



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)

January 2018



Police Federation
of England and Wales
Ffederasiwn Heddlu
Lloegr a Chymru



5 February 2018

To: The Chair of the Police Remuneration Review Body, Mr David Lebrecht.

Dear Mr Lebrecht,

We are pleased to enclose the fourth 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 (PSA).

On receipt of this year's remit letter, we wrote to you regarding the contents. We are deeply concerned that the impression from the remit letter is that the National Police Chiefs' Council plans for pay reform are more advanced than we believe to be the case. We believe that puts both the PRRB and the staff associations in an invidious position.

Our analysis of the economic circumstances this year leads us to insist that you consider an uplift for all officers of 3.4%, in line with inflation. Additionally, the 1% element of last year's uplift that was unconsolidated should now be consolidated, and should not affect this year's uplift. The Home Secretary must act on the independent advice of the PRRB: doing otherwise last year has undermined the credibility of the process, and the mechanisms that this government introduced.

With regard to the four specific matters in the remit letter, we find it difficult to comment on how the uplift would support NPCC plans, given the lack of any written proposals for pay restructuring. We believe officers must not be penalised for the NPCC lack of progress. We believe apprenticeship pay must be set within the existing pay scales, and have seen no evidence to suggest we should change the position we stated last year. The NPCC have failed to provide proposals or time-limited targeted pay, despite the fact they have asked for targeted pay to be included two years in a row in the remit letter. Finally, in absence of any detail regarding the NPCC pay reforms and proposed timetable, we cannot provide detailed observations.

A handwritten signature in black ink, appearing to read 'A. Fittes', with a long horizontal stroke extending to the right.

Andy Fittes, General Secretary of PFEW

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

Dan Murphy , National Secretary of PSA

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1 Chapter 1 Executive Summary

Process

1.1.1 There are a number of matters we raise in this submission that are outside the scope of the remit letter. These are 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).

1.1.2 These are:

- The lack of transparency in the remit letter process, and the inaccurate assumptions contained in the remit letter, which we believe implies National Police Chiefs' Council (NPCC) plans for pay reform are further progressed than we understand them to be. We feel it would be entirely inappropriate for officers to be penalised for this. We take note that the remit letter states any award must be considered "*in the context of how it will support overarching NPCC proposals and timetable for a new pay structure*". For four years now the NPCC have implied that sizable uplifts might scupper their plans: that savings must be built up in order to pay for the changes coming; and that one way to do this is to make uplifts unconsolidated. Given the NPCC have not provided a firm timescale and plans, we ask when this line of argument will end? It is not palatable to officers who should not suffer financial loss for the NPCC's failure to make progress.

- The lack of engagement by the NPCC, including a failure to provide written proposals; inappropriate delegation of attendance at pre-arranged statutory meetings to staff who are not familiar with the process and who do not have the requisite level of authority; a failure to bring discussions to the appropriate fora; and a lack of engagement in the Police Consultative Forum in particular, even though the matters raised in last year's PRRB submission by the NPCC implied that these would be worked through in that particular forum.
- The confusion between the statutory remits of the College of Policing Regulatory Consultative Group (CRCG), the Police Advisory Board of England and Wales (PABEW) & the PRRB, and the use of such confusion to step away from engagement with the staff associations. For example, there have been a number of occasions when matters such as probation periods have not gone to the rightful body (the PABEW) for consultation.

Last year's unconsolidated element of the uplift

- 1.1.3 Last year the PRRB recommended a 2% across the board uplift for officers. The Home Secretary and government decided that this be 1% consolidated and 1% unconsolidated. This undermines the PRRB process that the government introduced only 4 years ago; creates uncertainty for officers and Human Resources departments; and penalises officers for the NPCC lack of progress. Until the government's decision, the NPCC were the only body who had ever asked for the uplift to be unconsolidated (in their second submission to the PRRB, in 2015), and we believe their rationale was in part to be able to reclaim and redistribute uplifts, should it seem necessary in order to fit the plans for pay reform.
- 1.1.4 Further, the impression given to the public was that officers had a 2% uplift last year. This was recommended at a time when public support for the police and recognition of their work was high (following terrorist attacks such as that on Westminster Bridge; Manchester; and Borough Market). It would be shameful if that award were now removed.
- 1.1.5 We believe that the 1% of last year's uplift that was not consolidated must now be consolidated, and must not be considered to be part of this year's settlement.

The remit letter

(1) How to apply the pay award for 2018/19

- 1.1.6 As always we make a case for an uplift that is based on evidence of the economic impact of wage freezes and the recent pay cap on our members; evidence of officers' attitudes to pay, and their reporting of their workload; and data regarding the recruitment and retention of officers.
- 1.1.7 Since 2010, and even allowing for the 2017 settlement to be fully consolidated, up until 2017 pay settlements for the police have totalled 8.5%, whereas cumulative Retail Price Index (RPI) inflation has been 25%. This leaves a gap for officers of 16.5% below RPI (or on a Consumer Price Index calculation, 9.8%). Officers have therefore already fallen significantly behind.
- 1.1.8 There is a body of evidence from the Bank of England's Monetary Policy Committee and others that inflation is set to continue to be at a forecast of 3.4%. We therefore recommend that officers are awarded an across the board increase of 3.4%, so that they suffer no further loss.
- 1.1.9 Going forward, we believe that even a relaxation of the government's pay cap to 2% is unsustainable, and will not attract and retain the right calibre of officers.

(2) NPCC proposals for officer apprenticeship pay

1.1.10 On 22nd January the NPCC notified those present at a Police Consultative Forum that they intend to recommend a £18,000 starting salary for apprenticeship officers. Notwithstanding the lack of prior discussion, and the fact that this figure was fielded only two weeks before the PRRB submissions are due, we have noted a number of concerns in this submission.

1.1.11 We believe the figure of £18,000 is a derisory offer, which would cause considerable hardship to any apprentice taking it up.

1.1.12 The method (as we understand it) by which this figure has been derived is fundamentally flawed. For example, we believe level 4 apprenticeship pay has been included in the benchmarking, when the scheme will be a level 6 apprenticeship scheme.

1.1.13 The method does not properly take into account appropriate external benchmarking groups.

1.1.14 The method does not take into account internal relativities, and creates issues regarding distributive justice. For example we believe there has been an undue focus on one feature of the apprenticeship scheme (the abstraction time) without taking into account the elements of the other new entry routes to try to ensure fairness.

- 1.1.15 The method does not take into account the impact on policing as a whole. For example, the stated intent of apprenticeships is to be increase diversity by being more attractive to BME and female candidates: and yet the offer to these very candidates is likely to be at least £2,169 lower than to other candidates. This will create significant difficulties for the employer in terms of equality of pay. We believe the appropriate test of fairness will be whether incumbents in the role of Constable are doing a similar level of tasks (e.g. are warranted). We believe the NPCC may be open to claims of indirect discrimination.
- 1.1.16 The NPCC has failed to address issues of pay progression, as directed by the PRRB.
- 1.1.17 We therefore see no reason to move away from our recommendation in last year's submission, that apprentices should be incorporated within the existing pay scale.

(3) NPCC proposals for time-limited, targeted payments to address specific recruitment and retention problems

1.1.18 We are dumbfounded at the inclusion of this in the remit letter, as the NPCC have failed to provide any proposals, either in draft or final. We therefore cannot comment.

(4) Observations on NPCC proposals including the timetable

1.1.19 We are unable to comment on proposals and a timetable that have not, as yet, been provided.

1.1.20 We welcome the PRRB's instructions to the NPCC dated 3rd November 2017 regarding the evidence expected from the employer.

1.1.21 We believe it is essential – to recreate positive employee relations and to enable the PRRB to fulfil its function properly – that the NPCC now puts the requisite effort and resource into attending to the matters that the PRRB has asked it to: namely the production of appropriate evidence where change is requested, and full engagement in the PCF process.

2 Chapter 2 Introduction

2.1.1 This submission has been prepared by the Police Federation of England and Wales (PFEW), and the Police Superintendents' Association (PSA)¹ for the Police Remuneration and Review Body (PRRB). Separate submissions may be made in part, dependent on the scope of the remit letter.

2.1.2 This is the fourth year during which the PRRB has operated. In preparing our submission, we have taken into the PRRB's broad Terms of Reference; and the remit letter from the Home Secretary to the PRRB Chair, supplied on 7th December 2017.

¹ Any use of the term "We" throughout this document refers to both organisations. The submission has been prepared on behalf of the General Secretary PFEW and National Secretary PSA by the Research and Policy department of the PFEW.

3 Chapter 3 The Home Secretary's remit letter

"Dear David

Police Remuneration Review Body Remit 2018/19

I am writing to ask you to conduct the annual review of police officer pay. In order to promote consistency as we move towards a new pay structure, this year I would ask that this includes chief police officers. This will ensure a consistent approach is taken across all ranks during the transition to a new framework.

The Chief Secretary to the Treasury wrote to you in September setting out the Government's overall approach to pay. That letter confirmed that the Government has adopted a more flexible approach to public sector pay, to address any areas of skills shortages and in return for improvements to public sector productivity. The last Spending Review budgeted for one per cent average basic pay awards, in addition to progression pay for specific workforces, and there will still be a need for pay discipline over the coming years to ensure the affordability of the public service and the sustainability of public sector employment; review bodies should continue to consider affordability when making their recommendations.

For this pay round, I see PRRB continuing to play a key role in reviewing the next stage of NPCC's plans for a new reward structure work and providing observations on the first tranche of proposals put forward by NPCC, who will provide the bulk of the evidence this year.

In light of this, I refer to the PRRB the following matters for recommendation for 2018/19:

- 1. how to apply the pay award for 2018/19 for police officers of all ranks, including chief officers, in accordance with the Chief Secretary's letter and in the context of how it will support overarching NPCC proposals and timetable for a new pay structure;*

2. NPCC proposals for police officer apprenticeship pay, which will need to be considered outside of the usual reporting timetable - as you are aware, apprenticeships will be introduced in forces next year and we are expecting sector agreement on linked pay proposals early in the New Year. NPCC have committed to circulate proposals to partners in good time so that you are able to consider them alongside the main body of written evidence. To allow adequate time for consultation before any changes are applied, it will be important to obtain PRRB's observations by the end of April 2018 in advance of your main report;

3. to review final NPCC proposals for time-limited, targeted payments to address specific recruitment and retention pressures; and

4. to provide observations on NPCC reform proposals, including the timetable.

As in previous years, in considering the appropriate level of pay for police officers I would 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.

Thank you for your continued hard work in this important area and I look forward to receiving your recommendations no later than 31 May 2018."

3.1 The Home Secretary's remit letter – our concerns

3.1.1 I trust it is evident from the previous submissions that we (the staff associations) have delivered that we have engaged in the pay review body process with commitment and diligence. We have endeavoured to collect and present detailed evidence on all the points we have been asked to consider each year.

- 3.1.2 Four years ago we did not want the previous mechanism for negotiating pay – the Police Negotiation Board – to be removed, as we feared that this would lead to a lack of voice for our members. Nonetheless, since commencing participation in the new Police Remuneration Review Body back in 2014, we have tried to ensure that the process works. This has included investing time and effort in a number of supporting fora, including the voluntary Police Consultative Forum.
- 3.1.3 However, as we enter the period during which we present to you our fourth submission, concerns regarding the pay review process are mounting. We sense from members an exasperation and sense of unfairness. We do not believe these are of the PRRB’s own making, but it is becoming clear that if the process as a whole cannot be made to work better, then unfortunately the PRRB, as the “front end” of the system that is visible to our members, will be perceived to be failing them.
- 3.1.4 There are two main reasons for this. The first is the failure of the Home Secretary to fully accept the PRRB recommendation last year, and award a 2% consolidated uplift to all members. We will return to this point later in the submission. However it is worth noting that the effect has been to make the PRRB seem a toothless body, and to throw the Home Secretary’s commitment to it into question.
- 3.1.5 The second reason is that we have had little sight during the last year of any progress the NPCC has made towards a new pay structure, and yet the remit letter this year revolves around the idea that the pay award should *“support overarching NPCC proposals and timetable for a new pay structure”*. This leaves us in an intolerable position, which the PFEW wrote to you about on receipt of the remit letter. (See annex A). How can any of us be expected to make judgements as to whether the pay award supports the overarching proposals and timetable if we do not know what these are?

3.1.6 We are unsure what the reasons are for this. A very small number of meetings including the staff associations occurred prior to last year's submission, during which the NPCC outlined plans for changes such as an Advanced Practitioner model, a number of organisational levels, and apprenticeships. However, these were outline proposals with no link at that stage to pay. No method whereby such job levels would be evaluated and pay linkages made has ever been brought to an appropriate forum. To date, the staff associations have been appraised of data collection only, and not invited to engage in consultation over the use of such data, or what conclusions might be drawn.

3.1.7 In the last year, since the last submissions were made, no further such meetings to discuss changing organisational structures and related revisions to the pay structures have been held, including the General Secretary of the PFEW and National Secretary of the PSAEW respectively. There have been a small number of informal meetings to discuss possible data requirements for PRRB submissions between researchers only: but no written methodology has been provided, nor proposals, and nothing has been brought to the formal meetings between the NPCC, the General Secretary PFEW and Secretary PSAEW, and other key stakeholders such as the APCC.²

² A number of annexes to the NPCC submission were provided on the 31st January 2018. It has not been possible in the time between that and submission of this document on 5th February to provide a full written analysis. However, the documents provided appear to be the data output from focus groups, rather than proposals.

- 3.1.8 It may be that the NPCC have proposals ready, which they have chosen not to share with us via the PCF or other available pay and conditions fora. Alternatively, it may be that whoever drafted the remit letter on behalf of the Home Secretary was led to believe that plans relating to pay were more advanced, and had been shared more widely, than has been the case. But whatever the reason, the impact on employee relations can only be negative.
- 3.1.9 Whatever the cause, we believe it would be entirely inappropriate to disadvantage officers in any way because of the lack of progress made by the NPCC. We expect that the NPCC will deploy the argument that they have in the past – that officers' uplifts should not be high enough to prevent money being available for reform in the future, and that pay should not be consolidated so that if needed it can be redistributed in accordance with future workforce plans. But we have heard that same argument for four years now. It must not be used as a way to prevent officers receiving an increase. We understand the NPCC position that enacting change may need more money. But any reform timetable needs to be known in order to be properly costed. As far as we are aware, the detailed timescales are not yet set out. Given that the NPCC have not specified either what will be done, or when it will be done by, we assume that they have not yet fully costed the changes they intend to propose.
- 3.1.10 In our meetings with the PRRB, the PRRB members have been supportive of the notion of co-operation between stakeholder organisations, recognising that this is necessary for positive industrial relations. Unfortunately this has not translated into goodwill and action on the part of the NPCC.

4 Chapter 4 Last year's (2017's) uplift – 1% unconsolidated portion

- 4.1.1 We welcome the PRRB's recommendation in 2017 of a 2% uplift for all officers. We recognise that it must have been difficult for the PRRB to openly challenge the government's savings driven line, that public sector pay be capped at 1%, and we are grateful to them for doing so.
- 4.1.2 Unfortunately, in deciding that the 2% uplift was split into 1% consolidated and 1% unconsolidated, the Home Secretary and government have undetermined the very process that they themselves introduced to policing only 4 years ago. It has put into question the PRRB's authority and credibility, and it has caused a very real concern on the part of the staff associations and their members that officers are being given no voice or proper recognition of what they do. The Home Secretary's decision has discredited the process, and this must now be rectified.
- 4.1.3 On a very practical level, the fact that part of last year's pay award was unconsolidated has caused confusion amongst both recipients and Human Resource departments. Following the announcement the staff associations received numerous requests from officers for clarification. HR departments were initially unsure as to whether the unconsolidated element would be pensionable, and so on. If an element of pay remains unconsolidated this year, the confusion will only increase.
- 4.1.4 Unconsolidated awards mean that officers have struggled to get mortgages, as many lenders will not take this element into account. It impacts on officers' stability, and their ability to provide for their families.

