropriate to consolidate these. As an example, Away from Home Overnight Allowance incentivises a specific behaviour at a specific time: how would consolidating this continue to meet that end?

With regard to the principle that "it will seek to ensure consistency between staff and officers, where appropriate", again, we would need much more detail to be able to agree to this principle. There are areas where consistency is a sensible objective, and areas where it is not. We note that

this principle is not mentioned in any other documents you have provided, including either your design drafts, or your risk register. From a practical point of view, agreeing the detail of any such design with the staff unions will clearly have to be taken into account. You will be well aware they are not covered by the PRRB or the PCF.

Finally, we refer you to the list of considerations that we stated in the submissions we made to the PRRB in 2014.¹ We believe this would serve as a suitable basis for your design principles: or, at the very least, a useful cross check.

Assumptions

Turning now to your list of assumptions, we must conclude that these raise more questions than they answer.

Assumptions regarding the paybill.

On the one hand, you state that the framework will seek to be cost-neutral and affordable within forces' budgets. On the other, you state that it will inform the Comprehensive Spending Review. You also state that the Home Office model will be used to determine the future impact on the officer pay bill.

We could conclude that the sequencing of these steps will be as follows: the Home Office model will be used to determine costs. Then – even if the costs for the reformed pay system are more than for the current one – provision to cover these additional costs will be sought during the CSR. Once these additional funds are secured, these will be trickled down into force budgets. Finally, use of the framework will be funded in such a way that impact on forces is "cost-neutral" for the force, in the sense that the new paybill, despite costing more, leaves each force with as much of their budget to use for other expenditure as is currently the case. This would mean the paybill is in a sense "cost neutral" for the force, but not for the government. This interpretation is acceptable.

The alternative interpretation is that the framework will be cost neutral for the government. That is, the same amount of money overall will be available: it will merely be distributed differently. Any interaction with the CSR would therefore be assumed to be along the lines that no further funding would be sought. This interpretation is not acceptable. It fails to acknowledge that if the government

seeks to change behaviours on the part of officers, it should incentivise this appropriately.

Can you clarify which interpretation, if either, is correct? What do these assumptions actually mean in practice?

Assumptions regarding transition to the new framework

We seek, as a matter of urgency, clarification over what is meant by “actual base pay for an individual will not reduce when an officer transitions onto the new framework”. What does this mean? By base pay do you mean they will not be placed below their current spine point? (Confusion is caused here by the use in other documents of base pay as being either with or without the X / P factor). We believe officers should not lose any pay on transition. Further, when you state that pay will not reduce, are you giving reassurance that the level of pay will not reduce? We would not anticipate officers being left on a spine point for potentially several years. Would officers’ pay be index linked thereafter?

Further, you state as an assumption that “existing officers will transition to the new framework over time...phased in line with the capacity of the service to accommodate the changes and operational priorities”. We have already noted that forces do not appear to be ready for these changes (as judged by PEEL assessments). It cannot be fair that our members might be prevented from transitioning to the new scheme because of forces’ lack of preparedness. If that occurs, we would not expect our members to suffer financial disadvantage. There will need to be some mechanism to ensure that they do not. Please can you provide your thoughts as to how that will be addressed?

You also state as an assumption that “new recruits will be move (sic) onto the new framework immediately”. From a practical point of view, how do you intend to achieve this? Are you anticipating that there will be two entirely separate sets of Regulations, one for each pay scheme?

With regard to some of the other assumptions listed, we fully support the idea that a detailed work programme should be produced, identifying interdependencies with other programmes of work, including those of the College of Policing that will ultimately underpin pay, and that a communications and engagement strategy will be produced. The staff associations have been seeking this information for some years now, since the outset of the work. We look forward to receiving these.

Risk register

With regard to your risk register, we have some comments that apply to a number of risks. One pressing concern is with regard to the Risk Control Plan. Unfortunately this is currently woefully inadequate. It is simply not acceptable to identify a risk, and then state in the Risk Control Plan “ensure the design mitigates against this risk”. And yet this – or similar wording – is what is stated for risks 5, 16, and 22. The point of the Risk Control Plan should be to offer concrete suggestions to mitigate the risk: not simply to state that this will be addressed, without clarity over how. It would be much better to simply

acknowledge that these risks have not yet been addressed.

The current presentation of the risk register does not allow for proper evaluation of the seriousness of each risk, or the likelihood that the negative consequences can be avoided. As an example, with regard to risk 5, which is that the new framework may compromise compliance with equalities legislation, we believe this is a serious risk with a high likelihood of a negative outcome. To be absolutely clear, this would be a “show stopper” for the staff associations. We simply cannot sign up to any design that carries such high risk of a negative outcome for the most vulnerable of our members.

Risk 14 is another that we find completely unacceptable. You state that “a cost neutral model will mean there will need to be losers to fund the winners” and that “longer serving officers at the top of their pay scale” may need to have a “pay freeze”. This is insupportable. Officers have already suffered years of first pay freeze and then suppression well below inflation. We cannot accept that these same officers might now have to tolerate further pay freeze, whilst newer in service officers – who we assume you would regard to be the “winners” – are able to access increases, and potentially even pass these officers by. You state that “Chief Constables must be prepared to stand behind this and advocate for the change. This will require considerable leadership effort”. This wording is less a risk identification than an instruction: and a risk register is a highly unusual document through which the pay reform team is seeking to direct Chief Constables.

In our view, the most constructive part of this particular risk capture is with regard to what you refer to as the Risk Control Plan, where you state that there may be a need to make a strong case to government as part of the CSR for additional funding, so that morale is not undermined. We believe this to be a necessary and fundamental building block for pay reform. We do not believe the reform can succeed unless this vital step is undertaken.

The following is a brief list of some specific concerns regarding the risks stated in the register:

- Risk 5: the Risk Control Plan is inadequate.
- Risk 14: as stated above, this is unacceptable, both in terms of the way the risk is stated, and in terms of the lack of clarity regarding risk control.
- Risk 16: the Risk Control Plan is inadequate.
- Risk 4: there seems to be a significant gap here. While you refer to the “workforce” as possibly being unsupportive (and while in other risks you refer to the need for the NPCC, Treasury, and Home Office to sign off) you do not capture at any point the risk that staff associations will not sign off on the design.
- Risk 10: you make reference to a Risk Control Action of having the NPCC team draft determinations during implementation planning. We seek reassurance that any determinations will be drafted by suitability skilled Home Office lawyers. Further we seek reassurance that determinations will not be drafted before proper consultation has been undertaken.
- Risk 12: you note that there is a “risk” that forces will not have the

required skills, systems and capacity. You then provide evidence from the PEEL report that that is not in truth a risk, but is a fact. You then provide a Risk Control Action regarding ensuring the framework is not bureaucratic that we believe you have failed to enact thus far. The framework – if it is to support all 14 principles – will almost certainly be bureaucratic. Concerns have been raised in College meetings about the increased bureaucracy of the higher skills model, and PEQF.

- Risk 13: the Risk Control Action you suggest is a measurement of the risk, not a mitigation of it.
- Risks 1 and 2: we believe all parties to the PCF should be considered here.
- Risk 3: this Risk Control Action has been outstanding for some time. In October 2018, this consultation and engagement plan has still not been outlined. We have been provided only with a chart showing these as happening on an ongoing basis. We need to understand what you will present, when, and what provision you are making for consultation.
- Risk 11: You state that by the end of phase 1 you will have an indicative view of force implementation costs. This is a crucial element. We need to understand what you mean by this. There is an opportunity, if this is done properly, to feed it into the CSR. Unfortunately at this stage we are unable to determine whether that is your intention and, if so, whether we could support you, as we would wish.

Our final comment with regard to the risk register is on Risk 15. Here, we believe there is an opportunity for us to work together to give the overall programme a better chance of success, but with reconsidered objectives.

The risk stated is that “the current programme timeline is unrealistic”. You note the PRRB have raised concerns about this. In fact, the PRRB suggested you prioritise which change is needed. Your Risk Control Action suggests you will do that: “consider focusing on the areas that provide clear identifiable benefits as recommended by the PRRB”.

We believe this task is essential. Without undertaking this we are concerned that the reform will fail, either because it is too ambitious, and elements are impractical, or because the lack of a clear theory of change underpinning it will mean there are unintended and uncontrolled consequences. We would very much welcome the opportunity to work with you on the prioritisation of elements, and seek to see that as an agenda item at the PCF as soon as possible.

Yours sincerely



ALEX DUNCAN NATIONAL SECRETARY



DAN MURPHY NATIONAL SECRETARY, PSA

cc: Francis Habgood, NPCC

David Lebrecht, Chair PRRB (c/o

OME, Gabrielle Kann) Angela

Chadha, Home Office

ⁱWe believe the new pay system should reflect a number of considerations:

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

8 Annex 2 NPCC response to PFEW and PSA letter, and staff association response

NPCC response to the POLFED/PSA letter dated 23rd October on the 'Pay Reform Principles and Risk Log'

NPCC response provided on the 3rd December 2018

| Item No | Page No | Summary of the POLFED/ PSA comment | NPCC response | Action taken | Staff Association response |
|--------------------------|---------|---|---|--|---|
| Design Principles | | | | | |
| 1 | 1 | We note that there are 14 of these. This makes the list rather unwieldy and impractical for the sorts of purposes we believe it might be intended. We wondered whether it might be shortened and perhaps categorised into objectives (what you seek to deliver) and supporting design mechanisms/ methods (how you seek to deliver it) as currently this list is a mixture of both. | <ul style="list-style-type: none"> The design principles are currently intended as an internal guide only, to be referred to when developing the design and making decisions - they are not intended as a communication tool (in this format). They have been developed over the past 24 months and discussed at different times at the Chief Constables Council and with staff associations. They are intended as a living list to be reviewed periodically. Some amendments have been made as a result of feedback from staff associations. For communication purposes we accept the list is unwieldy and impractical. For these purposes the list will be reviewed and refined The revised list will be circulated for discussion at a future PCF meeting | To review and update the list - so it can be used for communication purposes. To be addressed in Feb/ March 19 | Our comments were not intended to reflect the principles' suitability for communication purposes only, which seems to be the way the NPCC has now interpreted them. Rather the comments are about the principles' suitability as a design tool. (Which is indeed what the NPCC response says they are used for). We continue to have strong reservations about these principles. We do not believe a review "so it can be used for communication purposes" is sufficient. This does not address the crux of the matter, which is that the design principles are fundamental: all else flows from these. They should not, therefore, be left in a state where weaknesses are recognised, but not yet addressed (as implied by the response) because to do so leaves the danger that the design will be |

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| | | | | | poor. |
| 2 | 2 | These principles might more accurately be described as objectives or aspirations and we agree them to the extent that we should collectively seek to achieve them. | <ul style="list-style-type: none"> We are pleased to note we agree we should collectively seek to achieve the design principles The description of the design principles will be reconsidered when reviewing the principles | To review the description when reviewing the principles in Feb/March 19 | |
| 3 | 2 | There is no map between the principles, the design and the outcomes. How does the current design support or achieve these principles? In particular how does it support the closure of the gender pay gap? Can you at least state the underlying theory and assumptions that lead the design to the outcome | <ul style="list-style-type: none"> This is still work in progress, we will seek to produce this in phase 2 of the project It is intended for the design principles to form part of the acceptance criteria of the project. For this we will need to produce evidence to demonstrate how they have been met and if not why not An equality impact assessment will also be completed for each of the work streams and the overarching design (in support of the College of Policing EIA's) - this will explore the closure of the gender pay gap in further detail. | To look at this in phase 2 of the project | <p>Again, this would seem to be inappropriate. Either the design principles have been designed with an outcome in mind (and an underpinning theory of change that legitimises that principle) or they have not. The NPCC response suggest a post hoc reaction to this. i.e., "we'll see if this might lead to what we want, and if it does, we will claim that as our intended outcome".</p> <p>Two issues need to be addressed: What is it you are aiming to achieve? How do the principles support this?</p> |
| 4 | 2 | The current design seeking to potentially limit constable pay to those willing and able to take on specialist roles would actually have the opposite effect (in relation to gender pay gap). Related to this is risk 5 – that moving from a fixed | <ul style="list-style-type: none"> It is not our intention to limit constable pay As above an equality impact assessment will be completed for each of the work streams and the overarching design (in support of the College of Policing EIA's) - this will explore the impact on the | To look at this in phase 2 of the project | It is reassuring that the NPCC state that pay will not be limited. Can we confirm that the NPCC response here means that everyone, regardless of role, will have equal access to pay? |

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| | | remuneration framework to a framework with more flexibility could compromise compliance with equal opportunities legislation and linking pay to skills could increase the gender pay gap. | gender pay gap in further detail. | | |
| 5 | 2/3 | We note that at the direction of the Treasury you have included 'it will remove increments based solely on length of service'. We consider increments as a way of rewarding those who are choosing to remain in policing and develop a deeper knowledge. We do not believe there is sufficient evidence to prove there is a better or more cost effective way to do this. | <ul style="list-style-type: none"> • This is noted • However, the general move across all sectors is to remove increments based solely on length of service. Introducing links between competence, skills and contribution will also negate the option of a further link with time served. You accept the principle of competence related pay. • The NPCC also agree the service cannot continue with the current pay point structure, police reward needs to be modernised to deliver Workforce Transformation in support of the Policing vision 2025 | No specific action required | <p>As previous comment – we understand that the NPCC is stating that “police reward needs to be modernised to deliver Workforce Transformation”. However, there is no link in your documents between the change you suggest, and the outcomes you want to achieve.</p> <p>How do you believe that changing pay in the ways you suggest will deliver Workforce Transformation? What is the theory of change?</p> |
| 6 | 3 | You have stated 3 further principles related to the consideration of elements of job performance that you believe should be linked to pay seeking 'link between pay and contribution and competence and specialist skills'. We | <ul style="list-style-type: none"> • Agreed, this will be considered when reviewing the principles | To be reviewed when reviewing the design principles in Feb/March 2019 | See comment at the top of the page. |

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| | | consider there to be some overlap between these concepts – do they all need to be included? | | | |
| 7 | 3 | We accept the principle of competence related pay, but we have reservations about its inclusion. It is difficult to see how either a link between pay and contribution or between pay and competence that is fairly and reliably administered could be introduced within the timeframes stated for pay reform. You have already stated in risk 12 that forces do not have the required skills, systems and capacity to implement and maintain the new framework. The risk control action may be a reasonable way to proceed (to ensure it is bureaucratic light), but the evidence you provide in the rest of your paper suggests you are not actually doing so. How can you claim that the design will be bureaucratic light if you are also trying to fulfil objectives of linking pay to contribution and competence and skills? | <ul style="list-style-type: none"> • This is part of the enabling change being delivered by the College of Policing. They are responsible for supporting forces in the PDR process (and as part of this assessing competence). This work is ongoing. • We are in discussions with them to identify what enabling change needs to be in place prior to the launch of the framework. The prioritisation of the 4 CoP strands of work are key to this. We will be able to provide a further update on this in 2019 as we develop a detailed implementation plan. | To provide an update in early 2019 on the enabling change being delivered by the CoP | Our understanding is that the CoP are saying they cannot enforce a PDR system. |