- 4.1.5 We believe that an unconsolidated award penalises officers for the NPCC's inability to provide a clear plan for the future. We believe that the NPPC may wish to claw back the unconsolidated element of pay in order to fund their plans: and for as long as these plans are unformed, the uncertainty for officers may be prolonged. This is unfair.
- 4.1.6 Our economic analysis suggests that even 2% last year still leaves officers significantly behind the rate of inflation.
- 4.1.7 The 1% unconsolidated element from last year must be treated as part of last year's uplift, not this year's. If it is merely consolidated and treated as part of this year's then officers will actually have less take home pay, as it will now be subject to deductions for pensions etc.
- 4.1.8 We know that last year's recommendation came at a time when the dangerous and critical work of police officers was high in the public consciousness. The terrorist attacks on Westminster Bridge, Manchester, and Borough Market, and the Grenfell fire tragedy highlighted the perilous work of the emergency services. Quite rightly, these were followed by an outpouring of public support for, and gratitude to, the police. It would be shameful if the public were given the impression officers got 2% last year, only for a part of that to now be removed, or treated as part of this year's award.
- 4.1.9 It must be remembered that for every such event that occurs, there are countless others that are prevented. The dangerous work goes on day after day, and the work done by officers this year is no less arduous than last. Officers suffer physical threat, harrowing experiences, and often long term welfare effects. We believe that this must be reflected in their reward package. We believe that is what the public would want.

4.2 **Recommendation: last year's unconsolidated element**

4.2.1 The 1% unconsolidated element from last year must now be consolidated and treated as entirely separate to this year's pay award. It is morally right to do so: the public have been led to believe officers had a 2% uplift last year. The Home secretary needs to show her support for the pay review process that her government introduced. Officers must have a system for setting pay that they can have confidence in, and must not be penalised for other's failures.

5 Chapter 5 The size of the uplift for 2018

5.1.1 As ever, we make our case for an uplift based on evidence. We draw on three main sources:

- Evidence of the economic impact of wage freezes and the 1% pay cap on our members;
- Evidence of officers' attitudes to pay, the impact on morale, and officers' reporting of their working experiences such as workload;
- Data from the Home Office regarding changes in the recruitment and retention of officers.

Uplift evidence: Economic analysis

5.2 The political context

5.2.1 On 12 September 2017 the government announced its intention to move away from the 1% basic public sector pay policy for this 2018-19 pay round onwards. The Chief Secretary to the Treasury's announcement, reaffirmed in the Autumn Budget report published on 22 November 2017, makes it clear that future pay awards would ensure "the overall pay award is fair to public sector workers, as well as to taxpayers, and reflects the vital contribution they make to delivering high quality public services".³

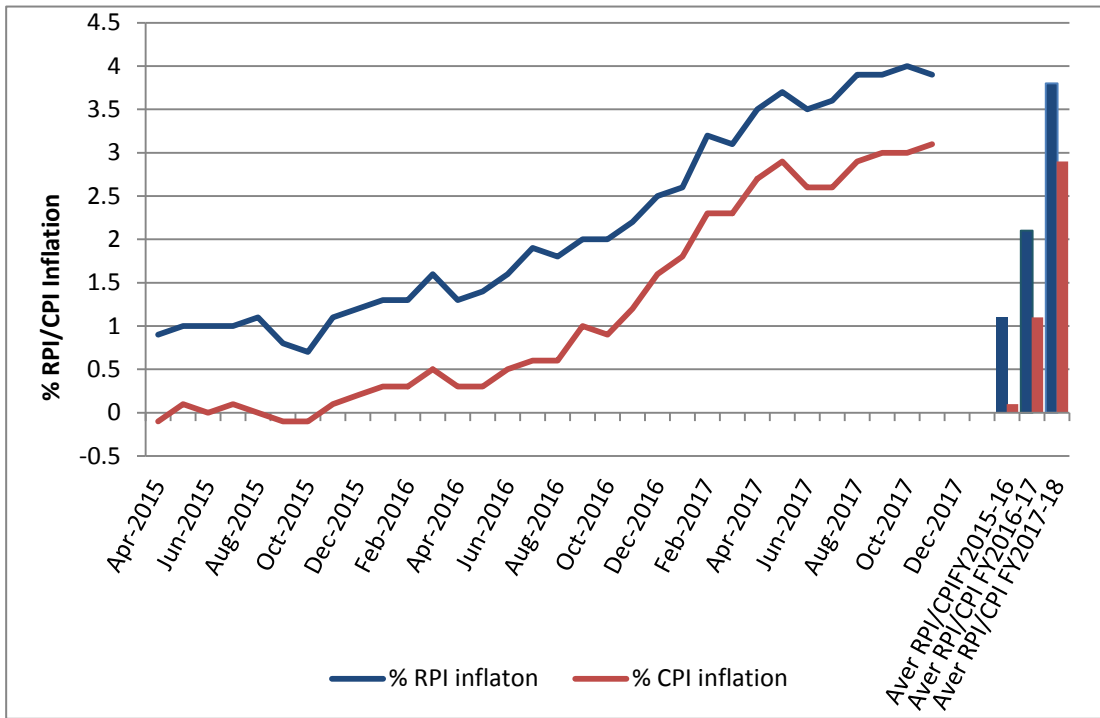
5.2.2 While we welcome this move, as noted we were disappointed that the Home Secretary failed to award last year's PRRB recommendation of a 2% increase as consolidated pay.

³ Chief Secretary to the Treasury statement, HM Treasury, 12 September 2017 at the time of the announcement of the pay award for police and prison officers for 2017-18, <https://www.gov.uk/government/news/public-sector-pay-awards-confirmed-for-201718>. See also para 6.27 in Autumn Budget 2017 Report produced by HM Treasury to accompany the Chancellor's Autumn Budget Speech, 22 November 2017.

5.3 Economic context: past and future trends

- 5.3.1 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. Even the PRRB recommended 2% award from September 2017 was well below the September inflation rate of 3.9% for RPI and 2.9% for CPI. The shortfall is even greater when account is taken of the fact that the consolidated award still represents only 1% on officers' pay scales going forward.
- 5.3.2 Graph 5.1 illustrates the dramatic impact of inflation even over the last year. Since we submitted our evidence to the review body in November 2016 RPI inflation has risen steeply from 2.2% to 3.9% in November 2017, and CPI from 1.2% to 3.1%.
- 5.3.3 RPI averaged 1.2% in FY2015-16 and 2.1% in FY2016-17. It is averaging 3.8% so far in FY2017-18.
- 5.3.4 CPI has also risen noticeably from an average of 0.1% in FY2015-16 to 2.9% so far in FY2017-18.

Graph 5.1: Rise in inflation (RPI and CPI) since April 2015, and annual average since FY2015-16



- 5.3.5 The prolonged period of public sector pay restraint has coincided with stronger pay growth in the private sector resulting in a widening pay gap.
- 5.3.6 The most recent average weekly earnings reported by the Office for National Statistics (ONS) show regular pay in the 3 months to October 2017 increasing by 2.5% in the private sector, but only 1.8% in the public sector.⁴
- 5.3.7 More recently XpertHR published a whole economy average earnings forecast of 2.6% (compared to 2.3% currently) by the end of 2018 based on the estimates of 11 independent forecasters.⁵
- 5.3.8 The Bank of England's Monetary Policy Committee (MPC) has already started to take action to raise the Bank Rate in the face of rising inflation in general. They raised base rates by 25 basis points to 0.5%, the first for a decade, and signalled the likelihood of further rises in 2018.⁶ The National Institute for Economic and Social Research (NIESR) has suggested the Bank will "raise rates every six months until the Bank Rate reaches 2%".⁷

⁴ ONS, *UK Labour Market*, 13 December 2017, p16 link to supplementary table EARN01. Available from ONS website,

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/uklabourmarket/december2017>

⁵ XpertHR, *Average weekly earnings* <https://www.xperthr.co.uk/indicators/average-earnings/16285/?keywords=average+earnings>

⁶ Bank of England, *Monetary Policy Summary and minutes of the Monetary Policy Committee meeting ending on 1 November 2017*, 2 November 2017, <http://www.bankofengland.co.uk/publications/Pages/news/2017/007.aspx>

⁷ National Institute for Economic and Social Research, *Press Note 'First rate increase in 10 years' Our Comment on MPC decision*, 2 November 2017, <https://www.niesr.ac.uk/media/niesr-press-note-%E2%80%98first-rate-increase-10-years%E2%80%99-our-comment-mpc-decision-13116>

5.3.9 While some of the inflation comes from the cost of imports, the MPC have identified that the rise is also due to job market pressures. They have noted that spare capacity in the economy as measured by the percentage unemployed continues to reduce. They also considered these factors would be “likely to encourage wage pressures to build” which would in turn fuel “underlying domestic inflationary pressures”.⁸

5.3.10 The Bank’s November Inflation Report further stated that “wage growth is projected to increase gradually over 2018, as the tightening labour market starts to put more widespread upward pressure on wage demands and as productivity growth recovers somewhat”.⁹

5.3.11 One member of the MPC provided recent written evidence to the Treasury Select Committee stating that Bank surveys of employment intentions remained high and the unemployment rate continued to fall; measures of under-employment, such as number of people wanting to work more hours, also fell, and at a faster rate than headline unemployment; and data on the type of employment showed that employment was now largely accounted for by full-time employees. He also pointed to “a wider range of pay-related indicators” showing signs of wage growth improvement, such as the Bank’s own Agents’ Survey.¹⁰

⁸ Bank of England, *MPC Minutes, 1 November*, p7.

⁹ Bank of England, *Inflation Report November 2017*, p32
<https://www.bankofengland.co.uk/-/media/boe/files/inflation-report/2017/nov.pdf?la=en&hash=950B4B1481D081CA035FC076CF9FFFFB08F658A6>

¹⁰ Report to the Treasury Committee, *Written evidence submitted by Dr Gertjan Vlieghe*, 21 November 2017,
<http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/treasury-committee/bank-of-england-inflation-reports/written/74054.html>

5.3.12 All this suggests that without substantial public sector pay rises the gap between the public and private sectors will only widen more, with serious implications for public sector recruitment and retention, which is emerging as a common theme across all review body remit groups. Data recently presented by the ONS suggests the difference in mean pay per hour excluding overtime between public and private sector pay as a percentage of private sector pay has fallen from 4% in favour of the public sector in 2010 to 1% in favour of the private sector in 2016.¹¹

5.3.13 And yet, increasing public sector pay in general can have benefits for both the Treasury and the economy as a whole. Recent research by the Institute for Public Policy Research (IPPR) examines the cost to the Treasury of increasing public sector pay in line with either inflation or private sector earnings plus 1%. The two scenarios for increasing public sector pay up to 2019-20 suggested both a considerable return to the Treasury in the form of higher taxes, and lower welfare spending, that would considerably reduce the cost of the pay increases. In addition they conservatively estimated that increasing public sector pay would also generate additional economic growth for the economy as a whole.¹²

¹¹ J Rawlings, *An analysis of the factors that affect public and private sector earnings using ASHE*, ONS, November 2017 presented at A Symposium on Public Sector Pay and Workforce Issues: The End of Austerity? organised by the University of Greenwich Work and Employment Research Unit, 29 November 2017. After controlling for differences in the following characteristics: age, sex, occupation, region of work, contract type, working pattern and job tenure, p7 of slide presentation.

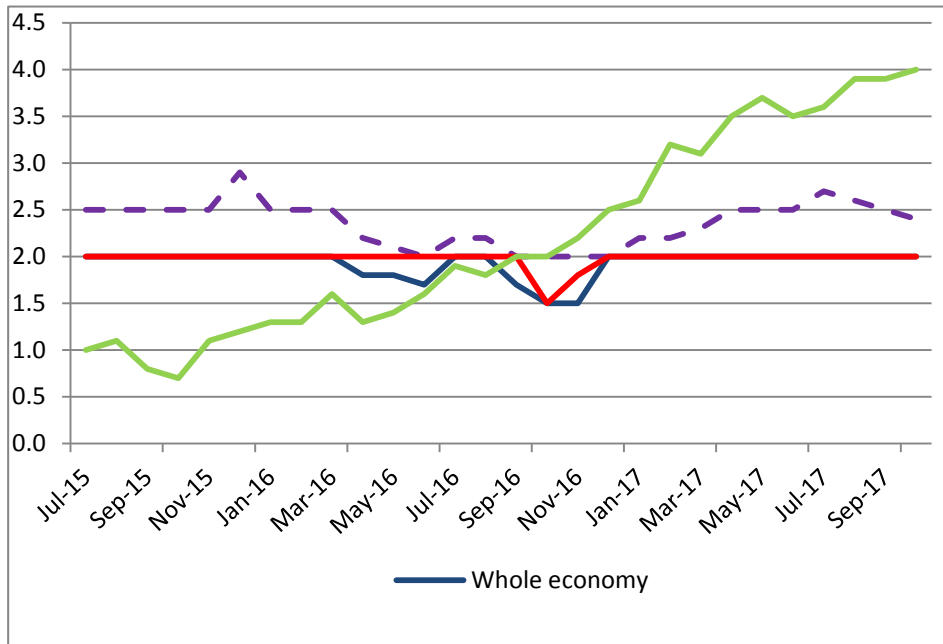
¹² A Stirling and J Dromey, *Uncapped Potential: The fiscal and economic impact of lifting the public sector pay cap*, IPPR, November 2017, p3, <https://www.ippr.org/files/2017-11/uncapped-potential-november2017.pdf>

5.4 Public and private sector pay rises

- 5.4.1 As last year, the following graph showing pay settlements in the whole economy and the private sector over the past two years continues to show settlements clustering around a median of 2%.¹³ However, unlike 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, which seems to give some credence to Bank of England evidence on emerging wage pressure.
- 5.4.2 Most noticeable is the growth in inflation with RPI inflation reaching 3.9% and 4.0% in September and October 2017 respectively. Whereas last year, when we presented evidence, RPI inflation was close to the median pay settlement in the private sector, it is now twice as high as the median settlement.

¹³ *Pay trends November 2017: Pay awards remain static*, 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-2017-pay-awards-remain-static/162638/>; RPI inflation from ONS, *Consumer Price Inflation* Bulletins from August 2015 to November 2017. See complete *Consumer Price Inflation Reference Tables*, November 2017 (Table 37 RPI All Items: 1948 to 2017) on ONS website at <https://www.ons.gov.uk/economy/inflationandpriceindices/datasets/consumerpriceinflation>

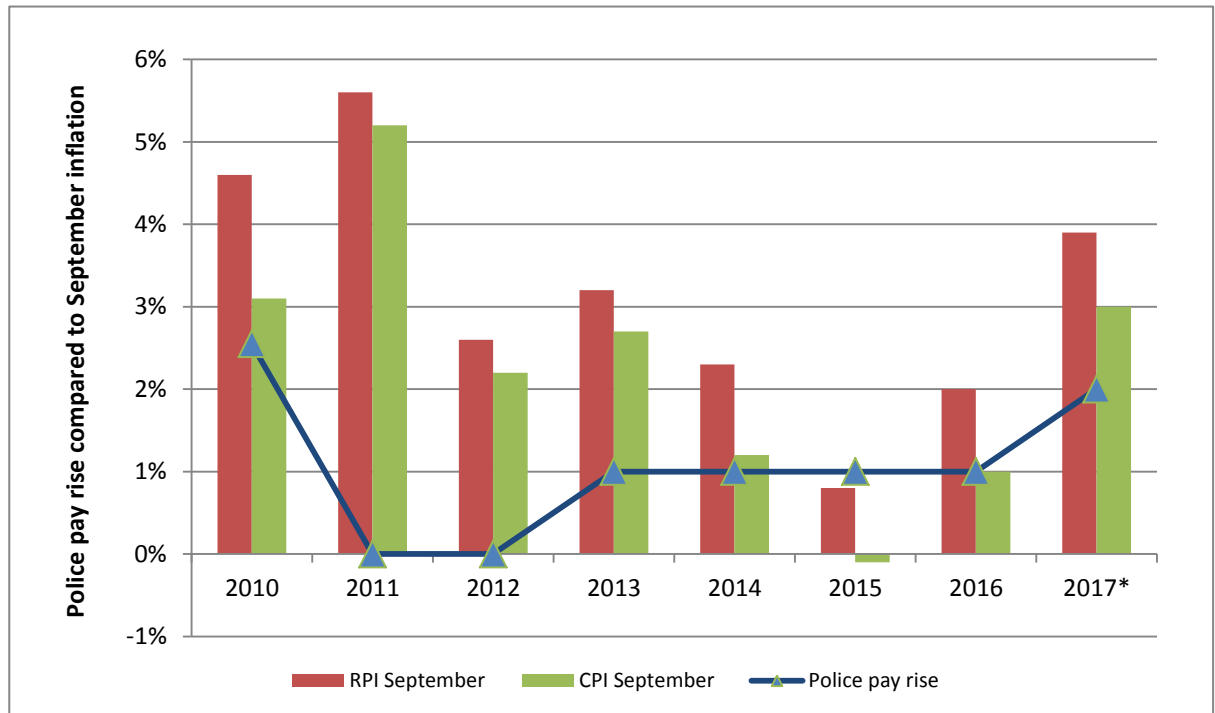
Graph 5.2: Whole economy and private sector median pay settlements and RPI inflation, July 2015 to October 2017 (XpertHR)



5.5 Inflation and the value of police pay

5.5.1 We have updated our analysis of the value of police officer pay settlements since 2010. Even allowing for a 2% settlement in September 2017 (i.e. including 1% non-consolidated) over the whole period to 2017 cumulative pay settlements for the police have totalled 8.55%, whereas cumulative RPI inflation has been 25.0%. This means that the settlements since 2010 have left a gap for officers of 16.5% below inflation. (Even on a CPI measure of inflation the gap is 9.8%).