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| 8 | 3 | <p>A link between pay and specialist skills may be contradictory to 'it will maintain the flexibility to enable deployment of officers to different roles'. Logically it is difficult to see how these two aspirations can both be addressed. At this stage we do not believe your plans are sufficiently developed to demonstrate that both are simultaneously achievable. We look forward to seeing more proof here.</p> | <ul style="list-style-type: none"> We accept the point that our plans are not sufficiently developed - we intend to look for more proof to evidence this as part of the work on variable pay. However we do already have a link between allowances and specialist skills now in the form of targeted bonus payments. | <p>To be considered in phase 2 of the project</p> | <p>We accept that you intend to “look for more proof to evidence this”. There is a need, however, to look not only for evidence which supports your existing direction of travel, but for also for evidence that might disprove your assumptions, or that suggests unintended consequences.</p> <p>Overall, there is a real need to develop some proper studies to provide a decent theoretical and evidence based body of proof for this work. This should include testing for negative change as well as positive. It should include theoretical justification – perhaps based on what is has been proven in other relevant organisations – and it should include tracking of change once it is enacted, to check that the outcomes that are sought are actually happening. There should also be cost benefit analysis.</p> <p>As yet we have seen no plans for this.</p> |
| 9 | 3 | <p>The idea that the framework will provide flexibility so forces can provide local supplements – it is difficult to see what it is</p> | <ul style="list-style-type: none"> This will be considered more in 2019 (phase 2 of the project) and as part of the review of targeted bonus payments. | <p>To be developed in phase 2 of the project</p> | <p>We do not believe that it is necessary to have considered / developed these in order to answer our fundamental question, which is</p> |

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| | | that you are seeking to do or achieve as no proposals have yet been brought. In what circumstances will they be used? If skills, competence and so on are already built into progression pay, what else might supplements be considered for? Secondly these include the idea that allowances are consolidated where appropriate. It is difficult to see in what circumstances it might be appropriate to do this. | <ul style="list-style-type: none"> We accept we are operating in a difficult environment and until forces receive more funding they may choose not to use local supplements | | <p>“What are you seeking to achieve here?” As mentioned, skills and competence are already being addressed, so what is the purpose of further force flexibility?</p> <p>In the absence of a candid answer from the NPCC, this would seem to suggest that local supplements might be based purely on local affordability. That is, affluent areas where the precept can be raised might pay officers more. We have grave concerns about this.</p> |
| 10 | 3/4 | With regard to the principle it will seek to ensure consistency between staff and officers – again we would need more detail to be able to agree to this principle. We note this principle is not referred to in any other documents you have provided. From a practical view , agreeing the detail of any such design with the staff unions will clearly have to be taken into account – they are not covered by the PRRB or the PCF | <ul style="list-style-type: none"> Agreed, we intend to create a separate work strand on this in phase 2, which will define how we do this and evidence it The PABEW are updated on progress periodically and meetings are planned with the Head of the Staff Union to provide a more detailed overview. Police Staff Council has also received an update about police officer pay reform. | To create a new work strand in phase 2 of the project | <p>In the interests of transparency it would be useful to have sight of any written briefing to the Police Staff Council.</p> <p>Can you please clarify who is meant by “the Head of the Staff Union”? Our understanding is there are several staff unions who would feel they have sufficient members to be included.</p> |
| 11 | 4 | We refer you to the list of considerations that we stated | <ul style="list-style-type: none"> Noted we will cross check against these | To cross check against these | |

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| | | in the submission we made to the PRRB in 2014 – we believe this would serve as a suitable basis for your design principles or at the very least a useful cross check | | | |
| Assumptions | | | | | |
| 12 | 4 | <p>On the one hand you state that the framework will seek to be cost neutral and affordable within forces budgets. On the other hand you state that it will inform the CSR. You also state that the HO model will be used to determine the future impact on the pay bill.</p> <p>Their interpretation is the HO model will be used to determine costs, then if the costs are more than the current one, provision to cover these additional costs will be sought during the CSR. Once secured, they will trickle down into force budgets. Use of the framework will be funded in such a way that impact on forces is cost neutral, the pay bill is cost neutral for the force but not the government – this interpretation is acceptable.</p> | <ul style="list-style-type: none"> • There is a reality about police budgets. We will need to put in a business case if there are any additional funding requirements for a new pay framework – either in the short or long term. The opportunity for this will be as part of the CSR process. However, without any additional funding then we will have to live within existing budgets. The HO model will assist in determining what impact the new reward model will have on the national pay bill. Based on this, if additional funding is required it will be included in the CSR. • If additional funding is not forthcoming the NPCC may need to reconsider implementation • NB; this is separate to force implementation costs | No specific action required | We are asking what the NPCC intention is. Is it to put in a case for extra funding to the CSR? If so, how will this be calculated? |

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| | | The alternative interpretation is that it will be cost neutral for the government. This interpretation is not acceptable. If the government seeks to change behaviours on the parts of officers it should incentivise this appropriately. | | | |
| 13 | 4/5 | As a matter of urgency we seek clarification over what is meant by 'actual base pay of an individual will not reduce when an officer transitions onto the new framework'. Confusion is caused here by the use in other documents of base pay as being either with or without the X/P factor. We believe officers should not lose any pay on transition. We would not anticipate officers being left on a spine point for potentially several years. Would officers pay be index linked thereafter? | <ul style="list-style-type: none"> • We agree officers should not lose any pay on transition. They will remain on their current pay point at the point of transition, i.e. if an officer is paid £39,500, they will not be paid any less than £39,500 when they transition. • In terms of being left on a spine point for several years, this will be informed by our approach to transition, which has yet to be defined. The transition approach will be explored and developed in phase 2 of the project | To consider the latter points when developing the transition approach in phase 2 of the project | We must reiterate that officers must not be left on a spine point for a long period. This is manifestly unfair. |
| 14 | 5 | Transition will be phased based on the capacity of the service to accommodate the changes and operational priorities. Concern re lack of forces preparedness. It cannot be fair that out members might be | <ul style="list-style-type: none"> • We will be working with the College of Policing to identify the enabling change and what needs to be in place prior to launch and transition. • We will also be working with the College to ascertain which forces need more support | To explore transition with the PCF in phase 2 of the project | The NPCC's response does not address our concerns. |

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| | | prevented from transitioning to the new scheme because of forces lack of preparedness – please can you provide your thoughts in how this will be addressed | <ul style="list-style-type: none"> Transition will be explored further with the PCF in phase 2 of the project but is likely to take place up to 2025. | | |
| 15 | 5 | New recruits will move onto the new framework immediately - from a practical point of view how do you intend to achieve this? Are you anticipating that there will be two separate regulations, one for each pay scheme? | <ul style="list-style-type: none"> There will need to be different determinations running for different cohorts. Consideration will need to be given to how these are merged We already have this with new apprentices starting on a new salary range. On the launch date the framework will become effective for all new recruits. Existing officers will continue to operate within the current way of operating and transition to the new one over time (in line with the agreed approach to transition). This occurred during implementation of the Winsor reviews. | To explore transition with the PCF in phase 2 of the project | <p>As a point of accuracy, we do not (2nd Jan 2019) have different determinations for apprentices on a “new salary range”. The starting salary determination has not yet been published, following consultation. The progression has not been agreed, and may not differ to existing officers. The PRRB will reserve the right to make that decision, and has not yet been offered suggestions for a progression scale. Indeed, the PRRB have currently agreed that apprentices go on the same salary scale as others, after the start point. It would be inappropriate for the NPCC to state otherwise</p> <p>Any transition following Winsor’s review was based on discussion with the staff associations, and an agreed approach to incremental progression that ensured certain principles were adhered to (eg no “leapfrogging”). Can the NPCC</p> |

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| | | | | | reassure the staff associations that the appropriate level of checking will be done, as previously, when the Home Office and staff associations worked through the issues? |
| 16 | 5 | We fully support a detailed work plan being produced, identifying interdependencies, including those of the CoP that underpin pay and a communications strategy and plan. This has been requested for some time – we look forward to receiving it. | <ul style="list-style-type: none"> • Noted, this continues to be developed with the College of Policing. • A communications resource has now been recruited to the team, responsible for producing the communications strategy and plan • A project charter has been produced and will be shared with PCF members in due course | To share the documents as soon as possible | The plan has been requested since the project inception, approximately three years ago. Unfortunately it would appear that this will not be shared before this year's PRRB submissions. This is extremely disappointing |
| Risks | | | | | |
| 17 | 5 | The risk control plan is inadequate for a number of risks - cannot refer to 'ensure the design mitigates against this risk' – should offer concrete suggestions to mitigate the risk | <ul style="list-style-type: none"> • Noted – the risk log is work in progress and all views are welcome in the development of it. Where we refer to the design being a mitigation, we will provide more detail in terms of specifics | Where the wording 'ensure the design mitigates against the risk' is used, further detail will be provided | It would be useful to know when these updates will be provided. It would appear that these will not be in time for the PRRB submissions |
| 18 | 5 | The risk register does not allow for proper evaluation of the seriousness of each risk or the likelihood that the negative consequences can be avoided. EG risk 5 that the new framework may compromise compliance with equalities | <ul style="list-style-type: none"> • This is a Thames Valley Police risk log format, but we welcome other presentational formats. • The risk scoring is based on a matrix – at the time of sharing this document the risk score had not been reviewed by the programme board, this has now been done. | <p>POLFED/PSA to share other risk log formats with the NPCC.</p> <p>POLFED/PSA to assess the risk using the matrix - the average score from all</p> | <p>We understand that the assessment used is of Likelihood and Impact. Our concern is not with the format, but with the application. We do not agree the assessments provided</p> <p>We will assess the risks as suggested, but we do not agree that</p> |

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| | | <p>legislation – we believe this is a serious risk with a high likelihood for a negative outcome. This would be a show stopper – we cannot sign up to any design that carried such a high risk of a negative outcome.</p> | <ul style="list-style-type: none"> • Going forward (for existing and new risks) our suggestion is to seek views from key stakeholders on their interpretation of the risk score using the matrix – this will help ensure the serious of the risk in terms of likelihood and impact is reflective of all stakeholders • Risk 5 comment noted. | <p>stakeholders will then be used. To be done in early 2019</p> | <p>it would be acceptable to take an “average” risk score, as there is danger that the scores could be distorted and something that one or other party believes is critical might be discounted purely because the other parties had chosen to rate it as low likelihood and or impact. We suggest that further discussion is needed to reach consensus, rather than using an arithmetic mean score</p> |
| 19 | 5/6 | <p>Risk 14 – a cost neutral model will mean there will need to be winners and losers to fund the winners and that longer serving officers at the top of their pay scale may need to have a pay freeze – this is unsupportable. The wording ‘chief constables must stand behind this’ – this is an instruction and a highly unusual document through which the pay reform team is seeking to direct chief officers. The point where we state that we may need to make a strong case to government as part of the CSR for additional funding is a necessary and fundamental building block for pay reform –</p> | <ul style="list-style-type: none"> • This wording ‘winner and losers’ and the comment re Chief Constables was taken from MET comments received after a Chief Constables Council meeting. This was discussed at a previous PCF meeting and the wording has since changed. • Noted re CSR comments – the Home Office modelling will assist in determining if we need additional funding. If we do and funding isn’t forthcoming the NPCC will need to decide if they proceed with implementation. | <p>This wording has since changed</p> | <p>As comment above re funding</p> |

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| | | we do not believe the reform can succeed unless this vital step is taken | | | |
| 20 | 6 | Risk 5, 16 – need to improve the risk control plan | <ul style="list-style-type: none"> Noted will provide further detail and clarity | To update the risk | |
| 21 | 6 | Risk 4- you do not capture that staff associations will not sign off on the design | <ul style="list-style-type: none"> Noted – this will be included | To update the risk | |
| 22 | 6 | Risk 10 – you state that determinations will be drafted during implementation planning by reward team members (to assist the HO process). We seek reassurance that this will be done by suitably skilled HO lawyers. Further we seek reassurance they will not be drafted before proper consultation has been undertaken | <ul style="list-style-type: none"> A Home Office lawyer will not be provided until the initiation of the determination process. At this point the determinations will be completed by a skilled lawyer and subject to consultation. This is in line with current practice and this will not change However, in support of this process the NPCC are seeking to draft the required information as much as possible, using a skilled individual. This is intended to initiate discussion with PCF members and reach as much consensus as possible. This will be completed as part of continuous engagement. | Update the risk to clarify this point | We will provide comments into the Home Office review of the PCF regarding the process |
| 23 | 6 | Risk 12 – there is a risk that forces will not have the required skills, systems and capacity. You then provide evidence from the PEEL report that this is not in truth a risk, but a fact. | <ul style="list-style-type: none"> This is a truth now (for some forces), but there is enabling support being implemented by the College of Policing to address this. Our intention is to identify what enabling change is required ahead of the implementation of the | No specific action required | We believe it would be worth having clarity over the owners of each risk. There are a few where you have alluded to College of Policing work as being crucial in ensuring the risk is mitigated. However, the College are not |

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| | | You have a mitigating action to ensure the framework is not bureaucratic – we believe you have failed this thus far, if the framework is to support all 14 principles it almost certainly will be bureaucratic | <p>reward framework and identify those forces that require more support than others.</p> <ul style="list-style-type: none"> • With regards to the framework, during phase 2 work streams will be established for different business areas, e.g. Payroll and HR, intended to ascertain the impact of the change and what needs to be done or put in place to facilitate the changes. • We accept your point about being bureaucratic - we are working with the College to ensure this is not the case | | shown on the Risk log as owners: rather the NPCC / CC Habgood is. Who is ultimately responsible for the College work being fit for the pay reform process? |
| 24 | 6 | Risk 13 – the risk control action you suggest is a measurement of the risk, not a mitigation of it | <ul style="list-style-type: none"> • Noted – will review this | To review the risk | |
| 25 | 6 | Risks 1 & 2 – we believe all parties to the PCF should be considered here | <ul style="list-style-type: none"> • Noted – will amend | To amend the risk | We will also feed this into the Home Office review of the PCF |
| 26 | 6 | Risk 3 – Risk control action has been outstanding for some time – in October 2018 this consultation and engagement plan has still not be outlined – we need to understand what you will present, when and what provision you are making for consultation | <ul style="list-style-type: none"> • We have sought to address this concern by defining our approach to consultation and engagement. This was shared with you for your informal views - this is ongoing. | Await informal views from POLFED/PSA | We have provided views in the PCF, and hopefully the minutes will reflect these. Unfortunately the consultation document provided is not particularly helpful, as, for example, the terminology is incorrect and confused. We are hopeful that the Home Office review of the PCF will be helpful here, and suggest that the risk |