Graph 5:3: Police officer pay settlements compared to RPI and CPI inflation, 2010-17



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

5.6.1 As in previous years we have used data collected by the Home Office for the most recent financial year 2016-17.

5.6.2 Average nominal pay data from the Earnings and subsequent Police Workforce Censuses for 2010 to 2017 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).

- 5.6.3 Federated Ranks have had continued loss of allowances such as CRTP which disappeared completely from 1st April 2016 following three years of phased reductions from £1,200 in 2012-13 to £900 in 2013-14, £600 in 2014-15 and £300 by 2015-16. This means the loss of a further £300 in 2016-17 for those at the top of scale and in receipt of the payment. Replacement Allowances have also continued to fall as fewer and fewer officers are eligible for this housing payment, which was frozen in 1994. For instance the average amount per constable has fallen from £651 in 2014 to £338 in 2017.
- 5.6.4 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 2016-17 for full-time officers in each rank ,¹⁴ 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.¹⁵
- 5.6.5 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 12% (from £31,601 in 2009-10 to £27,921 in 2016-17).

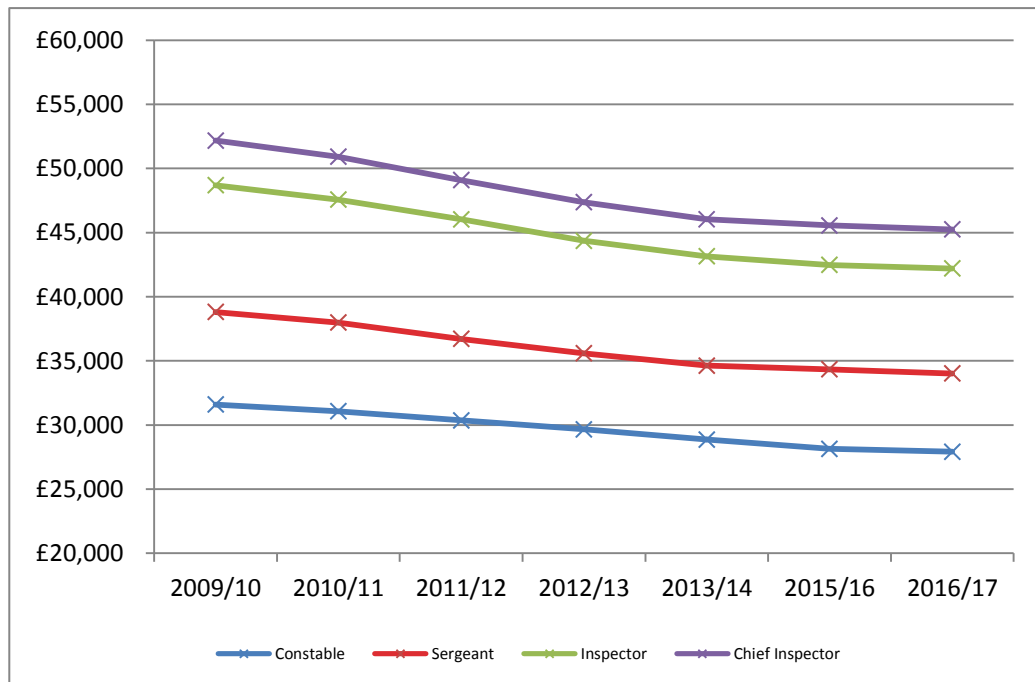
¹⁴ Total pay now includes the following allowance payments: London Weighting, location, overtime, replacement, unsocial hours, overnight, hardship, on-call, other additional allowances, and in the past federated ranks' CRTP and SPP, and superintending ranks' bonus payments. Since the 2010 base data excluded '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.

¹⁵ 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>

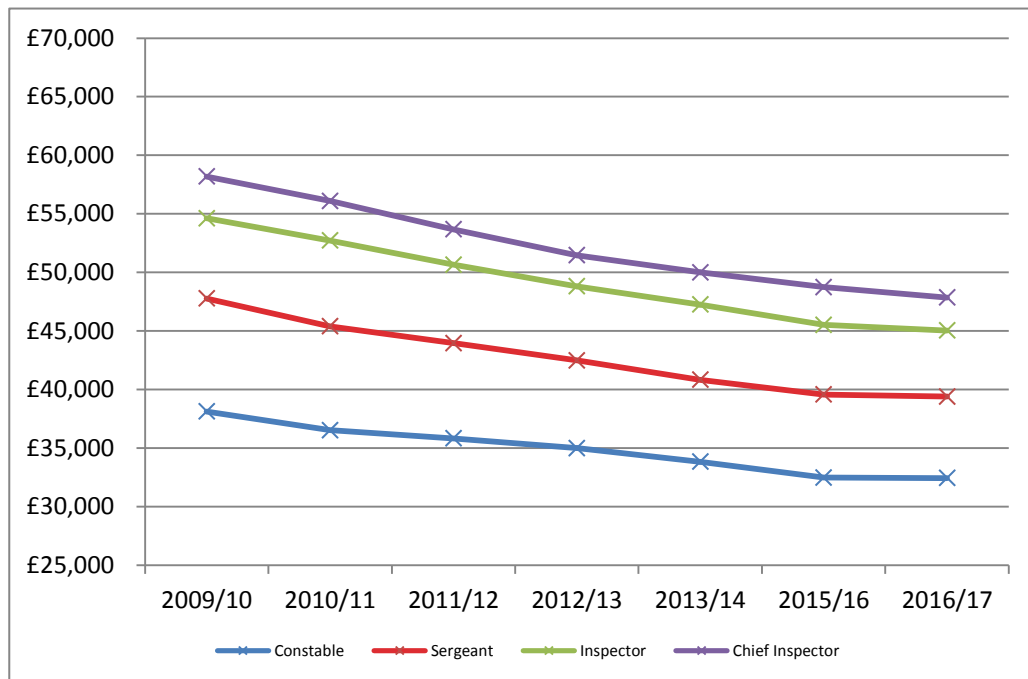
5.6.6 Constables' total pay also reduced overall by about 15% (from £38,125 to £32,443).

5.6.7 The real terms pay of Sergeants fell by just over 12% (basic) and about 18% (total), falls of about 1% since last year. There were also continuing falls in the real pay of Inspectors (just over 13% basic and about 18% total) and Chief Inspectors (just over 13% basic and 18% total).

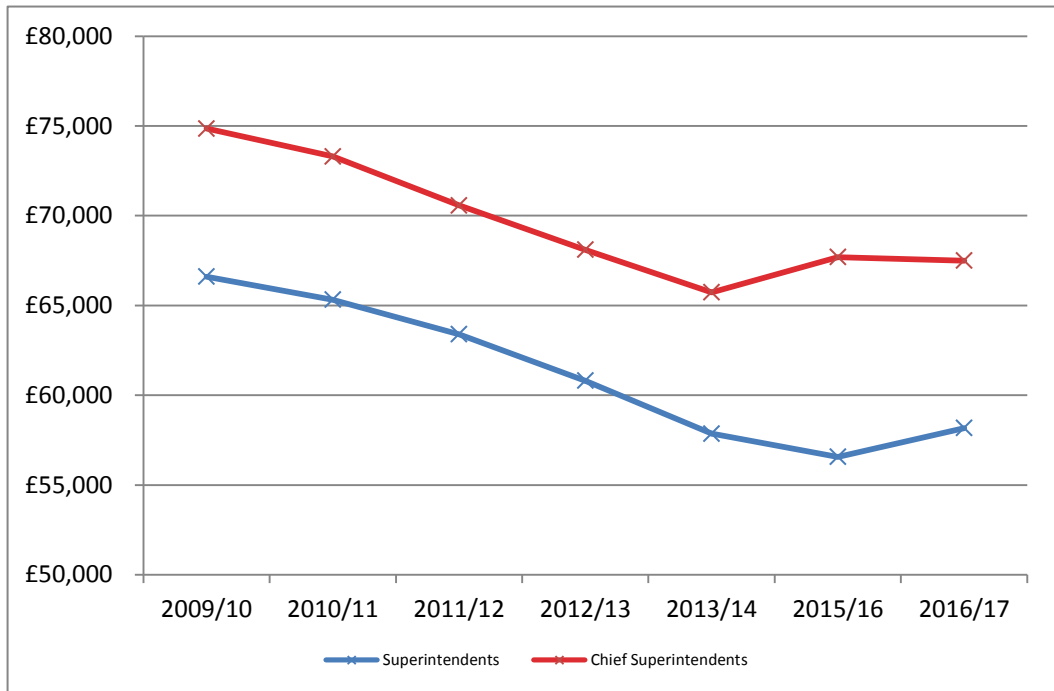
Graph 5.4: Average basic pay in real terms for federated ranks (at 2009-10 prices)



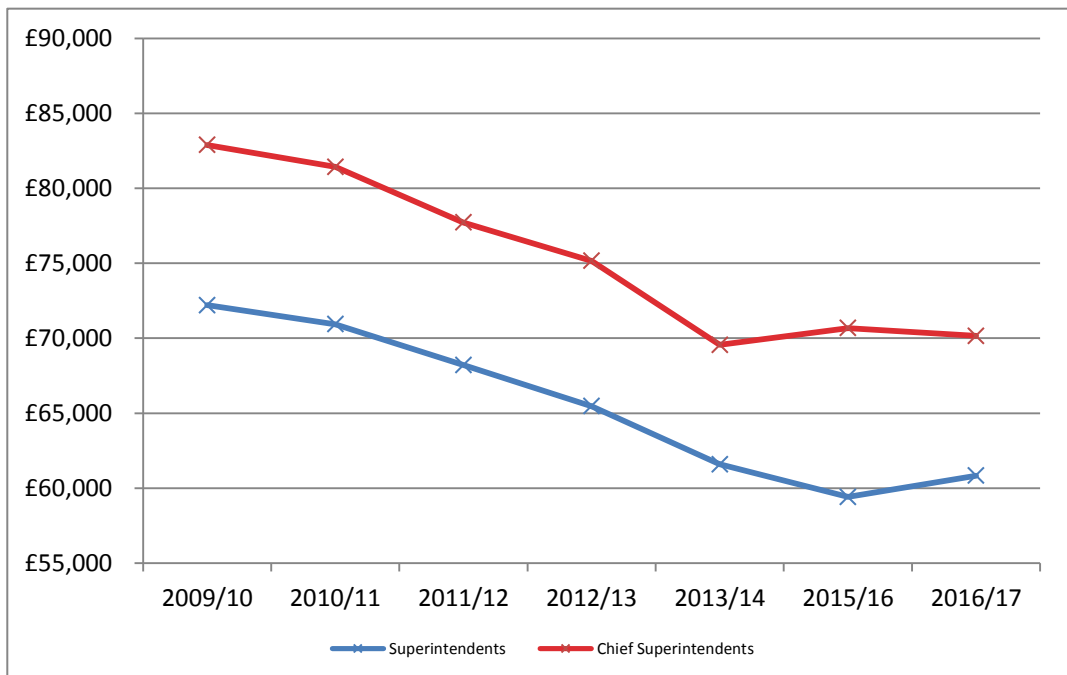
Graph 5.5: Average total pay in real terms for federated ranks (at 2009-10 prices)



Graph 5.6: Average basic pay in real terms for superintending ranks (at 2009-10 prices)



Graph 5.7: Average total pay in real terms for superintending ranks (at 2009-10 prices)



5.6.8 It should be noted that the slight recovery for Superintendents' pay in the last year is an artefact of the reduction of the number of pay points, (from 5 to 4), such that a number officers moved to the top of the scale during FY2016-2017. This raised the average pay. However, it should not mask the fact that over the time period as a whole Superintendents' pay lags behind inflation by around 13% in basic and 16% in total pay. For Chief Superintendents, there has been a fall of 10% in basic and 15% in total.

5.7 Summary

5.7.1 Over the period from 2010 to now, there has been a real terms gap in the value of police pay settlements (compared to RPI) across all ranks on the pay scales of about 16%. Last year the pay review body highlighted that the pay differentials between police earnings and the earnings of those in other groups such as associate professional and technical (APT) occupations had narrowed since 2010. Analysis of ASHE data for 2016-17 suggests that the real terms fall in police earnings since 2010 has been about 4% greater than for those in APT occupations.¹⁶

5.7.2 Although pay settlements in the whole economy and private sector in the last two years continue to cluster around a median of 2% there is growing evidence that wage growth will rise significantly in 2018. In this context police officer pay will be further squeezed on top of the current fall in real terms pay since 2010 of just over 16% for all federated ranks, 16% for Superintendents and 15% for Chief Superintendents.

¹⁶ Median pay for APT occupations fell by 11% compared to 15% for police officers below Sergeant. See ONS, *ASHE data for 2016/17*

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/occupation4digitsoc2010ashtable14>

5.8 Recommendation: pay uplift

- 5.8.1 Officers have already fallen significantly behind in the real terms value of their pay. We believe that officers should see no further decline, and that this year they should have a rise in line with forecast RPI inflation for 2018 of 3.4%.
- 5.8.2 The increase should be in addition to the consolidation of the pay award last year: that is, the 1% that was unconsolidated should now also be consolidated.
- 5.8.3 Going forward, we believe that even a relaxation of government policy that results in pay awards of 2% is not sustainable in the present public sector climate. In order to recruit and retain officers with the requisite skills, and to pay officers a fair wage for the tasks they do, money must be found to start making up the reduction in pay suffered by officers over the last seven years.

Uplift Evidence: Officers' attitudes

5.8.4 The PFEW and PSAEW conduct a number of surveys of members each year. The PFEW pay survey has attracted over 30,000 responses in each of the four years it has run. Findings have been published in a number of peer reviewed academic journals, and at conferences.¹⁷ Similarly the PSAEW runs a yearly pay survey. In addition, the PFEW runs a survey of new starters, and a survey of leavers. These are currently the only national surveys of officers. The data reported below are drawn from these surveys, and referenced.

5.8.5 The findings in the PFEW survey reinforce the economic data analysis provided, and show that officers are feeling the daily impact of the reduction in pay compared to inflation.

¹⁷ Examples of the articles published in peer reviewed journals on the basis of PFEW surveys include:

Career Progression Expectations and Aspirations of Female Police Officers in England and Wales, Dr Fran Boag-Munroe, published in *Policing - A Journal of Policy and Practice*, 12 September 2017 NEW

Police Officers Promotion Prospects and Intention to Leave the Police, Dr Fran Boag-Munroe, Dr Joan Donnelly, Dr Denis van Mechelen and Mary Elliott-Davies, published in *Policing - A Journal of Policy and Practice*, 12 August 2016

5.8.6 30,557 officers took part in the 2017 PFEW Pay and Morale Survey between April and June 2017; a response rate of 25% of all federated rank officers in England and Wales. The sample of respondents was broadly representative of federated ranks in England and Wales and was large enough that the percentages quoted in this report can be considered accurate within the normal bounds of academic rigour. (The margin of error is +/- 1%, at the 99% confidence level).

5.8.7 962 respondents took part in the 2017 Pay Survey between September and November 2017; a response rate of approximately 71% of PSA and Superintendents' Association of Northern Ireland (SANI) members.

5.8.8 Key findings¹⁸¹⁹ are cited below.

5.9 PFEW survey: Cost of living

- 72.5% of respondents in this year's survey said that they felt financially worse off now than they did five years ago.
- More than one in ten respondents overall said that they either never or almost never had enough money to cover all of their essentials.

¹⁸ PFEW Research and Policy Support, Boag-Munroe, Dr Fran: PFEW Pay and Morale Survey 2017: Headline Statistics July 2017, R011/2017

¹⁹ PFEW Research and Policy Support, Boag-Munroe, Dr Fran: PSA Pay Survey 2017– Headline Findings November 2017, R110/2017

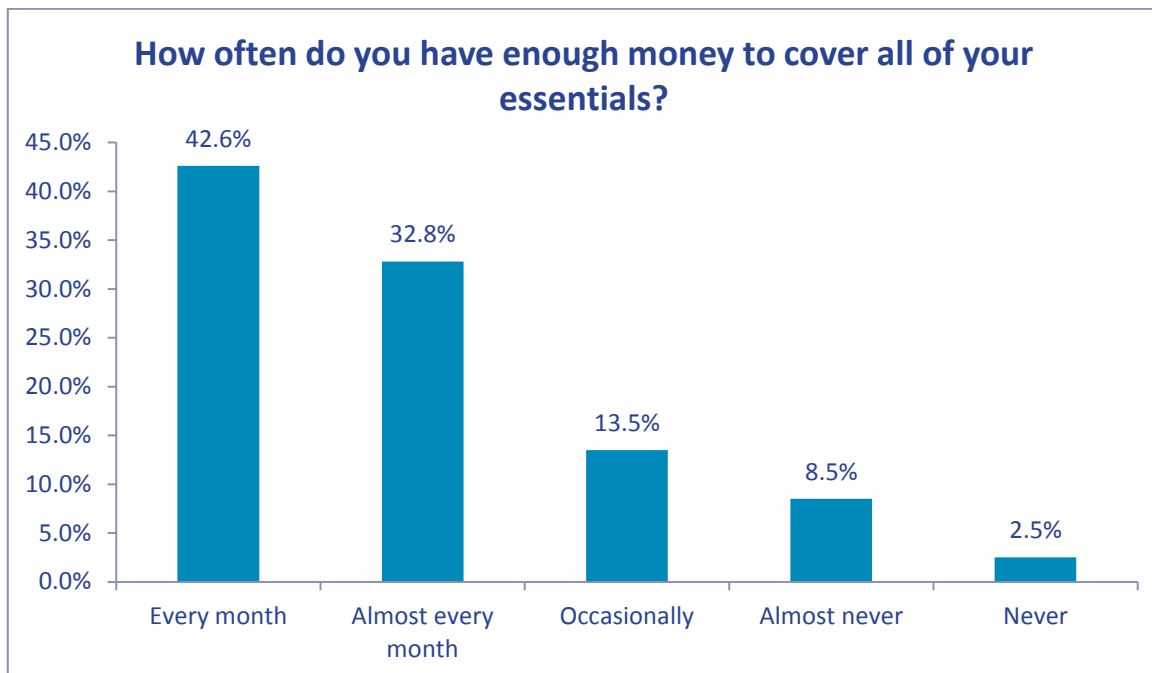
- Around one in six probationers said that they either never or almost never had enough money to cover essentials.

5.9.1 72.5% of respondents said that they felt financially worse off now than they did five years ago and 70.5% of respondents who lived in their force area said that the overall cost of living in that area was either expensive or very expensive. 45.6% of respondents who did not live in their force area said that the main reason for this was the cost of living in that area.

5.9.2 6.3% of respondents said that they had a second job: however respondents were not asked what this job was or their main reasons for having a second job.

5.9.3 Only 42.6% of respondents said that they had enough money to cover all of their essentials every month and more than one in ten respondents said that they either never or almost never had enough money to cover all of their essentials.

Figure 5.8: How often do officers have enough money to cover essentials?



5.9.4 Officers in their probationary period (i.e. between 0 and 2 years' service) were least likely to say that they had enough money to cover their essentials every month; **just 32.6% of probationers said they had enough money to cover their essentials every month**, compared to around one in six (16.3%) who said that they either never or almost never had enough money to cover essentials.

5.9.5 These data have clear implications for the starting salary, which has fallen significantly in real terms over recent years. Officers should not be undertaking a hazardous role on which the public depend, for a salary that does not allow them to cover their essential outgoings. We believe that it is morally and ethically wrong to consider asking them to do so.

5.10 PSA survey: Cost of living

- The proportion who disagreed that they get enough money to live comfortably has almost doubled since last year, from 11% in 2016 to 20% in 2017.
- Respondents were also more likely to say that they felt worse off than better off financially compared to five years ago.
- Two fifths of respondents reported being worse off now than five years ago.

5.11 PFEW survey: Fairness of pay

- 86.5% of respondents did not feel fairly paid considering the stresses and strains of their job.

5.11.1 Respondents were asked whether pay is fair taking into account hazards, stresses and strains, and training. The information gathered should be taken into account in considering any benchmarking vis-a-vis other organisations.

Table 5.9: Officers' perceptions of fairness in the remuneration system

| Factor | Disagree | Agree |
|--|-----------------|--------------|
| I am fairly paid considering the hazards I face within my job | 77.2% | 13.0% |
| I am fairly paid considering the stresses and strains of my job | 86.5% | 7.5% |
| I am fairly paid considering the amount of experience and training I have | 65.6% | 20.8% |

5.12 PSA survey: Fairness of pay

- This year's survey shows a large increase in the proportion of respondents who did not feel fairly paid. For instance, the proportion of respondents who did not feel fairly paid considering the stresses and strains of their job increased from 70% in last year's survey to 81% this year.
- The proportion of respondents who did not feel fairly paid considering their experience and training increased from 44% in 2016 to 60% in 2017.
- Finally, a majority of respondents (55%) said that they now felt less fairly paid in relation to the responsibilities of their job than they did 12 months ago.

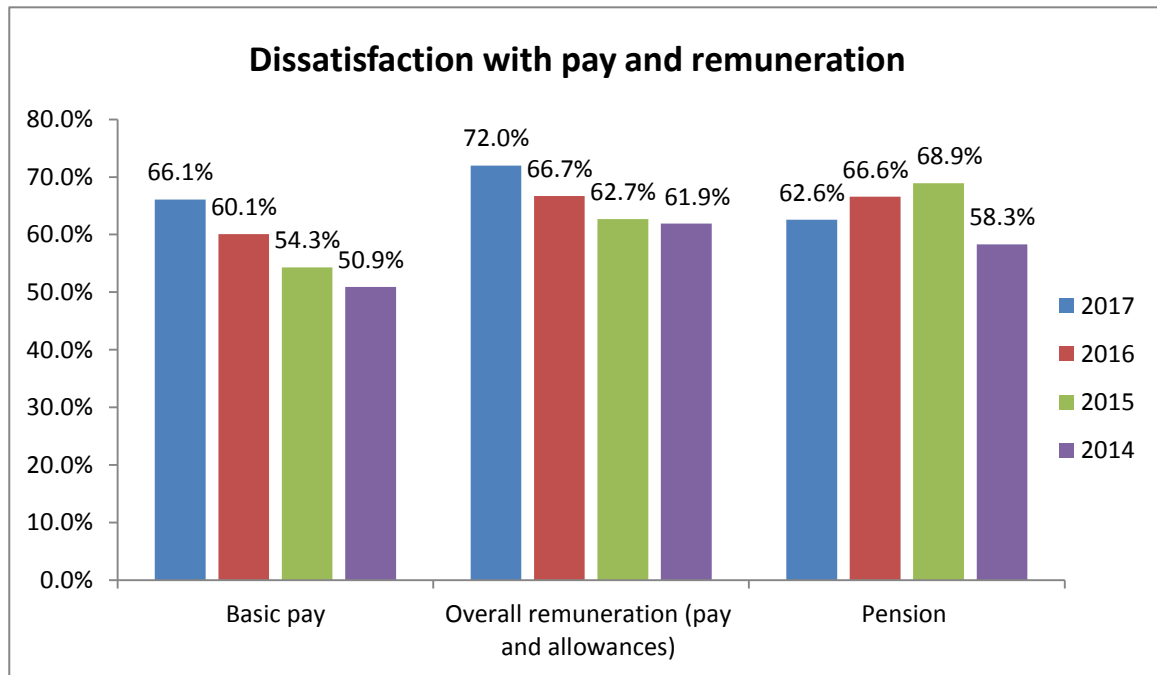
5.13 PFEW survey: Satisfaction

- 72.0% of respondents said that they were dissatisfied with their overall remuneration; this is a larger proportion of respondents than in any other year since the PFEW Pay and Morale survey began.
- 41.3% of respondents said that their pension increased their intention to stay in the police. The most common reason why respondents' pensions increased their intention to stay was that the level of the pension is good compared to other jobs.
- 30.0% of respondents said that their pension increased their intention to leave the police. The most common reasons why respondents' pensions increased their intention to leave were that they did not trust the government not to change their pension for the worse again in the future and that due to recent changes the pension they will receive is different to what they were led to expect.

5.13.1 The figure below demonstrates that officers have become increasingly dissatisfied with pay and their overall remuneration since the survey began. In 2014 51% (just over half) were dissatisfied with basic pay. That figure is now 66% (two-thirds). This is a sizable increase, and the trend is worrying.

5.13.2 Dissatisfaction with pensions peaked after the introduction of the CARE scheme. Dissatisfaction with pensions is higher than in 2014.

Figure 5.10: Dissatisfaction with pay and remuneration



5.14 PSA survey: satisfaction

- This year has seen a large increase in the proportion of respondents who were dissatisfied with their pay and remuneration. In particular, 47% of respondents said that they were dissatisfied with their overall remuneration, up from 35% in 2016.
- Just over half of respondents (51%) said that they were dissatisfied with their allowances, compared to 40% last year.
- The proportion of respondents reporting dissatisfaction has increased each year since the Pay Survey started, and more than a third of respondents now say that they are dissatisfied with their pension.

5.15 PFEW survey: Workload

- 72.2% of respondents in this year's survey said that their workload had increased in the last year; 71.5% said that their responsibilities had increased.
- 62.2% of respondents said that their workload had been too high in the last 12 months; this proportion is slightly higher than seen in last year's survey.

5.16 PSA survey: workload

- Over three quarters of respondents reported that their workload in the last 12 months has been too high, with 72% saying that their workload has increased in the last year.
- 76% said that their responsibilities have increased over the same period of time, with 32% of respondents saying that they have had additional responsibilities devolved to them from a person of a more senior grade during the last year.
- The proportion of respondents who said that they found it difficult to balance the demands of their job with what they wanted or needed to do in their non-work life has increased this year to 66%, with a majority saying that their work/life balance was worse than it was 12 months ago.
- Almost three quarters of respondents (73%) said that they make business calls whilst off duty and commuting to and from work either every day almost every day.
- More than two thirds of respondents (69%) said that they had not been able to take all of their annual leave entitlement during the last leave year, and just 17% of respondents said that they had not been able to take all of their rest days in the last 12 months.

5.17 PFEW survey: Morale

- 60.2% of respondents in this year's survey said that their own personal morale was low; this proportion is larger than the proportion of respondents who reported low morale in 2016.
- 84.9% of respondents said that how the police as a whole are treated had a negative impact on their morale. In addition, around eight out of ten respondents said that how change is managed within the police service had a negative impact upon their morale.
- The factor most likely to have a negative impact on respondents' morale was how the police as a whole are treated – with 84.9% of respondents saying this negatively affected their morale. In addition, around eight out of ten respondents said that how change is managed within the police service had a negative impact upon their morale.
- This year's results show that since 2016 there has been an increase in the proportion of respondents saying their morale has been negatively affected by their work-life balance, their health and wellbeing, their workload and responsibilities and their day-to-day job role.

5.17.1 The table below shows the reasons most commonly cited as impacting negatively on morale.

Table 5.11: Reasons for leaving, PFEW

| Factor | Negative effect on morale | |
|--|---------------------------|-------|
| | 2017 | 2016 |
| How the police as a whole are treated | 84.9% | 84.2% |
| Management of change within the police | 79.6% | - |
| Pay and benefits | 72.9% | 70.9% |
| Work-life balance | 65.3% | 58.2% |
| Health and wellbeing | 61.5% | 54.3% |
| Workload and responsibilities | 61.1% | 52.4% |

5.17.2 Data regarding reasons for leaving suggest that both pay, and the management of change in the police are key reasons. This makes it all the more important that the management of changes to pay are handled well.

5.18 PSA survey: morale

- The proportion of respondents who reported that their personal morale was low has increased since 2016, up from 18% last year to just under a quarter in this year's survey.
- In addition, 41% of respondents said that their personal morale was lower now than it was 12 months ago.
- Similarly, the proportions of respondents reporting low morale in their department/command, in their force and in the service as a whole have all increased since 2016.

5.19 PFEW survey: Intention to leave, and reasons for leaving

- 12.3% of respondents said that they planned to leave the police either as soon as possible or within the next two years. This compares with 11.8% of respondents in 2016. Respondents this year were slightly less likely to intend to stay in the police service until pension age compared to last year; however the differences between 2016 and 2017 were small.
- Amongst respondents who intended to leave the police either as soon as possible or within the next two years, morale was the most commonly cited factor affecting intention to leave. 78.5% of respondents intending to leave the police said that their morale had a major effect on their intention to leave.
- More than two thirds of respondents also cited the impact of the job on their health and wellbeing and how the police as a whole are treated as having a major impact on their intention to leave, whilst a majority also said that their pay and benefits, the impact of the job on their personal life and how change was managed in the police had a major effect.

Table 5.12: Reasons for leaving, PSAEW

| Factor | No effect on intention to leave | Some effect on intention to leave | Major effect on intention to leave |
|---|---------------------------------|-----------------------------------|------------------------------------|
| Your morale | 3.1% | 18.4% | 78.5% |
| The impact of the job on your health and wellbeing | 6.3% | 21.3% | 72.4% |
| How the police as a whole are treated | 7.6% | 22.5% | 69.9% |
| Your pay and benefits | 10.0% | 27.8% | 62.2% |
| The impact of your job on your family/personal life | 9.7% | 28.9% | 61.4% |
| Management of change within the police | 12.1% | 34.7% | 53.3% |

5.20 PSA survey: intention to leave, and reasons for leaving

- There has been a decrease in the proportion of respondents who said that they intended to stay up until, or beyond, pension age; from 77% in 2016 to 71% in 2017. Despite this, by far the most common intention amongst respondents with regards to staying or leaving the police was to remain in the police until pension age.
- A much larger proportion of respondents said that their workload and responsibilities and the impact of the job on their family and personal life had a major impact on their intention to leave compared to 2016.
- There has also been a 14 percentage point increase since last year in the proportion of respondents who said that their pay and benefits had a major impact on their intention to leave.