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| | | | | | register is updated to reflect that that review is occurring |
| 27 | 6 | Risk 11 – you state that by the end of phase 1 you will have an indicative view on implementation costs – this is crucial. We need to understand what you mean by this. There is an opportunity to feed this into the CSR. We would like to support us in this | <ul style="list-style-type: none"> • We welcome your support • To clarify, implementation costs for this project refer to the one off costs to implement the change. The cost for each force will vary depending on their level of readiness. • Implementation costs will not be fed into the CSR as it does not consider one off costs, only ongoing costs • During phase 1 the project will be defining the requirements for change, in other words what forces need to have in place to support the new framework, including PDR system, payroll changes etc. Some of this change is already being delivered or is planned to be delivered as enabling change by the College. We will identify what change is being delivered by the College, what change forces need to make and what the central team is doing. • We want to provide this information as soon as possible so forces can budget accordingly • If we can we will provide indicative costs, i.e. the cost of implementing | No specific action. We welcome any support in identifying the force implementation impact | Unfortunately the NPCC response does not provide much reassurance. On the one hand, you say “we want to provide this information as soon as possible so forces can budget accordingly” and on the other “It will be up to each force to determine the exact cost and ensure they have the right funding in place”. Our concern is that forces will not have the required information to budget accordingly, and that the entire system will fail as it becomes unaffordable. Money spent thus far will therefore be wasted. There is a need for the NPCC to be accountable to the public for the spend on this pay reform project, and we believe that includes providing an adequate calculation of likely costs that can be fed into the CSR on behalf of all forces |

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| | | | <p>a new PDR system. However, it is now likely this will be done in phase 2.</p> <ul style="list-style-type: none"> • It will be up to each force to determine the exact cost and ensure they have the right funding in place • In terms of ongoing revenue costs, we will be completing a business case in phase 2 for a central team to exist beyond the life of the project | | |
| 28 | 7 | <p>Risk 15 – we believe there is an opportunity for us to work together, to give the project a better chance of success but with reconsidered objectives. The risk refers to ‘current programme timeline is unrealistic’, the PRRB have raised these concerns and they have suggested prioritising which change is needed, by focusing on the areas that provide clear identifiable benefits.</p> <p>We believe this is essential. Without this we are concerned reform will fail. We welcome the opportunity to work with you on the prioritisation of elements and seek to see that</p> | <ul style="list-style-type: none"> • The project is now better able to explain the delivery approach and the corresponding timeline. This is detailed in the project charter. The PRRB comments will be addressed in the next submission • The Framework begun being developed in late 2016 and will not be signed off until early 2020. Continuous engagement will be ongoing throughout this period. The NPCC will also not agree to launch the framework until they believe the service is ready. It is expected that transition will then take place over a number of years • Elements of the framework are also being implemented ahead of the launch to minimise impact - the pay for new recruits • We welcome your input into this | To discuss the timeline at a future PCF meeting | <p>Unfortunately the response from the NPCC does not address the key points made, regarding prioritisation. It is not clear whether our point was not understood, or whether the NPCC have purposely chosen not to discuss prioritisation.</p> <p>We respectfully request clarification over whether the NPCC is willing to address the issue of prioritisation, as strongly recommended by the PRRB</p> <p>Finally, it is disappointing to see the following two completely contradictory points made in the NPCC response to point 28: <i>“The NPCC will also not agree to launch the framework until they believe the service is ready”</i></p> |

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| | | this is an agenda item at the PCF ASAP | and now that we are better able to articulate the plan we welcome further discussion on this | | <i>“elements of the framework are also being implemented ahead of the launch”.</i> If the intention was to give reassurance that proper consideration would be given to the changes and their impacts, then unfortunately these two statements undermine that intent |
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9 Annex 3 PFEW and PSDA letter re the PCF process

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17 January 2019

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Dear Angela,

- **RE: Future role of the Police Consultative Forum (PCF)**

Thank you very much for your email dated 19 December 2018, which informed us that the Home Office is to undertake a review of the PCF in consultation with all members.

As you will be aware PFEW has had concerns for some time regarding the way in which the PCF operates; and, in particular, the lack of progress reached on a wide range of topics which have remained on the agenda for a number of years without reaching fruition.

PFEW has previously raised these concerns in our submissions to the Police Remuneration Review Body (PRRB) and recently the PCF has instigated its own internal initial discussions in this regard. I therefore welcome the decision to undertake a formal review at this time and hope that the comments below are helpful in advance of our more detailed discussions both within and outside of the forthcoming PCF meeting.

In the following document we make a case for ten remedies. These are numbered. We reserve the right to add to these during discussions.

- **Background:**

As you know, prior to the creation of a pay review body, police officer pay and conditions were dealt with via a negotiating body. Following the Oaksey report, in 1949, a police Council (with associated arbitration) was created, along with a Police Advisory Board (PAB). In 1980 the Police Negotiating Board (PNB) was formed by act of parliament.

In 2012, Tom Winsor recommended (Winsor review, recommendation 115) that the PNB should be abolished and replaced by an independent police officer pay review body by late 2014. The review body would provide independent recommendations on pay and allowances of police officers in England and Wales. However, a number of essential functions of the PNB – aside from formal negotiation – were missing from this new way of working. For example, there was no direct mechanism for staff associations to raise new issues for discussion and/or agreement, and there would be no facility for the resolution of local disputes regarding the interpretation of regulations or determinations, and PNB agreements. There was therefore a need for a new body to supplement the work of the PRRB, and it was left to the constituent members of PNB to discuss and agree the way forward in this respect. This led to the creation of the Police Consultative Forum.

- **General comments**

As you know, the PCF is a voluntary body, set up to provide a Forum for representative bodies of police employers and police officers to meet outside the Police Remuneration Review Body (PRRB) to discuss pay and conditions related matters.

The Forum is not a negotiating body, nor does it have the powers, status, remit or responsibilities of the now defunct PNB. However, it attempts to fulfill some of the necessary functions that were left vacant after the PNB was disbanded and the PRRB set up.

PFEW noted in its 2016 submission to the PRRB, in relation to discussions on the Away from Home Overnight Allowance, that:

“We do appreciate there has been a transition of responsibilities from the Home Office to the NPCC on a number of issues and that there may be some difficulties in terms of resourcing. However, we are concerned that the PCF is not yet operating to its fullest potential and we hope that in the future the Forum can be used more effectively, to resolve issues such as this.”

Although a few years have passed since then, unfortunately these comments are still valid.

The PRRB has been supportive of the PCF in its reports. In 2015 the PRRB welcomed the creation of the Forum and hoped that it would provide a quick route to achieving necessary changes in police officers’ terms and conditions. In addition, it anticipated that the Forum would enable the parties to

share positions and priorities, prior to submission of written evidence. The PRRB hoped this would support its own process, and help develop a commonly understood evidence-base.

The report, published 2017-18, emphasised, again, support for the principle of engagement and it makes clear, in many places, the wish to see matters being discussed at the Police Consultative Forum.

- **Case studies and difficulties**

PCF meetings have taken place throughout 2015, 16, 17 and 18; the staff associations' key representatives (the National Secretaries) or delegated authorities (Deputies) have attended all. On a number of occasions the NPCC lead has either not been present in the room, dialing in instead, or has not been present. The NPCC lead on pay and conditions does not seem to have a deputy with the authority to represent the NPCC view on pay and conditions, so when he has not attended the pay reform team have done so instead. However, they have not been delegated the authority to take any substantive decisions, nor are they aware of the detail of the existing pay system, and many of the issues arising (e.g. Requests for Guidance). Progress on a number of issues has been slow. Several items have remained on the agenda for all of the meetings to date, without any real resolution to speak of.

Case study 1: Children and Families Act 2014 (CFA)

An agreement was reached on the application of the CFA for police officers at one of the last PNB meetings in 2014. The PNB circular stated that: "The precise detail of implementation and the consequences of that on the drafting of appropriate Regulations and Determinations will be considered by the newly established Police Consultative Forum... [who will] make recommendations to the Secretary of State for the Home Department..." PFEW sought discussions in respect of this detail at the PCF but no progress was made in 2014 or 2015. In 2015 the PCF subsequently wrote to the Home Office asking that determinations be drafted on the basis of the statutory provisions in the CFA. At that time the Home Office sought further guidance from employers and so the matter once again returned to the PCF agenda.

Unfortunately, again, no progress was made at the PCF. Indeed PFEW wrote several letters to the NPCC for discussion at PCF with regards to those aspects of the CFA which should be considered, and suggestions for progress, but no substantive discussions took place on what such guidance might look like. It wasn't until 2017 that the Home Office indicated it would look again at drafting determinations. This has effectively had to be done without the PCF discussions and agreement taking place. This process is still on-going to date.

The impact has been that the Home Office has effectively been given no more clarity over the detail of the regulations than was available at the start of the PCF. Each of the constituent parties will be separately included in the formal consultations, which will be more time consuming and costly for all.

Case study 2: Requests for Guidance (RfGs)

The process for the resolution of local disputes and interpretation of Regulations/determinations and PNB agreements was taken on by the PCF (from the PNB) and is detailed in the Terms of Reference (ToRs). However, only a small number of RfGs have been received and this may well be because the PCF has not managed to give any formal advice on guidance in response to requests for such advice. Two RfGs are currently under consideration by the Forum, but they have sat on the agenda for two years. In fact the only formal response that has been sent out by the PCF is to one RfG where unfortunately agreement could not be reached. If swifter progress could be achieved this could be a valuable resource for the resolution of local disputes, and could potentially help prevent legal challenges.

The impact of these delays is that unfortunately resolution by legal recourse may become necessary. This causes reputational damage, and is costly to the staff associations (in the first instance). Further, the impact on individual members is significant, in terms of wellbeing as well as financial costs.

Suggested remedies:

- 1) It would be helpful if the NPCC lead were able to ensure a deputy with appropriate information and delegations to reach agreement was in attendance, should he be unable to attend in person.
- 2) The PCF needs, as a bare minimum, a suitable and independent secretariat, able to draft documents for circulation and discussion. This needs to be someone with the appropriate skills and experience, including a background in drafting of proposals, guidance, and circulars.

Case study 3: Royal and Special Protection Officers

In keeping with the agreed process, this issue was brought to the PCF for resolution and was delegated to a technical working group (TWG) to consider a proposal from the Metropolitan Police Service for a new protection allowance for RaSP officers. The process should then be that, the TWG having worked through the detail, the members of the PCF (that is, those members agreed in the Terms of Reference) would undertake a check, and ratify the agreement. If not able to ratify it, it would go back to the TWG for further work.

Discussions took place in the TWG and, although progress was probably slower than originally anticipated, matters did move forwards and a business case was agreed by the TWG to be brought back to the PCF at the last couple of meetings.

However, at the last PCF meeting (December 2018) where agreement could, we had hoped, have been reached on the business proposal, by the appropriate individuals (that is the nominated leads from the APCC, and NPCC, and the National Secretaries from the staff associations) progress was halted because of interventions from outside of the PCF agreed process. There have, in recent times, been

differences of opinion at the Forum with regards to membership, which have been outside of the specific detail in the ToRs. In this case, a member of the Metropolitan Police HR team was present, not a member of the meeting as defined in the ToRs, who said the meeting proposal would have to go to the Metropolitan Police management board. It is worth noting that this is a national meeting and no other individual forces are represented. Our understanding is that the Metropolitan HR representative has been present at the invitation of the NPCC lead.

In this case, it is hugely frustrating that the Metropolitan HR team did not seem to realise that their own representatives at the TWG believed they had the delegated authority to reach agreement. It is further frustrating that an invited guest was able to essentially amend the PCF process “on the hoof”.

The impacts of this are significant and should be given considerable weight during this review of the PCF.

Firstly, this means that the staff associations and others undertook a number of TWG meetings while under the impression that the RaSP commander present had the appropriate authority to reach agreement. The staff associations attend such meetings out of their own funds, which come from member subscriptions. The decision as to whether this is good use of PFEW and PSA funding is something that the staff associations should be empowered to make, based on an agreed way of working. Whilst it would be too strong to say we were purposely misled, it is clear that, on this occasion, there have been different understandings of roles, and delegations.

Secondly, this has undermined the authority of the RaSP commander in this case.

Thirdly, this has impacted on the goodwill of constituent members of the Forum. In particular, it was disappointing that no-one seemed to feel able to call the Metropolitan Police management to account for the confusion and nugatory work caused; nor to question whether the guest present should be able to overrule the national representatives’ process, given that the national representatives had, in good faith, engaged in significant discussions already, and reached agreement.

Suggested remedies:

- 3) In our view, this costly exercise might have been avoided had there been an independent chair, willing to enact an appropriate governance structure.

Further possible remedies

The below considers other possible ways, drawn from our experiences, in which the PCF could be reformed and improved in order to become a productive and useful Forum. However, there are two issues:

- First, whether the PCF can be improved to make it functional.

- Second, whether, even if the PCF were to function well, there are other issues within the broader landscape of mechanisms for consultation and discussion of pay and conditions that need to be addressed.

Firstly, therefore, with specific reference to improvement of the PCF, we have considered the following issues.

- **Terms of Reference/Resourcing/Funding**

The PCF terms of reference set out that the Forum provides a way to discuss and resolve matters that would otherwise have no means of resolution or would take up valuable PRRB time and resources. The intention was to facilitate quick and effective agreements on appropriate matters, and contribute to the maintenance of excellent industrial relations. This is a valued role that must be retained, however, it is clear that the PCF isn't currently achieving this.

There seems to be a lack of awareness/understanding of detail of the ToRs and this has hindered progress. As is detailed in the above example of RaSP, finalisation of the document agreed at the TWG was not even an option, though the appropriate process had been followed.

- 4) As mentioned above, we believe there is a need for an independent Chair and secretariat. Further, we would like the ToRs amended to ensure this is captured going forward, and for the Police Minister and Home Secretary to be asked to provide Home Office funding. This would provide independent oversight of the work being done, and the process being followed, and would enable timescales to be set and monitored. In preliminary discussions when the PCF was created potential members of the Forum were keen that there should be funding. The ToRs say that it may be the case that an appropriate use of time in meetings is to make a joint case to the Home Secretary for funding. PFEW and PSA still support this as a way forward, and further suggest that this letter could form the basis of a business case, given that we have set out the case studies we have, and the impact of failures thus far.
- 5) It would also be useful for the ToRs to include agreed timescales and protocols for basic Forum functions, such as the production of minutes, agendas, setting of meeting dates and so on. This would certainly help the Forum to progress matters more speedily.
- 6) It would be beneficial for the PCF to have a more formal, statutory footing, again, as is the case with the PABEW. The PABEW is a statutory body and this reflects the importance of the matters being considered by the Board. Pay and conditions matters, either those that can be progressed outside of the annual review body round, as well as any matters that can feed into the PRRB process should have equal status with those at PAB and this could be achieved by either ensuring the PCF is a statutory body, or alternatively by allowing the existing statutory body (PAB) to cover pay and conditions matters. This latter option would be the more cost effective for all parties, as well as ensuring more joined up working.

- **Membership**

Again, the recent discussions relating to the RaSP proposals highlighted the different understanding of the current membership of the PCF. This needs clarity for the work of the Forum to move forward.

- 7) Representatives from the Home Office, have in recent months, come as a matter of course to all PCF meetings and this has been useful in terms of updating the Forum on consultations on draft determinations; and it also ensures that work can be progressed in the full knowledge of how the Home Office may respond. We believe the Home Office should be members. If the statutory PABEW were to take on consideration of pay and conditions matters then HO attendance would be ensured.
- 8) The expected levels of delegation and role of all representatives on the Forum and TWGs is also worth considering in more detail. There is a difference between those representatives who are delegated to speak on behalf of the employer body or staff association, those who are present as support staff, and those who are observers only.

We believe this is a national Forum. That is how it was set up, and that shaped the original membership. We are unclear as to why the HR department from one force only has been invited. This seems to undermine the credibility of the national representatives, including the NPCC, who should be empowered and emboldened to speak on behalf of all forces. If not, then we would ask why not? The presence of one force HR department seems unfair to all other force HR departments. Further, it opens the possibility that individual force staff associations might also seek to attend. We suggest that the constituent members be confirmed as being those agreed at the outset, plus the Home Office.

- **Resolution process**

When the PNB was in existence, the process allowed for negotiation, conciliation and arbitration, when agreement could not be reached. However, these have all been lost since the PNB was disbanded. Winsor said that the PNB was bureaucratic and inefficient and quoted annual reports that said the PNB was taking between 2 months – two years seven months to reach agreement. Unfortunately, when compared to this the PCF has a very poor record. The points outlined above, with regards to a properly funded structure, with both chair and secretary, would help counter the current difficulties. Such a structure may also help move matters forwards and find areas of agreement between parties. Currently when matters reach a stalemate, as has been the case, there is simply no form of resolution available.

The PRRB has replaced the PNB in some regards (annual pay uplift etc) and PFEW values having a route for the consideration of other matters (ie, not restricted to the annual remit letter). The PCF offers the chance to reach agreement on matters raised by staff associations, however, it must work better, or

be replaced by a properly functioning committee.

- 9) When consideration is given to reforming the PCF, or looking at alternative ways for pay and conditions matters to be dealt with, PFEW would like to see a route for those matters where agreement can't be reached: a replacement for the arbitration process that was lost. If matters can't be agreed by the PCF (or alternative) then they should be automatically referred to an independent body for consideration. Given that officers have no right to strike, and further limitations on their rights, it seems absolutely unfair and contrary to natural justice that they should have no form of final redress or resolution over matters of pay and conditions.

Secondly, even were the PCF to be made to function well, we have considered whether the entire process of formal stakeholder engagement would be properly served, given the existing structures in the broader landscape. We have therefore considered the relationship to the PRRB, the CoP Regulatory Group, and the PABEW, and PPCF.

The current way in which the consultation process operates, and its governance, is of significant concern to PFEW.

Since the abolition of the PNB, and the creation of the PRRB/PCF and the College of Policing Regulatory Forum (CRG, or CCRG), there is no overall governance, and no one 'individual' taking responsibility for identifying the appropriate Forum where matters relating to pay and conditions should be considered. Previously, the Independent Chair of the PNB and the PABEW fulfilled this role, together with the Independent secretariat. This was particularly helpful during consideration of the Winsor review recommendations when a particular set of recommendations covered matters that fell within the terms of reference of more than one Forum. An example is the case of Limited Duties.

In addition, the changes to the arrangements for making regulations and determinations has also complicated matters. There is no statutory requirement for the College to consult stakeholders on matters relating to:

- Rank
- Probation
- Promotion

Previously, consideration of draft regulations and determinations relating to rank, promotion and probation fell within the terms of reference of the PAB. Following the introduction of the College this was removed from the PAB's terms of reference and it is not clear what the rationale was for this. There is no statutory requirement for the College to consult on matters that fall within its remit. In contrast, the Home Secretary is required to consult on matters relating to pay, allowances, hours of duty, leave, conduct, performance and complaints.

There are a number of examples where there is a clear and inseparable relationship between matters such as probation (which falls under the College RG remit) and matters such as performance (on which consultation must occur). The fact that the College is not required to consult on specific

aspects does not negate the need for consultation on all other matters relating to terms and conditions that fall within the terms of reference of either the PRRB/PCF and/or the PABEW. This is a concern that we have raised on numerous occasions.

The CRRG was established in response to such concerns, but our view is that this has never properly operated. The CRRG is not chaired independently, but rather by a member of the College Board, who has tried to bring some structure and focus. Despite a number of revisions to its terms of reference it is not clear that College project staff understand what its purpose is, who they should properly consult rather than engage with (including who it is that within organisations holds the delegated authority for consultation) or indeed what the remit of the College actually is, and where the boundaries are. To be clear, this is not entirely the fault of the College: as mentioned above there are matters where the boundaries are indistinct and the matters to be considered inseparable into the different Forums' categories of rank, probation, performance, and so on.

There are nonetheless a number of concerns about how the CRRG operates, that are similar to those we have raised regarding the PCF.

- Agenda papers are very often unclear as to what decisions are being sought and why changes are being made.
- There have been a number of occasions when College proposals have implications for matters that fall within the terms of reference of other fora such as the PCF or the PABEW. Examples include the introduction of three new entry routes, and changes to the rejoiner provisions: but these have not been identified by the College.
- Engagement with PFEW representatives at working group meetings is not a substitute for formal consultation with the PFEW and PSA National Secretary, or Deputy National Secretary, who are the staff associations' delegated authorities.
- Home Office input is minimal, but the CRRG would benefit from clear guidance from the Home Office on which is the appropriate Forum for dealing with matters.

As an example, the College proposed changes to regulation 10B relating to the standards and probationary period for rejoiners. However, as a consequence of these changes there were implications relating to the entitlements to leave and hours of work of rejoiners. As detailed above, there is a statutory requirement to consult on such matters. Regardless that the proposals originated from a College workstream, the College or the HO should have brought proposals and consulted the PCF on amendments to regulations & determinations. This was not done using the normal PCF consultation process. We raised concerns in our letter to the Home Office of 5 Nov 2018 and we feel this issue still needs further consideration.

In addition, it is the case that matters can be held up at point of HO consultation. This could undoubtedly be improved by better consultation within the PCF before draft determinations are sought (for example, the PCF could have provided fully

fleshed out proposals on the Children and Families Act), however, matters can also be held up at the drafting stage (for example, the part-time audit, and Police Constable Degree Apprentice pay starting point).


In regards to the pensions PPCF, and indeed the Scheme Advisory Board, members often express concerns about how pay changes are made without consideration of any link to pensions' issues.

However, in addition, the UKPPCF also suffers from issue of slow progress in many ways similar to those felt by members of the PCF.

Overall then, as our final recommendation, PFEW supports giving consideration to how the whole process should work, from the PRRB recommendation onwards, including consideration of how the PCF (or PABEW) should be involved.

I hope you find the above comments helpful, they are given in the spirit of open and constructive debate, so that matters can be improved for all involved. I am keen to discuss them with you in more detail both at the forthcoming PCF working group and in individual discussions with you.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Alex Duncan', with a horizontal line underneath.

ALEX DUNCAN

NATIONAL SECRETARY PFEW

A handwritten signature in blue ink, appearing to read 'Dan Murphy', with a long horizontal line underneath.

DAN MURPHY

NATIONAL SECRETARY PSA

Copy to:

Ron Hogg, APCC

Chief Constable Francis Habgood, NPCC

10 Annex 4 The P-Factor and our psychological contract work

- 10.1.1 In early 2018 a piece of work was commissioned within the PFEW research team aimed at creating a new measure of the psychological contract. This work was deemed necessary as current measures of the psychological contract are underpinned by theory which does not necessarily fit within a policing context. Specifically, the psychological contract is an individual's belief in a reciprocal obligation between the individual and the organization/their employer (Rousseau, 1989). This is naturally problematic as police officers are neither employees, nor is there necessarily an employer figure to fulfil any expectations. Current measures also ask questions about obligations which might be considered general across jobs, and therefore fail to ask about obligations relating to specialist equipment, or potential risks which are characteristic of policing yet not relevant to other jobs. Therefore, for the greatest understanding of police officers' psychological contracts, and whether these are being fulfilled or not, creation of a bespoke measure was necessary.
- 10.1.2 Following academically rigorous methods of scale construction, we conducted focus groups with police officers asking them what they felt, and what the wider membership might feel, the police service was obligated to provide them with and what they felt obligated to give as part of their job. These factors were identified via a series of interactive group/table based activities whereby attendees were asked to write down all obligations expected to be given to them and all obligations they expected to give, and organise them in to three existing frameworks. One chosen framework was the NPCC's P-Factor.
- 10.1.3 Analysis conducted on the data from these focus groups identified many obligations which attendees expect the organisation to provide them with, as well as many obligations which attendees felt they were obligated to give within their job. Whilst the purpose of this research was not focused around supporting or refuting the NPCC framework, the natural cross over of the two projects has meant that not only did our research echo many of the P-Factor domains but also highlighted components which might be beneficial to add to the P-Factor framework.
- 10.1.4 Specifically, this might encompass the extending of 'the physical' domain beyond 'High risk of physical harm and expectation of assault' and address more directly that policing includes an element of risk meaning that an officer may end up giving

their life. The idea of giving their 'life' or reduced life expectancy was suggested by many focus group attendees when asked what they expected or were obligated to give to the organisation. However, this is possible not only in the mortal sense and was instead clarified by some focus group attendees as referencing the giving of their professional life and time as opposed to their physical life. The idea of giving your whole professional life to an organisation is arguably above and beyond what would be expected of employees working within many other organisations considering the career fluidity which now exists within the working world. However, it is questionable whether this is something officers are now expected to do considering the recent initiatives of the College of Policing. Nonetheless, it seems at very least to be something officers are willing to do and it is therefore questionable whether it might have a place within the P-Factor framework.

10.1.5 Within the focus groups, the most common obligation which attendees felt they should provide the organisation with was honesty and integrity. Whilst this is of course necessary in the vast majority of jobs, the nature of policing and the power entrusted within officers arguably makes the honesty and integrity of police officers additional to that required within other jobs. Whilst behaviours relating to honesty and integrity are included within the current P-Factor, such as declaring business activities and 'nonfeasance', the P-factor framework does not discuss honesty and integrity as factors in their own right and not embedded within other P-Factor sub-domains. This is also the case for loyalty, dedication and commitment which were all common concepts suggested by focus group attendees as what they expected to give to the organisation. Again, these three factors are implied within various P-Factor domains, however, the level of loyalty and commitment exhibited and often internalised by officers is undoubtedly greater than is present within other jobs, and indeed is greater than would be necessary within other jobs. To put this plainly, there is an additional layer of commitment and dedication required to knowingly join and stay within a job where an individual might be required to stay on shift for an unspecified amount of extra time, have rest days cancelled at short notice or respond to jobs where they may be at risk of danger, and continue to come back to work shift after shift. This is not a level of commitment which would be expected or actually exhibited by many workers within other jobs and therefore consideration of its own sub-domain within 'the psychological' is recommended.

10.1.6 Additionally, our research highlighted that focus group attendees are obligated by the organisation to maintain their fitness and health which is extra to what many jobs would deem necessary, particularly to the standards required by the police service. However, this is currently not included within the P-Factor framework and therefore this might require review for inclusion within 'the physical'.

11 Annex 5 Through Career Surveys: Evidence of officers' experiences at key career points

11.1 Through Career Research Programme

11.1.1 PFEW's Through Career research programme has been developed to establish an evidence base about officers' expectations about their job and their career and, importantly, to identify how well these expectations are being met.

11.1.2 The research programme comprises a number of different surveys which are sent to officers at specific points during their service. This currently includes a survey of new starters and a survey of leavers, as well as surveys of officers at key points during their career, such as the end of their probationary period and after their ARC assessment to reach Pay Point 4 on the Constables Pay Scale.

11.1.3 We have made use of existing academic psychological contract measures³⁶ to be able to examine the extent to which officers' psychological contracts with the police service are being fulfilled (although as noted in the previous annex, we are also now in the process of developing a psychological contract measure specifically for police officers, which will be used within the Through Career programme from 2019 onwards). We have also used existing questions concerning officers' motivation for joining³⁷, to understand why respondents' joined the police, and in the long-run to also examine met or unmet job expectations. Both psychological contract fulfilment and met job expectations have repeatedly been shown to be predictors of morale and motivation^{38,39} therefore ultimately have consequences for organisational effectiveness⁴⁰.

³⁶ Coyle- Shapiro, J., & Kessler, I. (2000). Consequences of the psychological contract for the employment relationship: A large scale survey. *Journal of management studies*, 37(7), 903-930.

³⁷ Raganella, A. J., & White, M. D. (2004). Race, gender, and motivation for becoming a police officer: Implications for building a representative police department. *Journal of criminal justice*, 32(6), 501-513.

³⁸ Zhao, H. A. O., Wayne, S. J., Glibkowski, B. C., & Bravo, J. (2007). The Impact of Psychological Contract Breach on Work- Related Outcomes: A Meta- Analysis. *Personnel Psychology*, 60(3), 647-680.

³⁹ Wanous, J. P., Poland, T. D., Premack, S. L., & Davis, K. S. (1992). The effects of met expectations on newcomer attitudes and behaviors: a review and meta-analysis, 77(3), 288-297.

⁴⁰ Need to ref.

11.1.4 PFEW has also worked with academics at King's College, London to develop a new set of indicators to assess how well the police service is meeting officers' career priorities, as there was no existing measure of this available within peer-reviewed academic literature. Between October and December 2017 PFEW ran a pilot study to test these questions, and they have been included within the Through Career Programme's Post-Probation and Post-ARC surveys since 2018.

11.1.5 A summary of findings from the Through Career Programme to date can be found within the following reports, available on request:

- PFEW New Starters' Survey 2017/2018 Headline Statistics September 2018 (R096/2018)
- Leavers' Survey October 17 – April 2018 (R092/2018)
- Officer Career Satisfaction Pilot Study - Descriptive Statistics December 2017 (R112/2017)

11.1.6 One of the main benefits of the Through Career Programme is its ability to compare data from different surveys by using a consistent set of questions in each survey. Below are some illustrative findings from the Programme as a whole that compare data contained within the three aforementioned reports.