Table 5.13: PSA survey reasons for leaving

| Major impact on intention to leave... | 2017 | 2016 | 2015 |
|--|-------------|-------------|-------------|
| The impact of your job on your family/personal life | 58% | 44% | 54% |
| Will have reached full pension age | 54% | 56% | 49% |
| The impact of the job on your health and wellbeing | 47% | 47% | 44% |
| Your morale | 45% | 40% | 35% |
| Your workload and responsibilities | 38% | 23% | 29% |
| Your pay and benefits | 37% | 23% | 33% |
| How the police as a whole are treated | 33% | 33% | 39% |

Uplift Evidence: Recruitment and Retention data

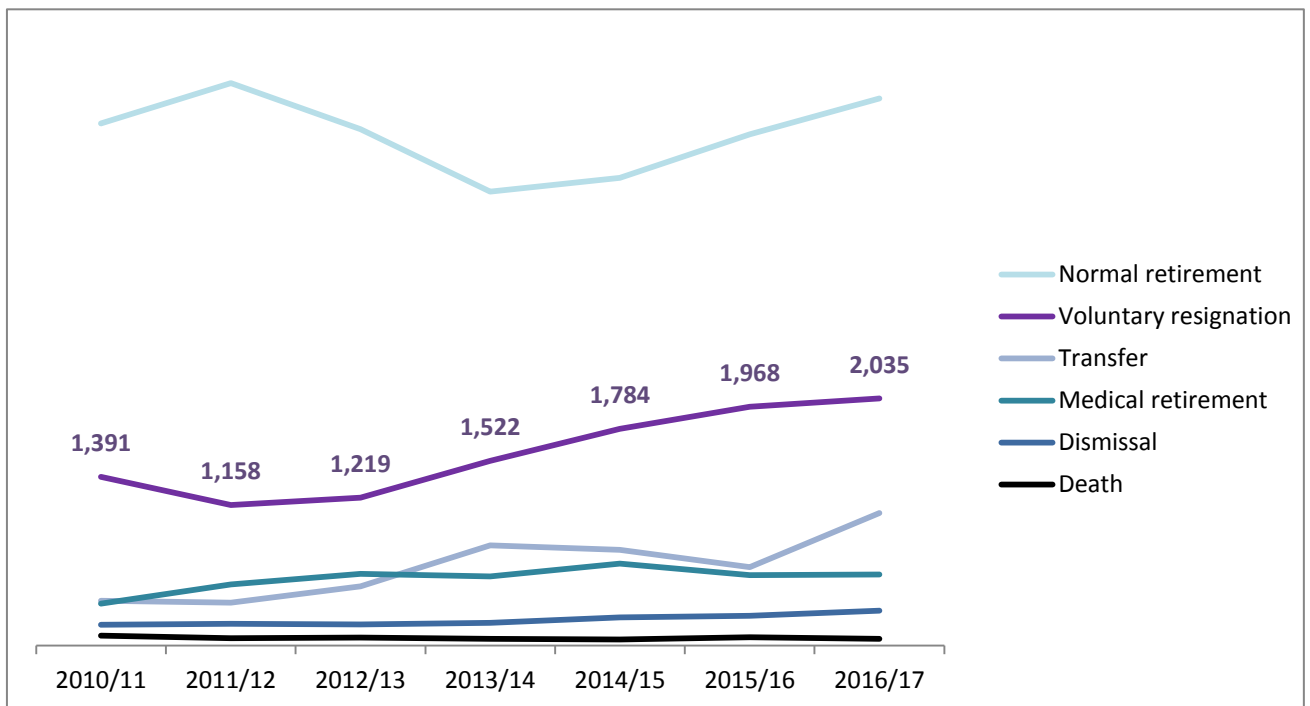
5.20.1 We continue to have concerns about the quality of data that is collected for the workforce as a whole. Some progress has been made in the last few years, but the majority of the data that is needed for meaningful analysis of recruitment and retention issues, including data regarding the calibre of recruits, are still not available. Our commentary on the current data capture is provided at Annex B.

5.20.2 We have, however, been able to establish that voluntary resignations are increasing. When the outflow data is broken down into types of leavers, it shows that the second largest group of leavers are via voluntary resignations, and that there has been an upwards trend in this data since 2011/12 (Graph 5.14). When considered vis-a-vis the economic trends of the last few years, such as higher annual unemployment during the recession, becoming lower, an interesting pattern appears that may offer support the below supposition, which was included in our first PRRB submission:

5.20.3 *“The recent austerity and shrinking job market may have caused a reduction in competitive remuneration. Therefore, it would be worth noting that officers who haven’t left during recession may well leave upon economic upturn. Recent research has found a correlation between unemployment rates, consumer confidence and voluntary turnover rates; suggesting that as economic fears recede, voluntary turn over rises.”*²⁰

²⁰ The Police Federation of England and Wales. (2015). Submission to the Police Pay and Remuneration Body on behalf of the Police Federation of England and Wales (PFEW) and the Police Superintendents’ Association of England and Wales (PSAEW), page 71.

Graph 5.14: Outflow type by year²¹



²¹ Home Office. (2017). Police workforce, England and Wales, 31 March 2017: leavers data tables [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-open-data-tables>

6 Chapter 6 The 4 matters in the remit letter

Section 1. How to apply the pay award for 2018/19 for police officers of all ranks, including chief officers, in accordance with the Chief Secretary's letter and in the context of how it will support overarching NPCC proposals and timetable for a new pay structure

- 6.1.1 In the absence of any proposals otherwise, we believe that the pay uplift should be applied equally to all officers, across the board. As outlined in section 5.8 we want to see an uplift of 3.4% for all, in addition to the consolidation of last year's unconsolidated element.
- 6.1.2 We understand that the NPCC are considering new structures for paying officers. However, at this stage these ideas are undeveloped, and should not influence this year's pay recommendation. For example, we understand the NPCC are considering potentially benchmarking against other organisations. We are open to this concept so long as it is done appropriately. We have had some technical discussions regarding this, in June 2017, however we have not had any discussions or update regarding the roles chosen for benchmarking since then.

6.1.3 Our primary concern is that any benchmarking undertaken must not be simplistic. We know officers earn more than many members of the public; however, we believe they deserve to, due to the risks of the job and the nature of tasks undertaken. All officers should have their pay appropriately set, taking into account their interactions with the public and the risk of abuse and assault; the possibility they may deal with harrowing road traffic accidents, sexual abuse cases, or events such as the Manchester bomb; and the fact they have restrictions on their private lives, and no industrial rights.

6.1.4 Following a number of technical working meetings with the NPCC representative, on 5th June 2017 we sent a summary of discussions and suggestions regarding benchmarking to the NPCC. We await a response. It is worth outlining some of the content of that correspondence, to reflect to the PRRB our position regarding benchmarking. The email is provided in full at Annex C.

6.1.5 The key points are:

- It was agreed that the College of Policing (CoP) role profiles as they currently stand these are incomplete and of relatively limited value in setting pay.
- We discussed the fact officers do a unique role, and it would be difficult and inappropriate to choose a single external role to benchmark against.
- The NPCC raised the idea of benchmarking against the military: but we agreed there are significant differences in the jobs. The Armed Forces, for example, have much less direct interaction with the public, and are likely to have differing requirements regarding interpersonal skills, and ability to persuade members of the public and calm situations. Fire officers were also discussed, and while we believe that would be appropriate from the point of view of conducting a dangerous role, it would not necessarily from

the perspective of including softer interpersonal skills, or certain role based skills.

- We therefore agreed there is no single overall global comparator.
- The staff associations' position is that if benchmarking is conducted, it should include consideration of the job content. This may be best achieved by having a matrix of types of knowledge, skills, and behaviours potentially needed in policing, and a range of jobs for benchmarking purposes, which are likely to require some, but not all, of the same types of skills.
- We believe there is a possibility of using such an approach for benchmarking, weighting job components, and arriving at a way of deriving an appropriate weighting which would ultimately feed into the pay mechanism for policing.
- The staff associations provided a preliminary matrix, as a start point. That is replicated below. We have had no response to that. We therefore remain concerned that any benchmarking might be unduly simplistic and not fit for purpose.
- The table before was not intended to be definitive. There was discussion in June 2017 of running workshops with interested stakeholders, which the staff associations were willing to engage in and potentially host. To date, we have not been notified of whether these will in fact now take place.

Table 6.1: Matrix of Knowledge, skills, and attributes that might be considered in any benchmarking exercise

| Type of Knowledge, Skill, Attribute | Job comparator | Degree to which this KSA affects overall remuneration in comparator, and degree it should in policing | Overall actuarial evaluation of role |
|--|---|---|--------------------------------------|
| Educational qualifications - entry knowledge requirements (eg degree level) Qualifications required at higher ranks | Teaching NHS Other public service | TBC | TBC |
| Soft skills - Interpersonal skills (dealing with public) Line management skills at Sgt and above | NHS roles (nurse / doctor)? Service industry roles Social workers | TBC | TBC |
| Core competences required by all (eg IPLDP) First aid Legal | NHS roles | TBC | TBC |
| Specialist skills, where appropriate (eg firearms training; cyber skills; investigative skills) | Specialist IT Research roles? Specialist finance roles | TBC | TBC |
| Special circumstances (eg danger) | Fire brigade | TBC | TBC |

6.1.6 We also understand the NPCC are considering targeting of pay. Indeed, the remit letter last year continued a request from the NPCC to consider targeted pay. However, we still have no firm proposals from the NPCC, and on that basis we believe it is inappropriate for the PRRB to recommend any targeting in this round.

6.1.7 Our position regarding benchmarking is backed by evidence. Table 5.9 demonstrates that officers already feel their pay is not fair when the hazards, stresses and strains, and training they face are taken into account. Any benchmarking should be cognisant of this, and should ensure that officers are benchmarked against roles where incumbents face similar levels of these features.

6.2 Survey data regarding targeting of pay: PFEW survey

6.2.1 Two types of pay targeting have been proposed by the NPCC. One is the immediate issue of short-term time limited payments to address specific recruitment and retention issues (bullet point 3 of the Home Secretary's remit letter). This is dealt with later in this submission at Chapter 6, Section 3.

6.2.2 The other is the more "permanent" building in of pay targeting to the overall structures and mechanisms of pay for the longer term. We understand this might include payment for specific responsibilities; competence based pay, and so on.

6.2.3 In this section, we report members' findings on the existing context, and attitudes to some of the types of targeting that have been proposed for the longer term. The NPCC proposals on this are not yet fleshed out sufficiently for a full response by the staff associations, but we believe it is important that the following is taken into account in any future designs.

6.3 Pay Targeting: the existing context

6.3.1 One change that has already been conducted is that Constables are now required to achieve certain competences to attain pay point 4, via the Assessing and Recognising Competence programme. This is based on Performance Development Review ratings. The following finding is therefore of particular concern:

- More than a quarter of respondents said that they had not had a Performance and Development Review (PDR) in the last year and a majority of respondents were dissatisfied with the PDR process.

6.3.2 With regard to changes already being implemented that will impact likely career progression, the following findings are noteworthy:

- 79.5% of respondents said that they have not applied for promotion to a higher rank; the most common reason for not applying for promotion was that it would not be worth it for the responsibilities and pressures of the role.
- More than three quarters of respondents said that “Direct Entry” schemes would have a negative impact upon policing; most substantially, 82.4% said that Direct Entry at Inspector would have a negative impact.
- 34.6% of respondents said that the introduction of Advanced Practitioners would have a positive impact upon policing: however respondents were more likely to feel that the introduction of Advanced Practitioners would have a positive rather than a negative impact.

6.4 PFEW survey: Attitudes to pay targeting incorporated in longer term pay structures

6.4.1 In addition to findings regarding the existing context, the PFEW has produced an analysis of questions related to different ideas for longer term structures that might be used to underpin pay targeting, that were included in our pay survey.

6.4.2 In the main PFEW pay survey we asked officers a number of questions about their attitudes to various types of pay that have been mentioned in stakeholder meetings as being possibilities for the future (albeit some are more developed than others).

6.4.3 We defined the types of pay as follows:

- Incremental pay:
Pay that is based on length of service
- Knowledge-based pay:
Pay that takes into account knowledge inherent in policing, e.g. legal knowledge
- Specialist pay:
Extra pay for any special skills, e.g. firearms, cybercrime, over and above the generic skills defined in the Policing Professional Framework
- Competency-based pay:
Pay that is dependent on officers demonstrating more competence in policing over time
- Performance-related pay:
Pay that is awarded to those who are believed to be performing the job to a higher standard than others
- Workload-related pay:

Pay that reflects that the role the officer performs carries a higher workload, e.g. has a higher requirement for on-call, overtime, long hours, wide span of control

- Regional pay:

Pay that reflects the cost of living where you live

- Pay that compensates you for being fully deployable:

Pay that compensates officers who are available to do all component of the Policing Professional Framework and be available 24/7.

- Training pay rates:

Lower rates of pay for officers whose role has "protected" learning time, and therefore do not undertake operational duties as often as other officers

- Locally-determined pay:

Pay that is at the discretion of the Chief Constable of each force, rather than being nationally determined

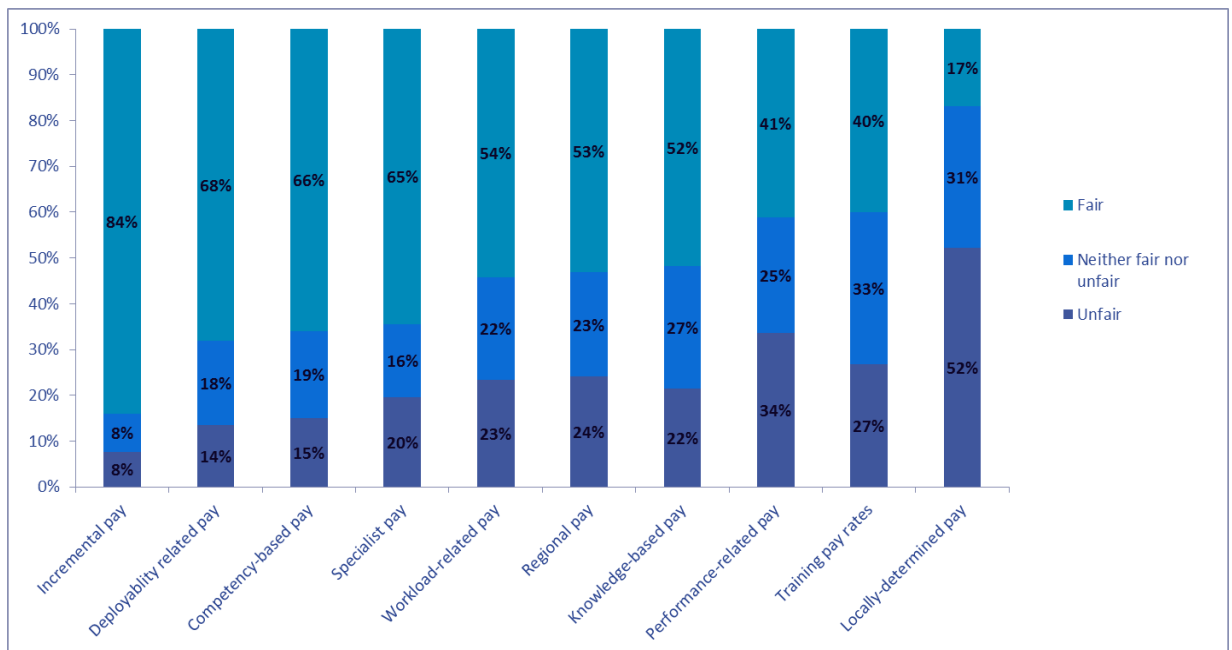
6.4.4 Incremental pay was most likely to be seen as fair by respondents. 84% of respondents said that pay based on an officer's length of service was either fair or very fair. Compared to just 8% who felt it was unfair. The proportion of respondents who felt that incremental pay was fair has increased since last year when 71% of respondents said that this method was fair.

6.4.5 Respondents' comments indicated that many officers saw pay linked to length of service was a good reflection of the fact that knowledge and experience were acquired over time. In addition, there was a sense that this method was "fairer" than any of the other methods that had been mooted.