11.2 Who joins the service currently?

11.2.1 The Through Career Programme surveys also collect data on respondents' demographic background. It must be remembered that this is the demographic background of respondents to the survey, rather than all new starters, leavers etc. However, statistics published by the Home Office or College of Policing currently do not go into the level of detail that is possible using survey data. The Through Career Programme therefore also provides a useful insight into who is currently joining and leaving the police service.

11.2.2 35% of New Starters' Survey respondents this year were female and 9% were Black or Minority Ethnic (BME). Both of these proportions were in line with the most recent Home Office workforce statistics (The Home Office statistics do however cover a slightly different period, between April 2017 and March 2018).

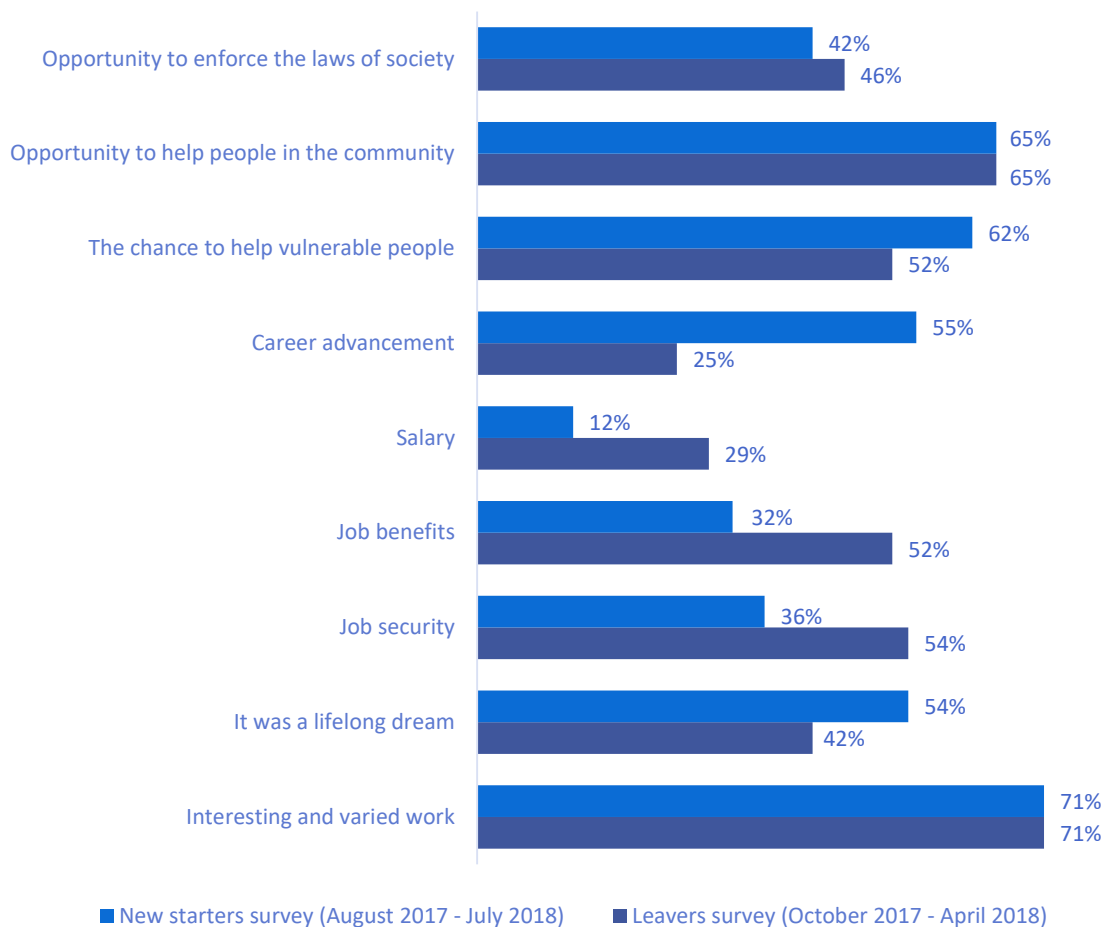
11.2.3 The average age of new starters was 28 and 25% said that they had some form of carer responsibilities; 21% said that they had caring responsibilities for a child or children under the age of 16. 45% of new starters held a degree-level qualification or equivalent (although this was much less common amongst new starters with carer responsibilities compared to those without carer responsibilities (at 26% and 49% respectively). In addition, just over half of new starters (51%) had some form of prior work experience within the police service before becoming a police officer, and 28% said that they had come directly from another paid role within the police, either as a PCSO or member of police staff. None of these statistics regarding the background of new starters are currently collected by the College of Policing or the Home Office at a national level.

11.3 Motivation for joining

11.3.1 The New Starters' survey shows that the reasons most likely to motivate new starters to become a police officer were: the interest and variety of the work, the chance to help vulnerable people, and the opportunity to help people in the community. Conversely the reasons least likely to motivate new starters to join were the salary, job benefits and job security. Comparison of motivations for joining the police cited by new starters and by leavers highlights a number of similarities. For instance, the opportunity to help people in the community and the interest and variety of the work were the most common motivations for joining amongst both starters and leavers, and indeed were identical proportions across the two surveys.

11.3.2 There were, however, also some notable differences. Respondents in the New Starters' Survey were less likely than respondents in the Leavers' Survey to cite salary, job benefits and job security as reasons for joining, however new starters were much more likely than leavers to say that the opportunity for career advancement had a big impact on their decision to join (55% compared to 25%).

Motivation for joining given by respondents in the PFEW's New Starters' Survey and Leavers' Survey (big impact on decision to join)



11.4 Starters' Expectations, vs Leavers' experiences

11.4.1 More than nine out of ten respondents in the New Starters' Survey felt that the police service had an obligation to provide them with up-to-date training and development to either a large or very large extent. In addition, a large majority of respondents felt that the police service had an obligation to provide them with fair pay, long-term job security, support to learn new skills and good career prospects.

11.4.2 Turning to responses within the Leavers' Survey illustrates, however, that amongst officers leaving the police service, many of these obligations are currently perceived to have not been fulfilled (that is, they have been "breached"). For instance, 73% of Leavers' Survey respondents did not feel that the police service had fulfilled an obligation to provide fair pay for the responsibilities of their job, and 66% did not feel that an obligation to provide up-to-date training and

development had been fulfilled.

11.4.3 As such there appears to be evidence of widespread perceptions of psychological contract breach amongst leavers. This is particularly apparent with regards to pay and benefits, however it is not limited to remuneration, with learning and development obligations also not being fulfilled. The New Starters' Survey shows that these obligations remain important to officers joining the service today, thus highlighting a risk of future psychological contract breach for new joiners as well if these obligations are not fulfilled.

| | Proportion of respondents in New Starters' Survey who felt that the police service had an obligation to provide... | Proportion of respondents in Leavers' Survey who felt that obligation to provide had not been fulfilled |
|--|--|---|
| Fair pay for the responsibilities in your job | 86% | 73% |
| Pay increases to maintain your standard of living | 77% | 69% |
| Up-to-date training and development | 94% | 66% |
| A benefits package that is comparable to employees doing similar work in other organisations | 79% | 65% |
| Support to learn new skills | 87% | 57% |
| Good career prospects | 82% | 40% |
| Long-term job security | 80% | 17% |

11.5 Career priorities

11.5.1 Respondents to the New Starters' Survey were also asked a series of questions about what they actually saw as their career expectations and priorities. More than nine out of ten respondents said that helping improve people's lives through their work was very important to them, that developing their skills to a high level of competence was their main career driver and that they wanted a career that provides a sense of security and stability (94.4%).

11.5.2 In addition, a majority of respondents said they wanted a sense of freedom and autonomy within their career (58%), whilst a large minority (43%) said that progressing to a senior managerial position was very important to them. This is much higher than the proportion of officers in England and Wales who currently hold a managerial position (e.g. only 22% of officers occupy a rank higher than

Constable and just 7% are in the rank of Inspector or above)⁴¹.

11.5.3 Moreover, comparison of responses from established officers within the pilot Career Satisfaction Survey with new starters' career priorities identified in the New Starters' Survey indicates further areas of discrepancy between what new starters expected and what they might realistically expect to achieve. For instance, 43% of new starters said that progressing to a senior managerial position was very important to them, however only 22% of established officers said that their career provided them with the opportunities they wanted for promotion. Similarly, whilst 58% of new starters said that having a sense of freedom and autonomy was important to them, only 19% of experienced officers said that they had the freedom and autonomy that they wanted within their career.

11.5.4 The most substantial difference between priorities on joining and established officers' experiences was that whilst 93% of new starters said that helping improve people's lives through their work was very important to them, just 13% of established officers felt that they were able to help the public as much as they would like to. Together these findings suggest that there may be a number of barriers to new starters achieving what they see as a productive and fulfilling career within the police service. Again this highlights future risks for morale and motivation if new starters' career expectations are not met.

| New starters' survey | | Career satisfaction survey | |
|---|-----|----------------------------|--|
| Progressing to a senior managerial position now or in future is very important to me | 43% | 22% | My career provides me with the opportunities I want for promotion |
| Developing my policing skills to an extremely high level of competence is my main career driver | 93% | 81% | I have developed a high level of competence as a police officer |
| Helping improve people's lives through my work is very important to me | 93% | 13% | I feel I can help the public as much as I would like to |
| Having a sense of freedom and autonomy is important to me in my career | 58% | 19% | I have a career that gives me the freedom and autonomy that I want |
| I want a career where I can avoid conflict between my personal and family life | 43% | 26% | I think I am achieving a good work-life balance |

⁴¹ Police Workforce Statistics England and Wales 31 March 2018 available at <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2018>

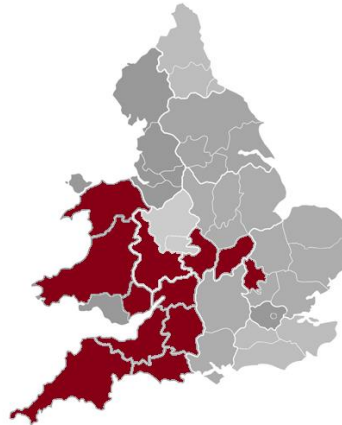
12 Annex 6 The impact of reduced officer numbers

12.1 Demand and capacity

12.1.1 Since 2009, there has been a consistent and significant reduction in the no. of police officers in England and Wales year on year.⁴²

12.1.2 More specifically, there has been a 14% reduction in the number of police officers, equating to over 21 thousand officers - the equivalent of losing more officers than were employed across the following 12 forces in 2010:⁴³

1. Devon and Cornwall
2. Avon and Somerset
3. Wiltshire
4. Gloucestershire
5. Northamptonshire
6. Warwickshire
7. West Mercia
8. Gwent
9. Dyfed-Powys
10. Bedfordshire
11. North Wales
12. Dorset



⁴² Home Office (2018).

⁴³ Home Office (2018).

12.1.3 Unfortunately, this reduction in capacity has come at a time of increasing demand. Although policing is much more than just investigating crime (HMIC, 2014),⁴⁴ police recorded crime figures can give a crude indication of the increasing demand being faced by officers.

12.1.4 For the last 5 years, the overall number of police recorded crime has been rising steadily (figure 1),⁴⁵ and since June 2017,⁴⁶ there has been a sharp increase in a number of specific types of crime, including some higher-harm violent offences, for example;

- A **23%** increase in possession of weapons offences;
- A **21%** increase in reported rapes;
- A **19%** increase in offences related to violence against the person;
- An **18%** increase in sexual offences, and;
- A **12%** increase in police recorded offences involving a knife or sharp instrument.

12.1.5 Child Sexual Exploitation and Abuse (CSEA) crimes are also increasing; with analysis by the National Crime Agency, showing that there was a 700% increase in CSEA referrals between 2013 and 2017.⁴⁷ Investigations into crime such as this are often challenging and complex, placing substantial demands on police resources and capability.⁴⁸

⁴⁴ Her Majesty's Inspectorate of Constabulary (2014).

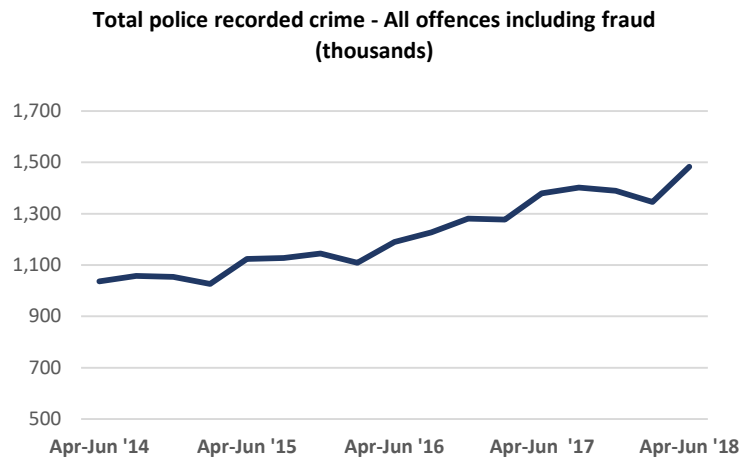
⁴⁵ Office of National Statistics (2015); Office of National Statistics (2016); Office of National Statistics (2017); Office of National Statistics (2018a).

⁴⁶ Office of National Statistics (2018b).

⁴⁷ National Crime Agency (2018).

⁴⁸ National Audit Office (2018).

Figure 28: Recorded crime figures over time



12.1.6 This changing topography, particularly the increase in complex crimes, has a direct impact on the demands facing the police service and their capacity to meet them. Not only are additional resources required to manage such labour intensive investigations, but complicated investigations such as these may also require officers to acquire additional specialist skills to be efficient.

12.1.7 Although there has been increased public scrutiny and debate surrounding the police services' ability to understand and manage demand over the last few years,⁴⁹ there are still no common standards for measuring policing demands, and almost a quarter of forces are not meeting enough of their demand or are managing it inappropriately.⁵⁰

⁴⁹ National Audit Office (2015); National Audit Office (2018); Her Majesty's Inspectorate of Constabulary (2015); Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (2016); Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (2017); The Police Federation of England and Wales (2018a).

⁵⁰ Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (2017).