The PFEW's other research (for example our Equal Pay Audit) and views based on experiences when the service has tried to implement competence based pay (for example under the Assessing and Recognising Competence project) suggests that there are very practical barriers to implementing any system other than incremental pay. In the words of one survey respondent: *"It would be very difficult to implement a pay structure that takes into account and has to assess skill level, workload, deployability, etc etc (ie a response officer has relatively low skill but high workload, personal risk and responsibility - a cyber crime officer will have high skill and low workload personal risk) so all roles are different and require different attributes. Therefore a uniform pay scale is fairer."* Sergeant, 17 years' service

6.4.6 Overall, officers' perceptions regarding the fairness of different methods can be seen in figure 6.2

Figure 6.2 Proportion of respondents who felt each method of determining pay was fair or unfair



6.4.7 66% of officers believe that pay dependent on officers demonstrating more competence in policing over time is fair, while 65% believe it is fair that officers should receive extra pay for special skills, over and above the generic skills defined in the Policing Professional framework. However, the comments received demonstrate that officers are alert to the dangers of such types of pay, and the need to design it carefully, so that the impacts on overall service resilience and fairness (including to minority groups) is properly attended to.

“The reason higher pay should not be linked to role, knowledge, work, experience, deployability is because it is both discriminatory and divisive. There are not enough places in roles for everyone that would want the higher pay to go to. Once there you may end up being burnt out by the role but no longer be able to take the pay cut that would happen if you then moved.” Constable, 21 years’ service

“If the selection and recruitment process was not as open to all as it should be or the line manager favoured one officer over another and appraised them differently for competence related pay then essentially your fate rested in their hands. You would be disadvantaged in future pay and recognition and the system would become divisive” Chief Inspector, 20 years’ service

“It is unfair to pay someone more for specialist roles, workload etc. unless all opportunities are available to the majority. Specialist roles are limited and workload often increases and decreases for each team members. All Police Officers work hard within an individual role to collectively reduce crime.” Constable, 9 years’ service

“Policing is too complex an area to impose performance related pay and anything that divides officers by pay band other than time served is likely to prove extremely complex, problematic and divisive.” Constable, 7 years’ service

“The problem with performance pay is that people work to the target rather than having a holistic approach and encompassing those elements that are not covered by the performance indicators” Constable, 13 years’ service

6.4.8 Respondents’ role was the strongest predictor of whether or not they considered specialist pay to be fair. Whilst 52% of respondents in a Custody role, and 57% of respondents in either a Response policing or Neighbourhood policing felt that it was fair for officers to receive extra pay for special skills, 70% of respondents in an Intelligence role, 71% of respondents in an Operational Support role, and 74% of respondents in an Investigations role felt that specialist pay was fair.

6.5 PFEW survey: Hard to fill roles

- A majority of respondents said that they would never want to do one of the roles classified by the National Police Chiefs’ Council as “hard-to-fill”, including firearms, custody, public protection (including CSE and domestic violence) or detective role.
- More than one in ten respondents currently in a Public Protection role and around one in five respondents in a Custody role said that they would like to be redeployed as soon as possible.
- On the other hand, the proportions of respondents who said that they wanted to do each “hard-to-fill” role either now or in future exceeded the proportion of the police officer workforce currently undertaking that role (for instance, 42.8% of respondents said that they would want to do a detective role either now or in future, whereas the current proportion of the officers in this role is 23.4%).

Table 6.3: Proportions of officers willing to do “hard to fill” roles

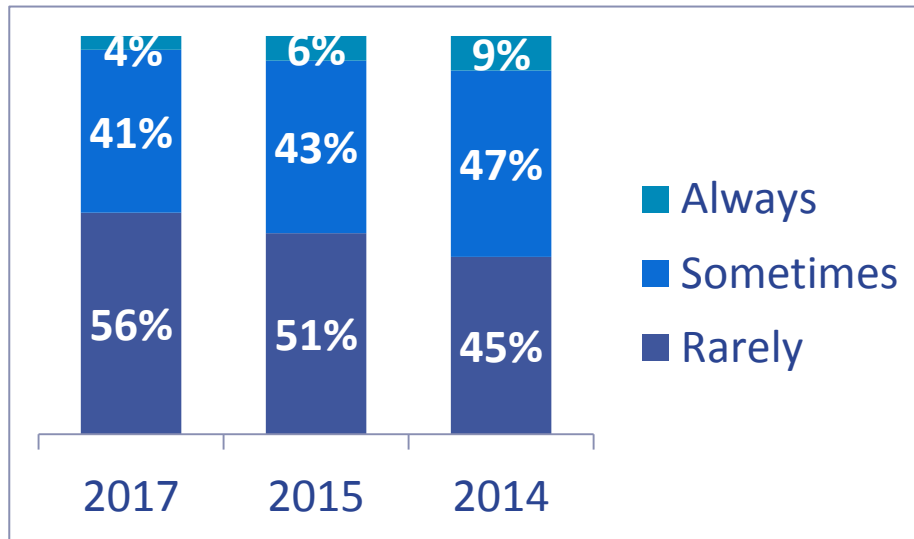
| | I would never want to do this role | I might want to do this role in future | I want to do this role now |
|--------------------------|------------------------------------|--|----------------------------|
| Firearms | 64.3% | 28.6% | 7.1% |
| Custody | 73.1% | 25.3% | 1.6% |
| Public Protection | 69.7% | 27.0% | 3.3% |
| Detectives | 57.2% | 35.7% | 7.1% |

6.5.1 We believe it is worth looking at the reasons why officers may not want to do hard to fill roles in more depth.

6.6 An example of proposed pay targeting based on specialism / accreditation: data from our National Detectives’ survey

6.6.1 Our National Detectives’ survey demonstrates the challenges that officers face were any pay system be implemented that depends on formal learning or accreditation.

Graph 6.4 : Are you given enough time to stay up-to-date with the latest developments in your area of work?



6.6.2 Further, officers stated that “It is difficult to stay up-to-date with the latest developments in my field because...”

- I have too many competing priorities 79%
- There is no time set aside by my management for study 76%
- There are not enough officers to cover my work for me to attend 76%
- My workload is too high 76%
- I have too many other commitments 75%

6.6.3 There is a danger that simply linking pay to performance of these roles ignores the challenges faced by officers, and the need to address the difficulties regarding accessibility of training, in order to make the roles accessible to all, regardless of gender or any other protected characteristic.

6.6.4 It is important to ensure the voice of officers on this matter is heard. Some quotes taken from respondents to the PFEW pay survey demonstrate that officers from a range of roles are concerned that current pay does not reflect the nature of the role.

“Pay, conditions, allowances and pensions are constantly attacked and reduced. They do not reflect the danger, stress, responsibility or workload that a police officer is expected to deal with.” Inspector, 23 years’ service

“The competency and skill level factors proposed to decide officers pay are derisory and do not factor in workload or the individuals value for money within their community in their particular role.” Constable, 28 years’ service

6.6.5 When asked whether some kind of job evaluation method might be appropriate, officers were sceptical.

“To be effective, this would have to be run as a wholly independent assessment staffed by skilled and experienced practitioners without a pre-imposed agenda, either political or managerial (eg cost cutting). They would need to report to someone other than the politically controlled Home Office, the highly political PCCs, and certainly not to chief officers. This is because for any of these entities the conflicts of interest would undermine the process.” Constable, 22 years’ service

6.7 Recommendation regarding how to apply the pay uplift

6.7.1 We have made a strong case for this year’s pay uplift to be across the board, to all officers.

Section 2. NPCC proposals for police officer apprenticeship pay, which will need to be considered outside of the usual reporting timetable

6.7.2 The remit letter notes that apprenticeships will be introduced in forces next year and states that sector agreement on linked pay proposals is expected early in the New Year. It further notes that the NPCC have committed to circulate proposals to partners “***in good time that these can be considered alongside the main body of written evidence***”.

Unfortunately, however, this has not been the case.

6.8 The process thus far

6.8.1 Up until the 22nd January 2018 the NPCC had provided us with information regarding their data gathering, and the idea that benchmarking versus other organisations would occur. However, we had no firm proposal, nor have we had a response regarding our concerns about the method proposed. On the 22nd January 2018, two weeks before the submissions to the PRRB, the NPCC notified all parties to a PCF meeting that they intend to recommend a starting salary of £18,000 for apprentices.

6.8.2 Clearly this demonstrates a failure of the process in which we are engaging. It demonstrates an unwillingness to give the staff associations any reasonable time period in which to consider this proposal fully.

6.8.3 The staff associations have repeatedly asked for a timescale to be set out by which data will be considered, and proposals made. This has not been forthcoming, and we had no notification that the NPCC intended to field this figure at the PCF, even though we had asked in writing on several occasions for a timetable.

6.9 The NPCC proposal: our response

6.9.1 Notwithstanding the NPCC failure to consult in any way on the figure suggested, we have a number of very serious concerns, any one of which should be enough to stop this proposal from being accepted. These are:

- The proposal is derisory and would cause considerable hardship to any individual apprentice taking it up.
- The method (as we understand it) by which it has been derived is flawed, failing to take into account what officers do when making external comparisons, or to consider internal relativities.
- The impact on policing as a whole has not been taken into account. We believe there would be a number of unintended consequences:

6.10 A derisory offer

6.10.1 The proposed starting salary for apprentices of £18,000 compares to the starting salary since last year's pay increase of £20,169 (assuming the 1% unconsolidated element is included). That is, it is £2,169 lower. (And this differential will likely increase following this year's uplift).

6.10.2 Furthermore, this is £5,352 below the usual starting salary of £23,352 at pay point one (again assuming the 1% unconsolidated element is included). It is only 77% of the usual starting salary – nearly one quarter less.

6.10.3 No compelling rationale has been documented to us for this differential. Verbally the NPCC and College of Policing have indicated that they are basing the remuneration on the training abstraction rate for apprentices. That is, they say that because those on the higher apprentice scheme should have 20% of their time set aside for learning, this justifies paying them 20% less than other recruits. However, this does not take into account the fact that all new starters in policing spend 20% or more of their time in training, during the probationary period.

6.10.4 Our understanding is that apprentices will be required to undertake the same duties as other new joiners. We believe that the point at which new starters are warranted is crucial, and that it is wrong to pay different rates to officers at this point. All officers reaching this point, and therefore required to undertake the same duties and levels of responsibility should be paid the same. In particular, if the ethnic and gender profile for apprentices differs from that of the other two entry groups at this critical point, and they are still being paid less, we believe that this may constitute indirect discrimination.

6.10.5 Furthermore, until the Winsor Review²² the starting salary for officers was £23,259, in September 2010. In 2013 the potential to pay only £19,000 was put in Regulations. A Constable who was appointed in 2013 (and who remains on their starting salary perhaps due to a career break) would have a starting salary of a minimum £24,690. If the £18,000 starting salary is accepted then apprentices will earn only 73% of what a Constable appointed before April 2013 would have earned.

6.10.6 Most Chief Constables don't use the lower figure, presumably recognising it is unfair and would not attract the candidates needed. We would therefore question whether there is any real point in allowing an even lower figure, given that Chief Constables already refuse to use the lower salary?

6.10.7 A starting salary of £23,259 prior to the Winsor Review in 2012 equates to £21,671 today. This represents a real terms decline in starting salary of 7%, during a period when officers are dealing with more complex crimes, and higher workloads due to reduced numbers.²³

6.10.8 As reported earlier, our pay survey shows that only 32.6% of probationers (those in their first two years of service, earning approximately £23,000 - £24,500, depending on start point) said they had enough money to cover their essentials every month, compared to around one in six (16.3%) who said that they either never or almost never had enough money to cover essentials. A further reduction of pay is, we believe, unsustainable.

²² Winsor, T., (2011) Independent Review of Police Officers' and Staff Remuneration and Conditions

²³ This is based on the difference between cumulative 5% increase (1% per year) in this starting salary from Sep2013 onwards less cumulative RPI inflation of 12.0%. A real-terms fall in value of 7%.

6.10.9 The following shows what we calculate a Constable earning £18,000 would take home, and what his / her disposable income might be, basing rental and council tax figures on published data. (Government data is used where possible).

Take home salary calculation

| | |
|----------------------------------|-------------------------|
| Pre tax salary | £18,000 |
| Monthly | £1,500 gross |
| After tax and National Insurance | £1293 ²⁴ |
| After pension deductions of | £186 ²⁵ |
| | £1,107 take home |

Disposable income = Take home – necessary living expenses

| | |
|--------------------------|--------------------|
| Rent | £746 ²⁶ |
| Council tax | £100 ²⁷ |
| Food | £150 |
| Travel | £100 |
| Utilities | £50 |
| Disposable income | £ - 39 |

²⁴ According to HM Revenue and Customs Income tax and National Insurance payments calculator <https://www.tax.service.gov.uk/estimate-pay-take-home-pay-your-results>

²⁵ Based on a pre-tax contribution rate of 12.4%

²⁶ Average costs of renting a one bedroom property in the UK, Countrywide survey, quoted in The Guardian 12 June 2016 <https://www.theguardian.com/money/2016/jun/13/cost-of-renting-one-bed-property-soars-in-uk>

²⁷ Based on the average 2017-2018 council tax in England, Page 10, Department for Communities and Local Government: Council tax levels set by local authorities: England 2017-2018. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/603781/Council_tax_levels_set_by_local_authorities_in_England_2017-18.pdf

6.10.10 In other words, officers would need to borrow each month just to pay their bills, or would have to claim benefits to survive. Given that officers' pay comes from public taxation, as do benefits, this seems rather pointless, and furthermore would surely be a political "own goal" on the part of the government. At paragraph 5.3.13 we noted that the Institute for Public Policy Research have stated that increasing public spending would generate additional economic growth, and that higher taxes and lower welfare spending would reduce the cost of any pay increases.

6.10.11 We understand the NPCC position that apprentices will attain a degree without incurring the usual student fees. But students do not repay their loans for several years, until such time as they are deemed to earn enough so that it effectively becomes a deferred tax. The NPCC proposal seeks to reduce salary, implying this is quid pro quo for the degree. However, if the salary is too little for an officer to live on, this simply isn't workable.

6.10.12 We are concerned that officers in such a position will cut costs whether they can. This may have an unintended consequence that apprentices do not join the police pension scheme. This would be have a catastrophic effect on the pension scheme.

6.11 Methodological flaws

6.11.1 We believe there are a number of methodological flaws in the NPCC calculation of a starting salary of £18,000:

- The benchmarking against other employers offering degree apprenticeships does not stand up to scrutiny;
- The salary does not seem to take into account internal relativities, given other routes into policing

- We have seen no market testing of this figure. On the contrary, the Metropolitan Police Service conducted a survey asking whether potential applicants would be attracted by a figure of £29,000.

1) NPCC benchmarking

6.11.2 In September 2017 the NPCC shared pay data regarding apprenticeships. The main data source was stated as being the Apprenticeship Pay Survey, July 2017, by IFF Research for the Department of Business, Energy and Strategy. The data supplied was for current apprenticeships ending at level 5, with no data on level 6 apprenticeships.²⁸

6.11.3 This data set is for lower level apprenticeships, and includes a number of industries where the minimum wage is the norm. This has the effect of depressing the average wage calculations within it. Further, the figures are for 2016 and have not been adjusted to reflect 2017 inflation or average wage increases. That said, the NPCC calculate from this data a median pay estimate for level 4/5 of £20,446 pa (grossed up from £9.83 per hour figure).²⁹

6.11.4 The NPCC informed us of an intention to set pay for degree apprenticeships “between (the) two reference points” of all current apprenticeship salaries and graduate salaries”.³⁰

6.11.5 We agree with the PRRB that the analysis should include degree level roles, and should cover early pay progression.

²⁸ IFF Research (2017). Apprenticeship Pay Survey, 2016 UK Data Service
SN:8204 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/630082/apprenticeship-pay-survey-2016-report-england.pdf

²⁹ Email communication from the NPCC dated 22nd September 2017.

³⁰ Ibid.

6.11.6 In their September communication with us, the NPCC referred to The Times survey published in 2017 as part of their work to directly source level 6 apprenticeships (i.e degree apprenticeships). However, although the NPCC seem to have interpreted this as being a level 6 survey, in fact it covered both Higher (level 4-foundation degree) and Degree Apprenticeships.³¹ This might account for some of the very low rates recorded when starting salary ranges are reported, and explains why overall “this level 6 (*sic*) data appears to be lower than that derived from the IFF survey”.³² This fact should, we believe, ring alarm bells regarding the validity and comprehensiveness of these data. We believe the interpretation of this data thus far has been questionable. For example, it isn’t clear which salary figures refer to level 4 and which to level 6 apprenticeships. Nor is it clear whether companies who pertain to run level 6 programmes have actually supplied data for these programmes at all, or only for their lower level programmes. Approximately 75% of employers in the survey have not disclosed salary figures (instead referring to ‘competitive’). The BAE Systems starting salary (reported as ‘competitive’ in The Times) was £22,000 for aerospace engineering in 2015.

6.11.7 We mentioned early in this submission the outpouring of public support and gratitude following the terrorist attacks on Westminster Bridge, Manchester, and Borough Market, and the Grenfell fire tragedy. We do not believe the public would expect to see officers who deal with harrowing events such as these to have their pay benchmarked against a group including apprentice hairdressers: and yet this seems to be the direction the NPCC has taken.

³¹ <https://advice.milkround.com/the-times-guide-to-higher-and-degree-apprenticeships>

³² NPCC email communication dated 22nd September 2017.

2) Internal relativities

6.11.8 We further believe that, in addition to external benchmarking of pay, there should be consideration of internal relativities.

6.11.9 Under new proposals from the College of Policing there will be three new entry routes for police Constables, all of whom will be required to attain a level 6 (degree) qualification. These are a degree apprenticeship; entry following study for a policing degree (either with, or without Special Constable status); and a conversion programme for graduates in a non-policing discipline. Some will be expected to self-fund their degrees, and some will be funded through degrees. However, all will be expected to deliver the same role and take the same responsibilities. Consideration needs to be given to the distributive justice of pay.

6.11.10 In the table below, we have summarised these routes, and identified who funds both degree and practical training, and the training duration. Crucially we have also summarised the sworn status of officers entering by each route, as it is this that indicates what tasks and responsibilities officers have, and at what point during training.

Table 6.5: Summary of Police Constable Entry Routes (As of December 2017)

| | Police Constable Degree Apprenticeship | Pre-Join Degree in Policing (without Special Constable status during degree) | Pre-Join Degree In Policing (with Special Constable status during degree) | Degree holder (graduate) entry route |
|--|--|---|--|--|
| Curriculum | National Policing Curriculum for Police Constable (Apprenticeship version) | National Policing Curriculum for Police Constable (Pre-join degree version) | National Policing Curriculum for Police Constable (Pre-Join Degree version) | National Policing Curriculum for Police Constable (Graduate version) |
| Recruitment | Before completion of degree and practical training | After completion of degree but before completion of practical training | After completion of degree and practical training | After completion of degree but before completion of practical training |
| Duration of training programme | 3 years post-entry (degree and practical training) | 3 years pre-entry (degree training) Up to 2 years (during probationary period) post-entry (practical training) | 3 years pre-entry (degree and practical training) | 2 years post-entry (practical training) |
| Sworn status during academic and practical training | Regular police constable (during degree and practical training) | Not a sworn officer during degree training Regular police constable during practical training | Special constable (during degree and practical training) | Regular police constable (during practical training only) |
| Funding of degree qualification | Force-funded (apprenticeship levy) | Self-funded (via student loan) | Self-funded (e.g. via student loan) | Self-funded (e.g. via student loan) |
| Funding of policing training | Force-funded degree and practical training (apprenticeship levy) | Self-funded degree training Force-funded practical training | Self-funded degree <u>and</u> practical training (e.g. via student loan) | Force-funded degree and practical training |
| Payment during training | Student paid during degree and practical training | Student unpaid during degree Student paid during practical training | Student unpaid during degree and practical training | Student paid during practical training only |
| Probationary period | 3 years (concurrent with degree and | 2 years (concurrent with practical training but not degree training) | 2 years in addition to degree and | 2 years (concurrent with practical training |

| | | | | |
|---|---------------------------------|---|--|---|
| | practical training) | | practical training training (not concurrent) | but not degree training) |
| Abstraction time for training | 20% of contracted hours | Not specified | None | At least 20% of contracted hours ³³ |
| Qualification gained | Degree in Professional Policing | Degree in Professional Policing via academic training Practical training qualification – not specified | Degree in Professional Policing | Any Degree, and Graduate Certificate in Professional Policing |
| Independent Patrol status achieved | Will vary between forces | Will vary between forces | Pre-entry | Will vary between forces |
| Full operational competence achieved | Currently under consultation | Will vary between forces | Will vary between forces | TBC |

³³ In fact the current abstraction rate, which includes 18-20 weeks of IPLDP training, and 2-3 weeks classroom training in the first year is already higher than 20%.

- 6.11.11 In summary, only officers undertaking apprenticeships will have their degrees funded. We understand that the NPCC have therefore used the idea that apprentice Constables will be spending 20% of their time in degree and practical training to reduce their starting salaries by approximately 20%. But the table clearly shows that the abstraction time for Constables who already have a degree on entry is also at least 20%.
- 6.11.12 Moreover, there are anomalies across all the different entry routes, with sometimes one route offering more favourable terms, and sometimes another. For example, apprentices already may have longer probation. Officers doing a degree in policing while a Special Constable will have neither their degree nor their practical policing learning funded.
- 6.11.13 We believe all these features need to be taken into account, and cannot therefore support any pay recommendation that simply focuses on one route only, (the apprenticeship route), and on a single aspect of it, (the abstraction rate), without taking into account all elements of each route. This is likely to lead to perceptions of a lack of distributive justice within the pay system, and disillusionment.
- 6.11.14 Key to this, and for simplicity, we think the primary factor that should be taken into account is one that has not been mentioned by the NPCC in the opinion they have offered regarding apprentice pay. That is, apprentice level Constables will have sworn (warranted) status during practical training, in exactly the same way that those entering via other routes will have. This means that they will be conducting the same crucial tasks and responsibilities. We believe this could be the test should there be any possibility of challenge, for example on grounds of indirect discrimination.

6.11.15 We would welcome discussion of how the various anomalies can be addressed in such a way as to maintain distributive justice within the pay system. Further, we would welcome consideration of other ways in which value for money in apprentice funding can be attained on behalf of the public. For example, rather than lower apprentices pay, which may mean that they simply leave the police very early in favour of better paid work (as a graduate) we wonder whether apprentices should be asked to stay for a minimum period in policing, with agreed uplifts, and asked to repay some of their degree funding if they do not do so?

6.12 Independent benchmarking

6.12.1 We commissioned a short study by an independent organisation, Income Data Research. We asked them to gather information about the starting salary for any degree level apprenticeships they could (albeit we are aware there are few as yet established). Cognisant of the PRRB instruction to the NPCC to also consider progression, we also asked IDR to look at salaries of graduates in the workplace, and how their pay progresses in the first 3 and 5 years after employment. We also asked IDR to look at starting salaries for those who have already obtained a degree, as two of the three new routes into policing require recruits to have already obtained a degree prior to entry.

6.12.2 The findings provide a shocking contrast to the NPCC analysis.

6.12.3 In order to produce a comparison with the external market IDR looked at starting pay, and pay progression for other graduate occupations.

6.12.4 The IDR Graduate Survey 2017 shows the median graduate recruitment (starting) salary as being £27,000; the mean as £26,628; and the range £22,400 to £30,500. Clearly these salaries are significantly higher than the current starting salary range for officers, which is a minimum £21,169 (including the unconsolidated element from last year).

6.12.5 As well as salaries for graduates recruited in 2017, IDR collected current salary data from companies for the graduates they recruited five years ago, in 2012, and also for graduates they recruited three years ago, in 2014. This provides an estimate of pay progression at three and five-year intervals when measured against *the same company's* current graduate starter salaries. (Note this is a subset of the companies included in the whole Graduate Survey, and therefore the average and median salaries quoted for graduates are slightly, but not markedly different to those cited above). The details are set out below.

Table 6.5 Current salaries of graduate recruits³⁴, and after 3 and 5 years

| Benchmark data | | | |
|-------------------------|--|--|--|
| | 2017 graduate recruits' starting salary | Today's salary for 2014 graduate recruits (3 years post degree) | Today's salary for 2012 graduate recruits (5 years post degree) |
| Lower quartile | £25,000 | £32,000 | £35,500 |
| Median | £27,500 | £35,000 | £40,000 |
| Upper quartile | £27,476 | £35,381 | £40,994 |
| Average | £30,000 | £39,089 | £46,326 |
| Police Constable | | | |
| | Starting salary | After 3 years | After 5 years |
| | £20,169 | £26,538 | £32,940 |

6.12.6 It is clear from this analysis that the current salaries are not competitive for graduates. In all cases, the police salary is below the salaries of organisations included in IDR's benchmarking analysis. The Constable starting salary is almost £10,000 below the 2017 graduates' survey starting salary. Three years in the gap widens to just under £13,000, and 5 years in it is nearly £13,500.

6.12.7 IDR also provided a case study within the public sector that provide further context regarding officers' pay.

Case study: Paramedics

Unison described the structuring of pay for paramedics. The most common entry route is via a foundation degree in paramedic studies. This is delivered

³⁴ The companies included in this analysis by IDR were: Ageas, Aston Martin Lagonda, Audit Scotland, Bombardier Transportation, Cancer Research UK, John Lewis Partnership, Kier, Legal & General, Leonardo Helicopters, Mars UK, Mercer, National Grid, Nissan Motor Manufacturing UK, Airbus UK, Aker Solutions, Experian, Unilever

in a number of ways, such as entry to a university programme, internal progression onto a degree programme (while working) or part-time study (eg via the Open University). The university degree has a number of placement hours which must be fulfilled, and as a result trainee paramedics spend a lot of time 'on the job'. Most foundation courses are either 2 years (full-time) or 4 years (part-time). There is also a new apprentice paramedic qualification. Pay is structured according to the specific academic route. On completion of their paramedic qualification, registration with the HCPC and employment at an ambulance service in England or Wales, they start a Newly Qualified Paramedic (NQP) programme for a maximum period of 24 months. The basic starting salary is £22,128, ie Agenda for Change band 5 minimum (with a potential 25% extra for working unsocial hours and London weighting). In year 2 of the NQP programme the salary rises to a basic £22,683. At the end of the NQP programme the basic salary is £26,565 (ie the minimum for band 6 on the Agenda for Change pay scales).

3) The impact on policing

6.12.8 The third of our overarching concerns is that the NPCC recommendation on starting salary is narrowly focused on cost savings and a cursory attempt at benchmarking, rather than taking a strategic view of the impact on policing more broadly. For example, there appears to have been no Equality Impact Assessment, or any testing of the likely impacts on the calibre of recruits, on the recruit age profile, and so on.

6.12.9 In particular, we are concerned about the impact on equality. We have been told that the stated intent of the apprenticeship scheme is to increase diversity: that it will attract more BME and female candidates, and those from groups who do not traditionally tend to go to university. And yet entrants via this route will be paid less than other candidates. Is it really the case that the NPCC intend to pay the group that they believe will include a higher proportion of BME and female candidates a lower starting salary than all other groups? Not only that, but in absence of any clear pay progression plans for this group, it would appear that the disadvantage thus started will be compounded year on year. A full and proper Equality Impact Assessment of this plan must be undertaken. Given the legal requirement for forces to conduct Equal Pay Audits in the future, the NPCC is blindly heading down a path that will further worsen the existing pay inequalities.

6.12.10 Additionally we believe that if the pay is set too low, this route will only be attractive to very young recruits. Currently the average starting age is late 20s. We believe that maturity and the development of life skills, such as dealing with a range of people, are essential in policing.

6.12.11 We do not believe the NPCC and CoP have taken into account the possibility that apprentices may only stay in policing long enough to obtain a degree, and will then leave for better paid employment if the progression is not commensurate with other post-degree jobs). If this is the case, then the hidden costs of the scheme caused by increased turnover, loss of skills, and the need to constantly replenish the supply of apprentices may create poor value for money and a poorer service for the public.

6.12.12 As we noted in our submission last year:

“The introduction of the apprenticeship scheme has been hurried through, in what seems to be a reaction to the apprenticeship levy. The College of Policing have had to meet a number of extremely challenging deadlines. In that context it is perhaps not surprising that the focus appears to have been on the scheme development requirements and design. Broader issues pertinent to workforce planning have not formed part of the College’s work. There has not been a robust analysis of what the offer to candidates actually is; to whom it will be attractive; and whether it might change the nature of recruits to policing, and policing careers, in unintended ways, as well as those intended.

The staff associations support professional development. However, we are concerned that the apprenticeship scheme may attract younger recruits who want to obtain a degree and leave the service, rather than stay in policing. Our concern is that this may create both a shift in the age of recruits, and higher turnover, which together will result in a service with higher proportions of young officers. This could be detrimental to the aspiration that the service should reflect the community, and it could also mean a loss of more mature recruits with life and interpersonal skills that the service hopes to attract.

*In order to offset some of these concerns, and continue to attract a wider range of age groups (the average age of police recruits is 28), as well as to maintain fairness, we recommend that apprentices are paid in accordance with Regulations in the same way that other recruits are. That is, they should be paid within the band £19 to £22,000, with those with prior policing experience being able to attract the higher starting salary”.*³⁵

6.13 Recommendation on apprentice starting pay

6.13.1 At the moment we see no evidence to support a move away from our position last year. That is, apprentices should be offered a starting salary within the existing pay scale, without a lower spine point being included. That is, apprentices should be paid between spine point 0 - £20,169, and spine point 1 - £23,352. These figures take into account including last year’s 1% consolidated and the unconsolidated component, and should be uplifted in accordance with any general uplift this year.

6.13.2 Furthermore, this is the only mechanism by which to consider apprentices’ pay that allows for a clear pay progression path that is already in Regulations and is compatible with the progression of those who take other routes into policing. It is worrying that the NPCC do not seem to have considered progression when suggesting a £18,000 starting point.

³⁵ PFEW Research and Policy Support Department: Submission to The Police Remuneration and Review Body on behalf of the Police Federation of England and Wales (PFEW) and the Police Superintendents’ Association of England and Wales (PSAEW) 12th December 2016.

Section 3. to review final NPCC proposals for time-limited, targeted payments to address specific recruitment and retention pressures

6.13.3 At the time of writing only one meeting has been held to discuss these (a PCF working group, on 20th December 2017).

- During the meeting the NPCC were asked for their proposals on short term targeted pay. The NPCC had no proposals available.
- The NPCC were asked how “hard to fill roles” were defined. The NPCC had no firm definition or list.
- The NPCC were asked by other attendees including the APCC and staff associations to provide a clear policy intent, and a list of hard to fill roles, with the definition.
- At the time of writing, these have not been provided.
- The PSA fielded a proposal for Superintendents: this was rejected by the NPCC.
- The NPCC mentioned a number of ideas as to how targeted pay might be developed, including shift allowances.

6.13.4 These indicate little progress, as the NPCC have not offered firm proposals.

6.13.5 We are extremely concerned that the NPCC asked for targeting of pay to be in last year's remit letter, and again in this year's, and yet no progress seems to have been made.

6.13.6 If the NPCC has money available for targeting that cannot be used because it has failed to develop plans, then we would like to see this fairly distributed to all members. Officers should not be penalised because of the NPCC failure. This should be used to ensure last year's uplift is consolidated. It cannot be right that, on the one hand the NPCC tell us it cannot afford to consolidate last year's uplift, while on the other hand it ask for a mechanism for targeting (presumably meaning money is available). This seems disingenuous.

6.13.7 As with all pay, we believe that it is crucial that proper consideration is given to equality issues in the design of any targeting. We have been given no reassurance from the meeting so far that this is the case.

6.14 Recommendation regarding short term targeting

6.14.1 We respectfully request that the NPCC engage fully in the PCF process. It is essential that proper representation is given. This includes bringing written proposals to the table, and allowing staff association representations to be made.

6.14.2 It is not currently possible to recommend any specific short term targeting as the NPCC have not provided cases.

Section 4. to provide observations on NPCC reform proposals, including the timetable.

6.14.3 Unfortunately at the time of writing we haven't seen a timetable for pay reform, nor firm proposals. We have asked for these at every meeting of the Police Consultative Forum, and in writing on several occasions.

6.14.4 This includes a lack of a timetable for the setting of apprenticeship pay, which we understand is to be done outside the normal timetable for the PRRB. For the staff associations to be able to engage in this process and add value, we must be given a timetable and allowed to plan our own work accordingly.