12.2 Consequences of demand and capacity imbalance

12.2.1 It is not unreasonable to assume that a combination of reduced capacity and increased demand may have a negatively affect the efficacy and efficiency of the police service. Indeed, recent results from PFEWs 2018 Demand, Capacity and Welfare Survey revealed that the vast majority of officers believe that they do not have enough officers to manage the demands faced by their team/unit (89.87%); a larger proportion than in 2016 (84.5%).⁵¹

12.2.2 Results from the 2018 Demand, Capacity and Welfare Survey also indicate that the majority of officers feel that the current imbalance between demand and capacity is prohibiting them from doing their job properly (83.2%), to a standard that they could be proud of (64.9%), or from engaging in proactive policing (74.2%). All of which represent a larger proportion than in the 2016 survey.

12.2.3 However, the impacts of increased demand and reduced capacity are not limited at the service, or force level. There is a widespread and growing perception amongst rank and file officers, that the requirements being placed on them as individuals is excessive. For example, 72.4% of officers now report that their workloads are too high; over 6 percentage points higher than in 2016 (65.9%).⁵²

12.2.4 Poor demand and capacity balance does not just affect the services ability to perform its duties, but it also has implications in regard to the health and wellbeing of the officers themselves.

12.2.5 Previous research from the PFEW on Demand, Capacity and Welfare⁵³ has demonstrated that there is a clear and demonstrable link between demand and capacity pressures and aspects of officer wellbeing. For example, Officers that reported frequently experiencing unrealistic time pressures were also:

- Over 6 times more likely to report low morale
- Over 5 times more likely to report poor overall mental wellbeing
- Over 5 times more likely to experience fatigue, and
- Over 5 times more likely to report never or rarely feeling relaxed.

⁵¹ The Police Federation of England and Wales (2018b)

⁵² The Police Federation of England and Wales (2018b)

⁵³ Houdmont & Elliott-Davies (2017).

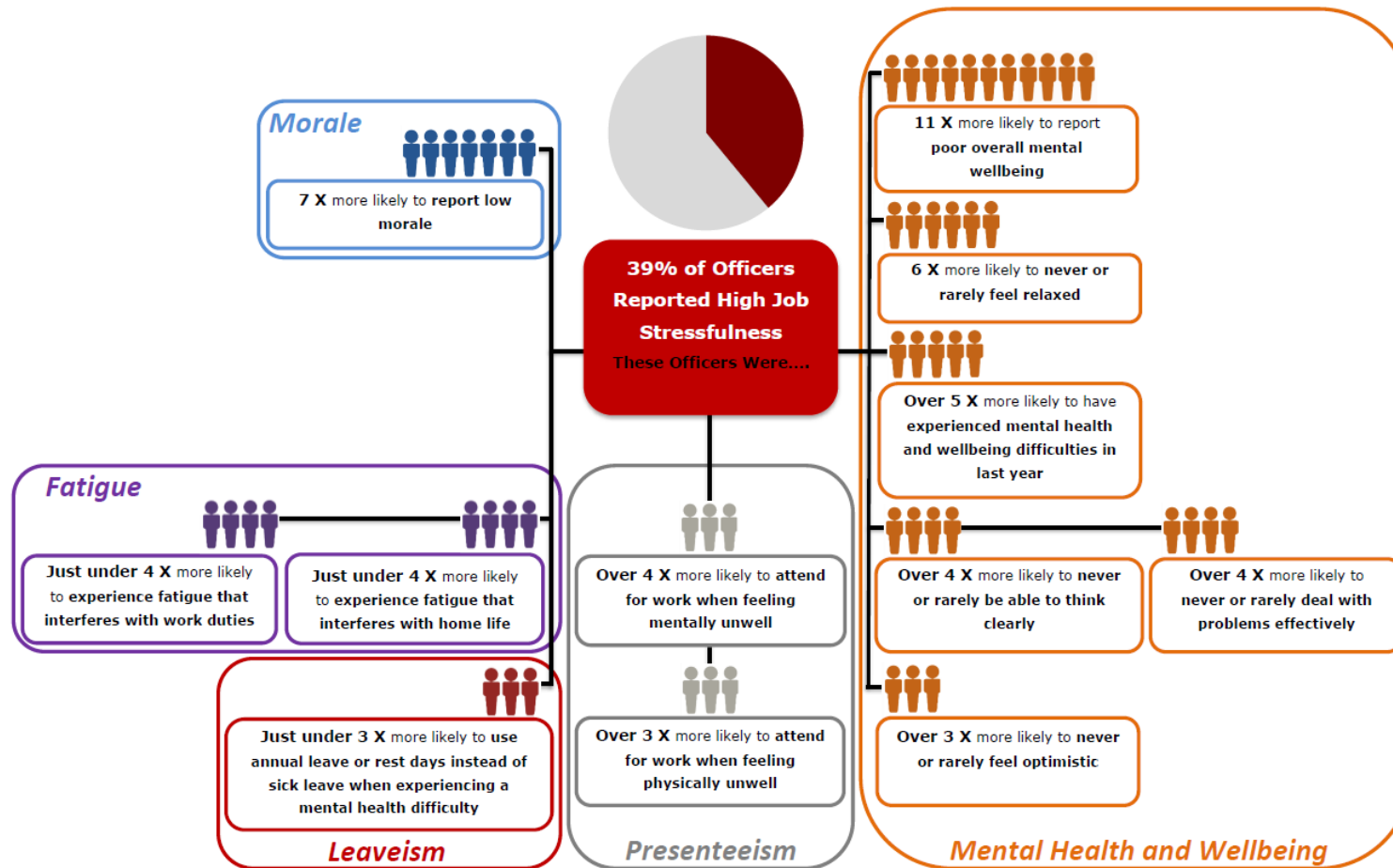
12.2.6 Regrettably, the proportion of officers reporting that they frequently experience unrealistic time pressures has increased by over 5 percentage points since 2016.

12.2.7 Work-related stress was also linked to range of health and wellbeing issues (figure 2), and has increased since 2016 by over 5 percentage points; with 43.9% of respondents now reporting a non-diagnostic case of work-related stress in this year's survey (on the basis that they viewed their job as *very* or *extremely* stressful). This is almost **three times that found in the general population** by the Health and Safety Executive in 2010 (15.0%),⁵⁴ and that found by the Scottish Health Survey in 2017 (16%).

12.2.8 These results highlight a continuing theme whereby committed officers are having to work inordinately hard in an attempt to maintain previous levels of service in the face of increased demand, less capacity and fewer resources at the detriment to their health. Continuing the proliferation of a workforce than can be characterised as tired tense and targeted.

⁵⁴ The Health and Safety Executive (2012).

Figure 29: The impacts of reduced officer numbers: wellbeing, morale, fatigue, leaveism



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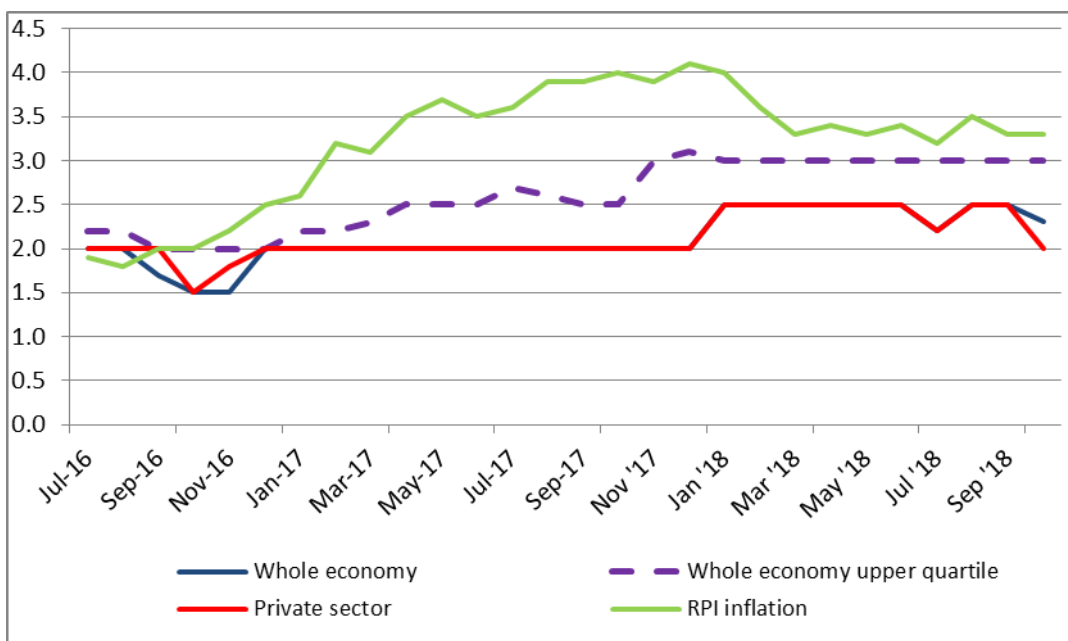
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13 Annex 7 Additional Economic analysis

Public and private sector pay rises

13.1.1 The following graph showing pay settlements in the whole economy and the private sector over the past two years shows settlements more recently clustering around a median of 2.5%.⁵⁵ As with last year, there has been a noticeable growth in the whole economy upper quartile figure from 2% in September 2016 to 2.5% in October 2017 and 3% now.

Figure 30: Whole economy and private sector median pay settlements and RPI inflation, July 2016 to October 2018 (XpertHR)



Overall impacts on police pay: inflation and loss of components of pay

13.1.2 As in previous years we have used data collected by the Home Office for the most recent financial year 2017-18.

⁵⁵ *Pay trends November 2018: Slight fall in median pay award*, XpertHR. Based on charts 1 and 2 linked to excel data. Available from XpertHR website, <https://www.xperthr.co.uk/survey-analysis/pay-trends-november-2018-slight-fall-in-median-pay-award/163843/> RPI inflation from ONS, *Consumer Price Inflation Bulletins* from July 2016 to November 2018. See complete *Consumer Price Inflation Reference Tables*, November 2018 (Table 37 RPI All Items: 1948 to 2018) on ONS website at <https://www.ons.gov.uk/economy/inflationandpriceindices/datasets/consumerpriceinflation>

- 13.1.3 Average nominal pay data from the Earnings and subsequent Police Workforce Censuses for 2010 to 2018 is used as the basis for calculating the fall in average real pay for both federated and superintending rank officers. 2009-10 is taken as the base year, and RPI inflation rates for each financial year have been calculated from the 12 month rate published every month by the Office for National Statistics (ONS).
- 13.1.4 As in previous years we have used the Census figures for nominal average pay (basic and total) in each financial year from 2009-10 to 2017-18 for full-time officers in each rank ,⁵⁶ and then calculated the nominal percentage increase from one year to the next and set this against RPI inflation for each year, and cumulatively across the period.⁵⁷
- 13.1.5 The real terms pay of Sergeants fell by about 15% (basic) and 19% (total). There were also continuing falls in the real pay of Inspectors (about 16% basic and about 20% total) and Chief Inspectors (about 16% basic and 21% total).

⁵⁶ Total pay now includes the following allowance payments: London Weighting, location, overtime, replacement, unsocial hours, overnight, hardship, on-call, other additional allowances, and in the past federated ranks' CRTP and SPP, and superintending ranks' bonus payments. Since the 2010 base data excluded 'other additional allowances' (dog handler payments, secondment payments etc.) due to the incorrect inclusion of expenses the total pay figures for 2011 to 2017, which included such payments, was adjusted accordingly.

⁵⁷ RPI inflation average for each financial year calculated from monthly figures in complete *Consumer Price Inflation Reference Tables*, November 2017 (Table 37 RPI All Items 12 months % change: 1948 to 2017) on ONS website at <https://www.ons.gov.uk/economy/inflationandpriceindices/datasets/consumerpriceinflation>

Figure 31: Average basic pay in real terms for federated ranks (at 2009-10 prices)

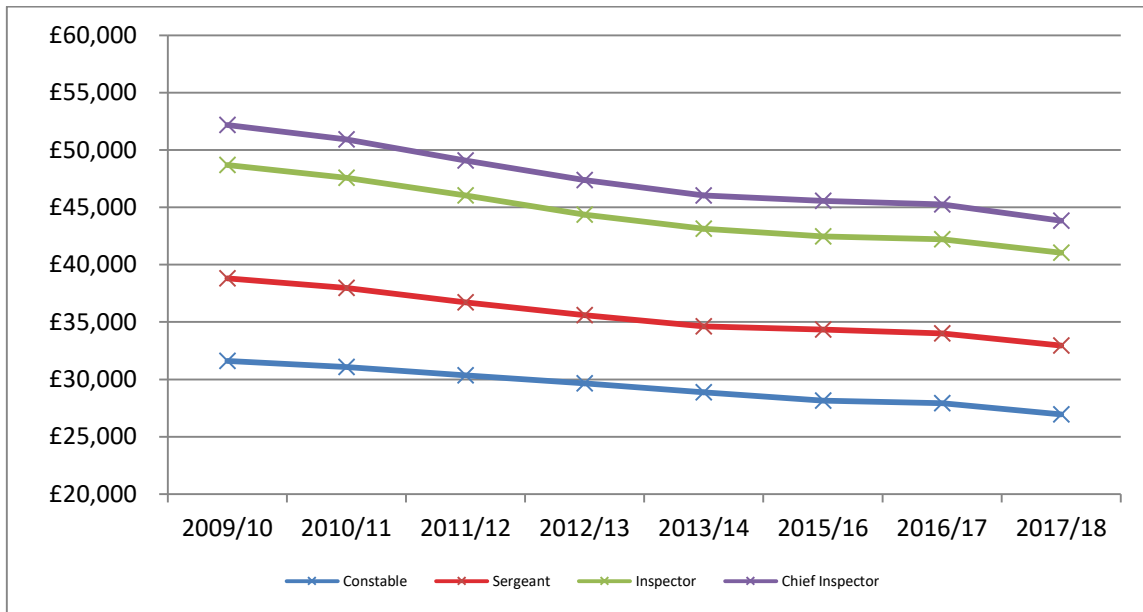


Figure 32: Average total pay in real terms for federated ranks (at 2009-10 prices)

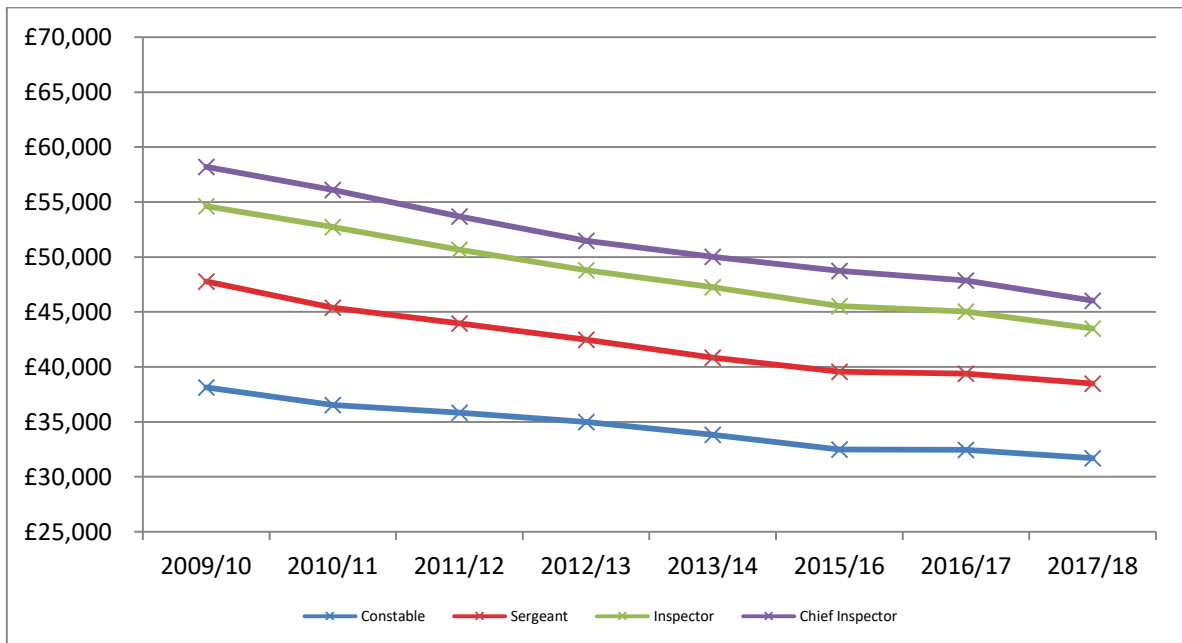


Figure 33: Average basic pay in real terms for superintending ranks (at 2009-10 prices)

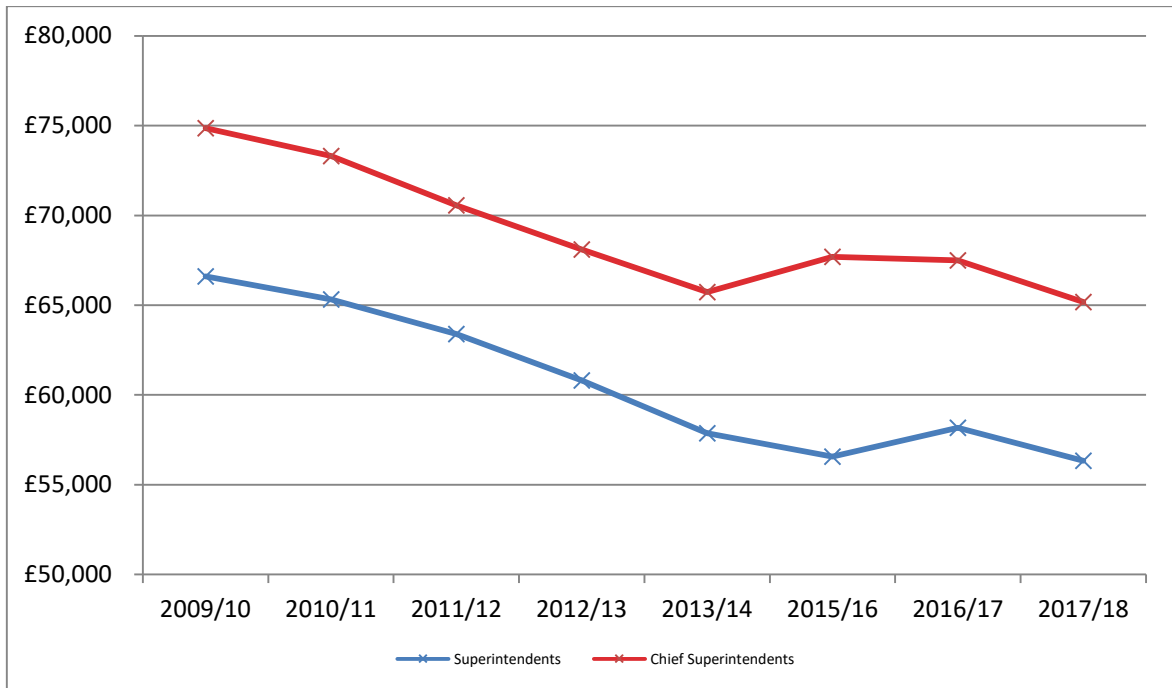
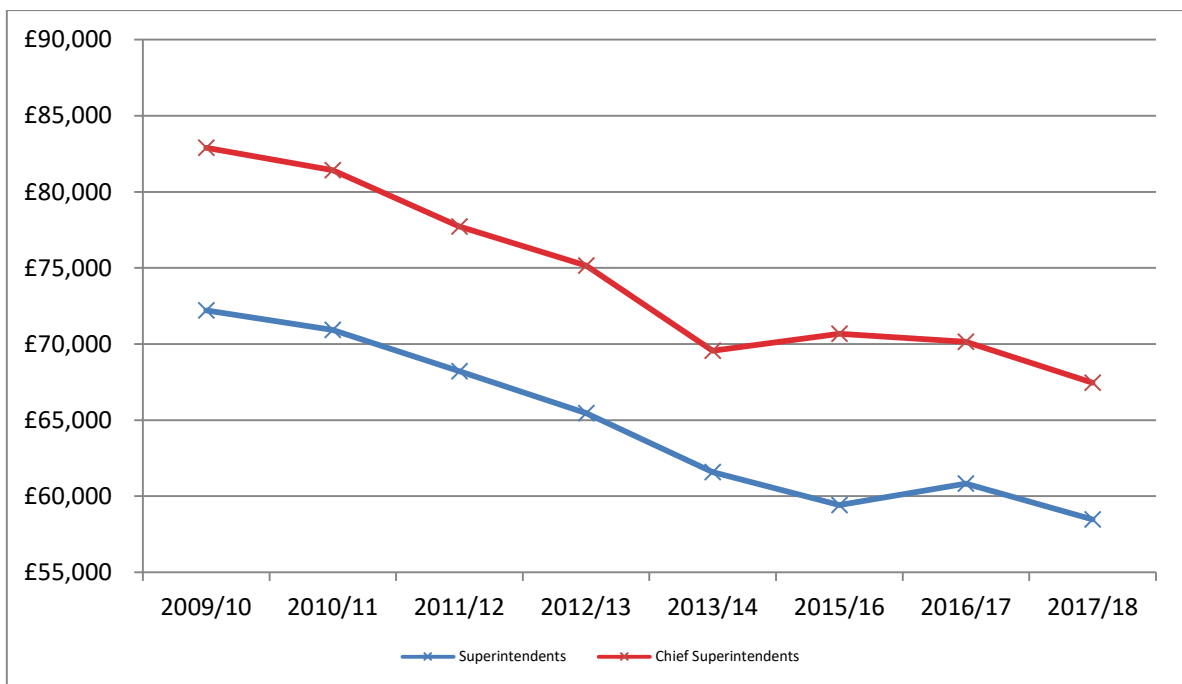


Figure 34: Average total pay in real terms for superintending ranks (at 2009-10 prices)



13.1.6 Likewise, over the period as a whole Superintendents' pay has fallen in real-terms by around 15% in basic and 19% in total pay. For Chief Superintendents, there has been a fall of just under 13% in basic and 19% in total pay.

14 Annex 8 Procedural justice pay calculations in full

Figure 35: Constables' procedural justice pay calculation P @ 14%

| P factor @ 14% | | | | | | | | | | | | | | |
|--|---------------------------------------|---|----------------|--|--|------------------------|---|---------|---------|---------|---|--|--|--|
| CONSTABLES' PAY SCALE | | | | | | | | | | | | | | |
| | Median of appropriate benchmark group | Benchmark group | P factor @ 14% | Procedural justice salary calculation median + P @ 14% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 14% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account at 2.1% each year ² | Yr1 | Yr2 | Yr3 |
| Starting salary all degree holders | £24,000 | XpertHR degree holder median | £3,360 | £27,360 | At pay point 1 £27,360 - £23,586 = £3,774 | 16.0% | £23,586 Yr 1 5.06% Yr2 5.06% Yr3 5.06% | £24,779 | £26,033 | £27,351 | £23,586 Yr 1 7.33% Yr2 7.33% Yr3 7.33% | £23,586 x -2.1% = £23,091 x 7.33% =£24,783 | £24,783 x -2.1% = £24,263 x 7.33%=£26,041 | £26,041 x -2.1% = £25,494 x 7.33%= £27,363 |
| 5 years in | £30,070 | Paramedic at 5 years | £4,210 | £34,280 | Pay point 5 £34,280 - £28,947 = £5,333 | 18.4% | £28,947 Yr1 5.8% Yr2 5.8% Yr3 5.8% | £30,626 | £32,402 | £34,282 | £28,947 Yr1 8.07% Yr2 8.07% Yr3 8.07% | £28,947 x -2.1% = £28,339 x 8.07% =£30,626 | £30,626 x -2.1% = £29,983 x 8.07% =£32,403 | £32,403 x -2.1% = £31,722 x 8.07% =£34,282 |
| Top of the scale | £39,406 | Teacher, without leadership role ¹ | £5,517 | £44,923 | Pay point 7 in 2018 £44,923 - £39,150 = £5,773 | 14.7% | £39,150 Yr1 4.69% Yr2 4.69% Yr3 4.69% | £40,986 | £42,908 | £44,921 | £28,947 Yr1 6.96% Yr2 6.96% Yr3 6.96% | £39,150 x -2.1% = £38,328 x 6.96% =£40,995 | £40,995 x -2.1% = £40,135 x 6.96% =£42,928 | £42,928 x -2.1% = £42,027 x 6.96% =£44,951 |
| ¹ NASUWT Classroom teachers' salary scales https://www.nasuwt.org.uk/uploads/assets/uploaded/e2c3ba3f-20f3-410c-ae4b83329cbe3e4a.pdf | | | | | | | | | | | | | | |
| See HM Treasury, Forecasts for the UK economy: November 2018, 21 November 2018. New independent forecasts only, see Table M3, p20 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757823/Forecomp_November_2018_PDF.pdf | | | | | | | | | | | | | | |

Figure 36: Constables' procedural justice pay calculation P @ 10%

| P factor @ 10% | | | | | | | | | | | | | | |
|------------------------------------|---------------------------------------|---|----------------|--|--|------------------------|---|---------|---------|---------|--|--|--|--|
| CONSTABLES' PAY SCALE | | | | | | | | | | | | | | |
| | Median of appropriate benchmark group | Benchmark group | P factor @ 10% | Procedural justice salary calculation median + P @ 10% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 10% (not taking | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Starting salary all degree holders | £24,000 | XpertHR degree holder median | £2,400 | £26,400 | At pay point 1 £26,400 - £23,586 = £2,814 | 11.9% | £23,586 Yr 1 3.82% Yr2 3.82% Yr3 3.82% | £24,487 | £25,422 | £26,394 | £23,586 Yr 1 6.09% Yr2 6.09% Yr3 6.09% | £23,586 x -2.1% = £23,091 x 6.09% =£24,497 | £24,497 x -2.1% = £23,982 x 6.09%=£25,443 | £25,443 x -2.1% = £24,909 x 6.09%= £26,426 |
| 5 years in | £30,070 | Paramedic at 5 years | £3,007 | £33,077 | Pay point 5 £33,077 - £28,947 = £4,130 | 14.3% | £28,947 Yr1 4.55% Yr2 4.55% Yr3 4.55% | £30,264 | £31,641 | £33,081 | £28,947 Yr1 6.82% Yr2 6.82% Yr3 6.82% | £28,947 x -2.1% = £28,339 x 6.82% =£30,272 | £30,272 x -2.1% = £29,636 x 6.82% =£31,657 | £31,657 x -2.1% = £30,993 x 6.82% =£33,106 |
| Top of the scale | £39,406 | Teacher, without leadership role ¹ | £3,941 | £43,347 | Pay point 7 in 2018 £43,347 - £39,150 = £4,197 | 10.7% | £39,150 Yr1 3.45% Yr2 3.45% Yr3 3.45% | £40,501 | £41,898 | £43,343 | £39,150 Yr1 5.72% Yr2 5.72% Yr3 5.72% | £39,150 x -2.1% = £38,328 x 5.72% =£40,520 | £40,520 x -2.1% = £39,669 x 5.72% =£41,938 | £41,938 x -2.1% = £41,058 x 5.72% =£43,406 |

Figure 37: Sergeants' procedural justice pay calculation P @ 14%

| SERGEANTS' PAY SCALE | | | | | | | | | | | | | | |
|----------------------|---------------------------------------|----------------------|----------------|--|--|------------------------|---|---------|---------|---------|--|--|--|--|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 14% | Procedural justice salary calculation median + P @ 14% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 14% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £39,400 | National KFH level 1 | £5,516 | £44,916 | At pay point 1 (bottom) £44,916 - £40,488 = £4,428 | 10.9% | £40,488 Yr1 3.52% Yr2 3.52% Yr3 3.52% | £41,913 | £43,389 | £44,916 | £40,488 Yr1 5.79% Yr2 5.79% Yr3 5.79% | £40,488 x -2.1% = £39,638 x 5.79% =£41,933 | £41,933 x -2.1% = £41,052 x 5.79%=£43,429 | £43,429 x -2.1% = £42,517 x 5.79%= £44,979 |
| Top of the scale | £46,098 | National KFH level 2 | £6,454 | £52,552 | Pay point 4 (top) £52,552 - £43,998 = £8,554 | 19.4% | £43,998 Yr1 6.1% Yr2 6.1% Yr3 6.1% | £46,682 | £49,529 | £52,551 | £43,988 Yr1 8.37% Yr2 8.37% Yr3 8.37% | £43,998 x -2.1% = £43,074 x 8.37% =£46,679 | £46,679 x -2.1% = £45,699 x 8.37% =£49,524,403 | £49,524 x -2.1% = £48,484 x 8.37% =£52,542 |

Figure 38: Sergeants' procedural justice pay calculation P @ 10%

| SERGEANTS' PAY SCALE | | | | | | | | | | | | | | |
|----------------------|---------------------------------------|----------------------|----------------|--|--|------------------------|---|---------|---------|---------|--|--|--|--|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 10% | Procedural justice salary calculation median + P @ 10% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 10% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £39,400 | National KFH level 1 | £3,940 | £43,340 | At pay point 1 (bottom) £43,340 - £40,488 = £2,852 | 7.0% | £40,488 Yr1 2.3% Yr2 2.3% Yr3 2.3% | £41,419 | £42,372 | £43,346 | £40,488 Yr1 4.57% Yr2 4.57% Yr3 4.57% | £40,488 x -2.1% = £39,638 x 4.57% =£41,449 | £41,449 x -2.1% = £40,579 x 4.57%=£42,433 | £42,433 x -2.1% = £41,542 x 4.57%= £43,441 |
| Top of the scale | £46,098 | National KFH level 2 | £4,609.80 | £50,708 | Pay point 4 (top) £50,708 - £43,998 = £6,710 | 15.3% | £43,998 Yr1 4.85% Yr2 4.85% Yr3 4.85% | £46,132 | £48,369 | £50,715 | £43,998 Yr1 7.12% Yr2 7.12% Yr3 7.12% | £43,998 x -2.1% = £43,074 x 7.12% =£46,141 | £46,141 x -2.1% = £45,172 x 7.12% =£48,388 | £48,388 x -2.1% = £47,372 x 7.12% =£50,745 |

Figure 39: Inspectors' procedural justice pay calculation P @ 14%

| INSPECTORS' PAY SCALE | | | | | | | | | | | | | | |
|-----------------------|---------------------------------------|-----------------|----------------|--|--|------------------------|---|---------|---------|---------|--|---|---|---|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 14% | Procedural justice salary calculation median + P @ 14% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 14% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £54,034 | National KFH | £7,565 | £61,599 | At pay point 0 (bottom) £61,599 - £50,160 = £11,439 | 22.8% | £50,160 Yr1 7.09% Yr2 7.09% Yr3 7.09% | £53,716 | £57,525 | £61,603 | £50,160 Yr 1 9.36% Yr2 9.36% Yr3 9.36% | £50,160 x -2.1% = £49,107 x 9.36% = £53,703 | £53,703 x -2.1% = £52,575 x 9.36% = £57,496 | £57,496 x -2.1% = £56,289 x 9.36% = £61,558 |
| Top of the scale | £54,034 | National KFH | £7,565 | £61,599 | Pay point 3 (top) £61,599 - £54,408 = £7,191 | 13.2% | £54,408 Yr1 4.22% Yr2 4.22% Yr3 4.22% | £56,704 | £59,097 | £61,591 | £54,408 Yr1 6.49% Yr2 6.49% Yr3 6.49% | £54,408 x -2.1% = £53,265 x 6.49% = £56,722 | £56,722 x -2.1% = £55,531 x 6.49% = £59,135 | £59,135 x -2.1% = £57,893 x 6.49% = £61,651 |

Figure 40: Inspectors' procedural justice pay calculation P @ 10%

| INSPECTORS' PAY SCALE | | | | | | | | | | | | | | |
|-----------------------|---------------------------------------|-----------------|----------------|--|--|------------------------|---|---------|---------|---------|--|---|---|---|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 10% | Procedural justice salary calculation median + P @ 14% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 14% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £54,034 | National KFH | £5,403.40 | £59,437 | At pay point 0 (bottom) £59,437 - £50,160 = £9,277 | 18.5% | £50,160 Yr1 5.82% Yr2 5.82% Yr3 5.82% | £53,079 | £56,169 | £59,438 | £50,160 Yr1 8.09% Yr2 8.09% Yr3 8.09% | £50,160 x -2.1% = £49,107 x 8.09% = £53,079 | £53,079 x -2.1% = £51,965 x 8.09% = £56,169 | £56,169 x -2.1% = £54,989 x 8.09% = £59,438 |
| Top of the scale | £54,034 | National KFH I | £5,403.40 | £59,437 | Pay point 3 (top) £59,437 - £54,408 = £5,029 | 9.2% | £54,408 Yr1 2.99% Yr2 2.99% Yr3 2.99% | £56,035 | £57,710 | £59,436 | £54,408 Yr1 5.20% Yr2 5.20% Yr3 5.20% | £54,408 x -2.1% = £53,265 x 5.20% = £56,035 | £56,035 x -2.1% = £54,858 x 5.20% = £57,711 | £57,711 x -2.1% = £56,499 x 5.20% = £59,437 |

Figure 41: Chief Inspectors' procedural justice pay calculation P @ 14%

| CHIEF INSPECTORS' PAY SCALE | | | | | | | | | | | | | | |
|-----------------------------|---------------------------------------|-----------------|----------------|--|--|------------------------|---|---------|---------|---------|--|--|--|--|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 14% | Procedural justice salary calculation median + P @ 14% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 14% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £63,855 | National KFH | £8,940 | £72,795 | At pay point 1 (bottom) £72,795 - £55,521 = £17,274 | 31.1% | £55,521 Yr1 9.45% Yr2 9.45% Yr3 9.45% | £60,768 | £66,510 | £72,796 | £55,521 Yr1 11.7% Yr2 11.7% Yr3 11.7% | £55,521 x -2.1% = £54,355 x 11.7% = £60,715 | £60,715 x -2.1% = £59,440 x 11.7% = £66,394 | £66,394 x -2.1% = £65,000 x 11.7% = £72,605 |
| Top of the scale | £63,855 | National KFH | £8,940 | £72,795 | Pay point 3 (top) £72,795 - £57,804 = £14,991 | 25.9% | £57,804 Yr1 7.99% Yr2 7.99% Yr3 7.99% | £62,423 | £67,410 | £72,796 | £57,804 Yr1 10.31% Yr2 10.31% Yr3 10.31% | £57,804 x -2.1% = £56,590 x 10.31% = £62,425 | £62,425 x -2.1% = £61,114 x 10.31% = £67,414 | £67,414 x -2.1% = £65,999 x 10.31% = £72,803 |

Figure 42: Chief Inspectors' procedural justice pay calculation P @ 10%

| CHIEF INSPECTORS' PAY SCALE | | | | | | | | | | | | | | |
|-----------------------------|---------------------------------------|-----------------|----------------|--|---|------------------------|---|---------|---------|---------|--|--|--|--|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 10% | Procedural justice salary calculation median + P @ 10% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 10% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £63,855 | National KFH | £6,385.50 | £70,241 | At pay point 0 (bottom) £70,241 - £55,521 = £14,720 | 26.5% | £55,521 Yr1 8.155% Yr2 8.155% Yr3 8.155% | £60,049 | £64,946 | £70,242 | £55,521 Yr1 10.48% Yr2 10.48% Yr3 10.48% | £55,521 x -2.1% = £54,355 x 10.48% = £60,051 | £60,051 x -2.1% = £58,790 x 10.48% = £64,952 | £64,952 x -2.1% = £63,588 x 10.48% = £70,252 |
| Top of the scale | £63,855 | National KFH I | £6,385.50 | £70,241 | Pay point 3 (top) £70,241 - £57,804 = £12,437 | 21.5% | £57,804 Yr1 6.71% Yr2 6.71% Yr3 6.71% | £61,683 | £65,822 | £70,238 | £57,804 Yr1 9.00% Yr2 9.00% Yr3 9.00% | £57,804 x -2.1% = £56,590 x 9.00% = £61,683 | £61,683 x -2.1% = £60,388 x 9.00% = £65,823 | £65,823 x -2.1% = £64,441 x 9.00% = £70,240 |

Figure 43: Superintendents' procedural justice pay calculation P @ 14%

| SUPERINTENDENTS' PAY SCALE | | | | | | | | | | | | | | |
|----------------------------|---------------------------------------|----------------------|----------------|--|--|------------------------|---|---------|---------|----------|--|--|--|---|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 14% | Procedural justice salary calculation median + P @ 14% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 14% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £76,662 | National KFH level 1 | £10,733 | £87,395 | At pay point 1 (bottom) £87,395 - £66,789 = £20,606 | 30.9% | £66,789 Yr1 9.38% Yr2 9.38% Yr3 9.38% | £73,054 | £79,906 | £87,401 | £66,789 Yr 1 11.71% Yr2 11.71% Yr3 11.71% | £66,789 x -2.1% = £65,386 x 11.71% = £73,043 | £73,043 x -2.1% = £71,509 x 11.71% = £79,883 | £79,883 x -2.1% = £78,205 x 11.71% = £87,363 |
| Top of the scale | £90,664 | National KFH level 2 | £12,693 | £103,357 | Pay point 3 (top) £103,357 - £78,888 = £24,469 | 31.0% | £78,888 Yr1 9.42% Yr2 9.42% Yr3 9.42% | £86,319 | £94,451 | £103,348 | £78,888 Yr1 11.69% Yr2 11.69% Yr3 11.69% | £78,888 x -2.1% = £77,231 x 11.69% = £86,260 | £86,260 x -2.1% = £84,448 x 11.69% = £94,320 | £94,320 x -2.1% = £92,340 x 11.69% = £103,134 |

Figure 44: Superintendents' procedural justice pay calculation P @ 10%

| SUPERINTENDENTS' PAY SCALE | | | | | | | | | | | | | | |
|----------------------------|---------------------------------------|-----------------|----------------|--|---|------------------------|---|---------|---------|---------|--|--|--|--|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 10% | Procedural justice salary calculation median + P @ 10% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 10% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £76,662 | National KFH | £7,666.20 | £84,328 | At pay point 0 (bottom) £84,328 - £66,789 = £17,539 | 26.3% | £66,789 Yr1 8.08% Yr2 8.08% Yr3 8.08% | £72,186 | £78,018 | £84,322 | £66,789 Yr1 10.40% Yr2 10.40% Yr3 10.40% | £66,789 x -2.1% = £65,386 x 10.40% = £72,187 | £72,187 x -2.1% = £70,671 x 10.40% = £78,020 | £78,020 x -2.1% = £76,382 x 10.40% = £84,326 |
| Top of the scale | £90,664 | National KFH I | £9,066.40 | £99,730 | Pay point 3 (top) £99,730 - £78,888 = £20,842 | 26.4% | £78,888 Yr1 8.13% Yr2 8.13% Yr3 8.13% | £85,302 | £92,237 | £99,735 | £78,888 Yr1 10.45% Yr2 10.45% Yr3 10.45% | £78,888 x -2.1% = £77,231 x 10.45% = £85,302 | £85,302 x -2.1% = £83,511 x 10.45% = £92,238 | £92,238 x -2.1% = £90,301 x 10.45% = £99,737 |

Figure 45: Chief Superintendents' procedural justice pay calculation P @ 14%

| CHIEF SUPERINTENDENTS' PAY SCALE | | | | | | | | | | | | | | |
|----------------------------------|---------------------------------------|-----------------|----------------|--|---|------------------------|---|---------|----------|----------|--|--|---|---|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 14% | Procedural justice salary calculation median + P @ 14% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 14% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £106,555 | National KFH | £14,918 | £121,473 | At pay point 1 (bottom) £121,473 - £82,779 = £38,694 | 46.7% | £82,779 Yr1 13.64% Yr2 13.64% Yr3 13.64% | £94,070 | £106,901 | £121,483 | £82,779 Yr1 16.05% Yr2 16.05% Yr3 16.05% | £82,779 x -2.1% = £81,041 x 16.05% = £94,048 | £94,048 x -2.1% = £92,073 x 16.05% = £106,850 | £106,850 x -2.1% = £104,606 x 16.05% = £121,396 |
| Top of the scale | £106,555 | National KFH | £14,918 | £121,473 | Pay point 3 (top) £121,473 - £87,327 = £34,146 | 39.1% | £87,327 Yr1 11.63% Yr2 11.63% Yr3 11.63% | £97,483 | £108,820 | £121,476 | £87,327 Yr1 14.00% Yr2 14.00% Yr3 14.00% | £87,327 x -2.1% = £85,493 x 14.00% = £97,462 | £97,462 x -2.1% = £95,415 x 14.00% = £108,774 | £108,774 x -2.1% = £106,489 x 14.00% = £121,398 |

Figure 46: Chief Superintendents' procedural justice pay calculation P @ 10%

| CHIEF SUPERINTENDENTS' PAY SCALE | | | | | | | | | | | | | | |
|----------------------------------|---------------------------------------|-----------------|----------------|--|--|------------------------|---|---------|----------|----------|--|--|---|---|
| | Median of appropriate benchmark group | Benchmark group | P factor @ 10% | Procedural justice salary calculation median + P @ 10% | Current shortfall based on 2018 salaries | Current shortfall as % | 3 year deal needed to achieve benchmark + P @ 10% (not taking into account inflation) | Yr1 | Yr2 | Yr3 | 3 year deal needed if CPI inflation is also taken into account | Yr1 | Yr2 | Yr3 |
| Bottom of the scale | £106,555 | National KFH | £10,656 | £117,211 | At pay point 0 (bottom) £117,211 - £82,779 = £34,432 | 41.6% | £82,779 Yr1 12.29% Yr2 12.29% Yr3 12.29% | £92,953 | £104,376 | £117,204 | £82,779 Yr1 14.70% Yr2 14.70% Yr3 14.70% | £82,779 x -2.1% = £81,041 x 14.70% = £92,954 | £92,954 x -2.1% = £91,002 x 14.70% = £104,379 | £104,379 x -2.1% = £102,187 x 14.70% = £117,208 |
| Top of the scale | £106,555 | National KFH | £10,656 | £117,211 | Pay point 3 (top) £117,211 - £87,327 = £29,884 | 34.2% | £87,327 Yr1 10.31% Yr2 10.31% Yr3 10.31% | £96,330 | £106,262 | £117,218 | £87,327 Yr1 12.68% Yr2 12.68% Yr3 12.68% | £87,327 x -2.1% = £85,493 x 12.68% = £96,334 | £96,334 x -2.1% = £94,311 x 12.68% = £106,269 | £106,269 x -2.1% = £104,038 x 12.68% = £117,230 |

15 Annex 9 Peer reviewed publications based on PFEW research studies 2018

Journal articles

Boag-Munroe, F. (2018). Recent Police Recruits' Existing Knowledge of the Police and Organisational Commitment. *Journal of Police and Criminal Psychology*. Advance online publication <https://doi.org/10.1007/s11896-018-9273-1>

Houdmont, J., Elliott-Davies, M., & Donnelly, J. (2018). Single crewing in English and Welsh policing: frequency and associations with violence towards and injuries in officers. *Policing and Society*, 1-14.

Houdmont, J., Elliott-Davies, M., & Donnelly, J. (2018). Leaveism in English and Welsh police forces: baseline reference values. *Occupational Medicine*, 68(9), 593-599.

Professional conference presentations (Division of Occupational Psychology, British Psychological Society)

Elliott-Davies, M. & Houdmont, J. (2019). Seeking mental health support and the decision to disclose: A study of disclosure behaviours in English and Welsh Policing. Paper to be presented at the British Psychological Society's Division of Occupational Psychology Annual Conference, Chester 9-11 January 2019.

Wellington, N. (2019). Leaveism and Physical Health: Do all components of leaveism, as well as sickness absence and presenteeism have an influence on health in policing. Paper to be presented at the British Psychological Society's Division of Occupational Psychology Annual Conference, Chester 9-11 January 2019.

Chandler, N. (2019). Does the professional development of Police Detectives impact upon their job stressfulness and job satisfaction? Paper to be presented at the British Psychological Society's Division of Occupational Psychology Annual Conference, Chester 9-11 January 2019.