6.15 Additional matters

6.15.1 On the 3rd of November 2017 the PRRB wrote to all parties stating what evidence they wish to see in this year's pay round.

6.15.2 We welcome the provision of this list. We believe it is incumbent on the employer to provide much of this analysis. However, we are disappointed that we still have not seen much progress towards so doing. In particular, a timetable for pay proposals and reform, better data for workforce planning and for tracking the success or otherwise of initiatives, and a nationwide officer survey should be priorities. In some cases the PRRB has been seeking these from the employer for the entire four years during which it has existed.

6.15.3 We had hoped that there would be open and transparent sharing of any data in advance of the PRRB round. Notwithstanding the fact that the NPCC may provide this direct to the PRRB, the following table sets out where the staff associations have been made aware of data, and where we have not.³⁶

Table 6.6: PRRB data requests

6.15.4 The table below refers to the position on the 31th January, 2 working days before the PRRB submissions are due. On the 31st January the NPCC sent a number of annexes that we understand will be included in the NPCC submission. The staff associations and Associations of Police and Crime Commissioners (APCC) have notified the NPCC that this is too late for us to be able to assess and respond in the timescales required.

| PRRB reference and data requested | Whether provided |
|---|--|
| Para 2.15 – further evidence on the nature of changes to the policing environment and the effect on police officers. | Not provided |
| Para 2.34 – further evidence on affordability considerations including efficiency plans of police forces. | Not provided |
| Para 2.81 – the NPCC to provide a complete analysis of shortage groups covering all police forces. | Not provided |
| Para 2.83 – analysis of annual recruitment data including the numbers applying, the quality of applicants, and the numbers joining plus data on the reasons for not joining and early leavers. Also data and assessments on the range of recruitment initiatives underway – Police Now, BME Progression 2018, direct entry superintendent, direct entry inspector and fast track inspector. | Not provided. The PFEW have begun surveys of new starters and leavers, and are happy to provide reports to the PRRB if that would be of assistance. (NB the data sent on the |

³⁶ Email dated 3rd November 2017, from Ian Dunlop, OME, to all parties to the PRRB.

| | |
|---|--|
| | 31 st Jan contains some information regarding numbers of successful candidates by ethnicity and gender, but not regarding quality of applicants, nor attitudinal data regarding joiners and leavers). |
| Para 2.86 – retention data including retention rates by length of service and the reasons behind voluntary resignations. Assessments might include: early years retention; levers to retain mid-career officers; and retaining specialist or shortage groups. | See annex C for fuller commentary. |
| Para 2.99 – the NPCC should address the absence of a national survey of police officers. | This has not been addressed. We understand the “Durham” survey has been rolled out to a number of forces, but not to all. We continue to be concerned that the employer has no national survey of officers. |
| Para 2.103 – assessing the equality impact of pay proposals for reform, including any interim proposals, and force level assessments when implementing local flexibilities. | Not provided. |
| Para 3.24 – any review of allowances should re-establish the rationale, the evidence base and the arrangements for regular review. | Not provided. |
| Para 3.25 – the early review of On-call Allowance. | Not provided. |
| Paras 3.28 – the review of the London and South East package as part of wider pay reforms. | Not provided. |
| Para 3.39 – evidence on pay rates for police office apprentices including the implications for recruitment, the design of the programme, estimated numbers, training costs, abstraction rates and implementation strategy. | We were informed of the NPCC intent to recommend a starting salary of £18,000 on 22nd January 2018. No paper / written proposal as yet. We are not aware of any estimated numbers, |

| | |
|--|---|
| | and so on. |
| Para 3.41 – longer term evidence on systematic workforce planning and how apprenticeships will change the recruitment landscape for policing. | Not provided. |
| Para 3.52 – assessments of shortage groups including overall supply problems, ineffective career pathways, the nature of the shortage and the levers to alleviate. | Not provided. |
| Paras 3.57 – updates on the developments of arrangements to allow local flexibility to chief officers to make additional payments to officers in hard to fill roles and in superintending ranks. | A PCF working group meeting was held in late December. No proposals were provided. |
| Para 4.31 – update on an integrated police workforce and pay reform plan through to 2020 specifying the strands of reform, their purpose, lead responsibilities and the implementation strategy. | Not provided. |
| Para 4.35 – update on progress against the three PEQF routes including assessments of the graduate market, competition with other sectors, and career and pay progression. | We are aware through College of Policing meetings of progress re the PEQF routes, but these do not cover pay. |
| Para 4.36 – the outcomes of Advanced Practitioner pilots. | Not provided. |
| Para 4.37 – for the 2018/19 pay round, the NPCC to produce a plan for pay reform setting out key activities, timelines and resources to deliver a new pay structure. | Not provided. |
| Para 5.3 – evidence on a more flexible approach to pay awards including a pay bill approach to manage pay awards and other elements of the package within overall parameters. | Not provided. |

6.15.5 Unfortunately this means that the staff associations go into this round unsighted.

6.16 Recommendation on pay reform

6.16.1 At this point, we are unable to comment further on the proposals and timetable for reform, due to lack of information. We are extremely concerned at the lack of rationale and evidence provided: we do not believe that proper attention has been given to considering alternatives, or unintended consequences. We do not believe that systematic appraisal of what is required, what methods might achieve these, and how these would affect current and future policing (both positively and negatively) has been undertaken. The apprenticeship scheme is an example of this.

6.16.2 It is essential - to recreate positive employee relations and to enable the PRRB to fulfil its function properly - that the NPCC now puts the requisite effort and resource into attending to the matters that the PRRB has asked it to: namely the production of appropriate evidence where change is requested, and full engagement in the PCF process.

**ANNEX A: letter to the Chair of the PRRB, from the PFEW
General Secretary, sent 8th December 2017**

Police Federation



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Established by Act of Parliament

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GENERAL SECRETARY'S OFFICE

To:
Mr David Lebrecht
Chair of the Police Remuneration Review Body
c/o Ian Dunlop
PNCARRB Secretariat
Office of Manpower Economics
8th Floor Fleetbank House
2-6 Salisbury Square
London EC4Y 8JX

Re. The Police Remuneration Review Body Remit 2018/19 (dated 7th December 2017)

Dear David

I am writing to you regarding the Police Remuneration Review Body remit letter for 2018/2019, which we have had sight of today.

I am deeply concerned about the content of the remit letter, and the position that it puts us both in: you, as the independent body responsible for setting police pay, and me, as the General Secretary of the staff association charged with representing the best interests of 119,000 officers.

My concern stems from the impression given in the letter that the NPCC plans are more advanced than I believe them to be. Either the plans are advanced, and have not been shared, or they are not advanced, and both you and I are being expected to comment on plans that are unformed– and yet that are of significant concrete importance to officers. Either situation causes difficulties.

We understand you are being asked to consider how the pay award will *“support overarching NPCC proposals and timetable for a new pay structure”*. But the NPCC still have not provided proposals. Whilst there has been discussion of new structures such as Advanced Practitioners and so on, none of these seem to have progressed since last year, and none are yet formed sufficiently to be firm proposals regarding how they will work operationally, nor for pay. Certainly no written proposals have been shared with the staff associations.

Specifically, the remit letter states that:

“I see PRRB continuing to play a key role in reviewing the next stage of NPCC’s plans for a new reward structure work and providing observations on the first tranche of proposals put forward by NPCC, who will provide the bulk of the evidence this year”.

Given the lack of plans to date, at best this means you (as Chair of the PRRB) will have sight or discussion of these plans during the submission process between now and the 5th of February 2018, but I (as the staff association General Secretary) will not. How can we as a staff association be expected to consider this to be a fair process for our members? Unfortunately it plays into the worst suspicions of those who have been vocal in saying the PRRB process takes away the staff association’s voice. And for you, it creates significant challenges in terms of being able to identify any unintended consequences, or the degree to which it is an acceptable and workable solution for officers.

The letter goes on to state the following as key matters for this year:

“1. how to apply the pay award for 2018/19 for police officers of all ranks, including chief officers, in accordance with the Chief Secretary’s letter and in the context of how it will support overarching NPCC proposals and timetable for a new pay structure”;

As noted, we have not had sight of the proposed pay structure, nor detailed timescales.

“2. NPCC proposals for police officer apprenticeship pay, which will need to be considered outside of the usual reporting timetable - as you are aware, apprenticeships will be introduced in forces next year and we are expecting sector agreement on linked pay proposals early in the New Year. NPCC have committed to circulate proposals to partners in good time so that you are able to consider them alongside the main body of written evidence. To allow adequate time for consultation before any changes are applied, it will be important to obtain PRRB’s observations by the end of April 2018 in advance of your main report;”

It is hugely disappointing that pay for officers entering via the degree apprenticeship route was on the remit letter last year, but could not be determined due to lack of proposals: and yet no real progress has been made towards reaching agreement. I would ask what is meant by the NPCC promise of circulation of proposals *“in good time”* so they can be considered alongside the main body of evidence. Given that we have received this remit in December, and are expected to provide a response by the 5th February, surely we should have sight of these firm proposals by now? Do you know when you are expecting to receive these, and are you content that all parties will have

sufficient time to review and respond in a considered manner? If we are to receive these during the lead up to submissions into the PRRB, then I feel it is essential that we know when that will be, so that we can plan accordingly.

“3. to review final NPCC proposals for time-limited, targeted payments to address specific recruitment and retention pressures;”

Following last year’s PRRB, it was agreed that these matters would be considered in a Police Consultative Forum Working Group. This group has not yet met for the first time, so it seems rather premature to suggest that the PRRB will be able to review “final” proposals. Again, the lack of progress means that we as a staff association have not had any time to consider these, prior to being expected to put evidence into the PRRB.

“4. to provide observations on NPCC reform proposals, including the timetable.”

All my comments above apply.

Pay is extremely important to our members: I feel it’s too important an issue for 119,000 officers not to have a voice. The remit letter also places the PRRB in the difficult position of having to make recommendations based on incomplete information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Fittes', is written over a light grey rectangular background.

Andy Fittes

General Secretary

Annex B: Workforce data (Home Office collated)

1. Data accuracy, comprehensiveness and transparency

- 1.1. The majority of the workforce data we examine within this document was collated Home Office (HO),³⁷ to the best of our knowledge these data have been interpreted appropriately and accurately.³⁸
- 1.2. Although there are, as noted in our previous submissions to the PRRB,³⁹ a number of challenges with these data sets in terms of accuracy, comprehensiveness and transparency, the PFEW would like to acknowledge that the HO is taking steps towards improving their police workforce data.
- 1.3. The PFEW has been promoting an evidence based approach towards police workforce planning for a number of years, and as such, welcome this recent drive by the HO to improve their police workforce data.
- 1.4. Table 1. below compares the public availability of key national recruitment and retention data in 2014, the first PRRB submission round, and that which is available now.
- 1.5. As mentioned in our first submission to the Police Pay and Remuneration Review Body (PRRB),⁴⁰ there are some capacity data that are almost always appropriate to collect and analyse to ensure adequate workforce management. This includes snap

³⁷ For more details please visit: <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2017>

³⁸ Please note – all officer numbers are presented in full-time equivalent figures. There may appear to be small discrepancies between the totals and the sums of the constituent items as the figures are presented to the nearest whole number but are actually provided unrounded.

³⁹ The Police Federation of England and Wales. (2015). Submission to the Police Pay and Remuneration Body on behalf of the Police Federation of England and Wales (PFEW) and the Police Superintendents' Association of England and Wales (PSAEW); The Police Federation of England and Wales. (2016a). Submission to the Police Pay and Remuneration Body on behalf of the Police Federation of England and Wales (PFEW) and the Police Superintendents' Association of England and Wales (PSAEW); The Police Federation of England and Wales. (2016b). Submission to the Police Pay and Remuneration Body on behalf of the Police Federation of England and Wales (PFEW) and the Police Superintendents' Association of England and Wales (PSAEW).

⁴⁰ The Police Federation of England and Wales. (2015). Submission to the Police Pay and Remuneration Body on behalf of the Police Federation of England and Wales (PFEW) and the Police Superintendents' Association of England and Wales (PSAEW).

shot data, such as: recruitment data, overall numbers, joiners, leavers, unfilled posts, internal talent flow, wastage predictions, and plans for redressing any gaps.

1.6. Although some progress has been made, the majority the data required for meaningful analysis of police workforce recruitment and retention patterns still do not exist on a national level. For example, there is still no national data set on the calibre of applicants who apply to become members of the police service.

1.7. Without this data we cannot adequately explore whether the existing pay and conditions are sufficient to recruit and retain sufficient and suitably qualified officers, nor can we ensure that recruitment and retention planning is clear and accountable.

Table 1: Public Availability of Key Police Workforce Data Comparison 2014 to 2017

| Data type | | Data availability | | |
|-------------|--|--|-------------|-------------|
| | | 2014 | 2017 | |
| Recruitment | Total vacancies | Broken down by: | | |
| | | • Force | Unavailable | Unavailable |
| | | • Role | | |
| | • Rank | | | |
| | Applicants | Broken down by: | | |
| | | • Applicant type (e.g. internal promotion, internal secondment/transfer, external recruit) | Unavailable | Unavailable |
| | | • Candidate quality (match to job specification) | | |
| | | • Outcome (e.g. successful/unsuccessful) | | |
| | | • Force | | |
| | | • Role | | |
| | | • Rank | | |
| | • Personal demographics (e.g. gender, ethnicity) | | | |
| | Intake | Broken down by: | | |
| | | • Joiner type (e.g. internal promotion, internal secondment/transfer, external recruit) | Unavailable | Available |
| | | • Candidate quality (match to job specification) | Unavailable | Unavailable |
| • Force | | Available | Available | |
| • Role | | Unavailable | Unavailable | |
| • Rank | | Available | Available | |

| Data type | | Data availability | | | |
|--|--------------------|---|-------------|-------------|--|
| | | 2014 | 2017 | | |
| | | <ul style="list-style-type: none"> Personal demographics (e.g. gender, ethnicity) | Available | Available | |
| Retention | Outflow | Broken down by | | | |
| | | <ul style="list-style-type: none"> Leaver type (e.g. voluntary resignation, transfer, retirement etc.) | Unavailable | Available | |
| | | <ul style="list-style-type: none"> Reason for leaving | Unavailable | Unavailable | |
| | | <ul style="list-style-type: none"> Force | Available | Available | |
| | | <ul style="list-style-type: none"> Role | Unavailable | Unavailable | |
| | | <ul style="list-style-type: none"> Rank | Available | Available | |
| | | <ul style="list-style-type: none"> Personal demographics (e.g. gender, ethnicity) | Available | Available | |
| | Promotions | Broken down by | | | |
| | | <ul style="list-style-type: none"> Force | Unavailable | Available | |
| | | <ul style="list-style-type: none"> Role | Unavailable | Unavailable | |
| | | <ul style="list-style-type: none"> Previous rank | Unavailable | Unavailable | |
| | | <ul style="list-style-type: none"> New rank | Unavailable | Available | |
| | | <ul style="list-style-type: none"> Personal demographics (e.g. gender, ethnicity) | Unavailable | Available | |
| | Workforce strength | Broken down by | | | |
| | | <ul style="list-style-type: none"> Force | Available | Available | |
| | | <ul style="list-style-type: none"> Role | Available | Available | |
| | | <ul style="list-style-type: none"> Rank | Available | Available | |
| | | <ul style="list-style-type: none"> Skill mix | Unavailable | Unavailable | |
| <ul style="list-style-type: none"> Personal demographics (e.g. gender, ethnicity) | | Available | Available | | |

1.8. Nevertheless, the PFEW would like to thank the HO for extending an invitation to work together towards improved police workforce data via attendance at their Police Workforce Data Working Group, organised as part of the Police Advisory Board (PAB). We acknowledge that this is an important forum for discussing the current data deficits and

exploring ways of working towards improvement, and as such, have ensured our attendance at each meeting.

1.9 In order to effectively represent our members' interests in matters of pay and conditions, we need access to key information that is currently unavailable to us, and as such, view these meetings as an important forum for discussing the current data deficits and exploring ways of working towards improvement. It is for this reason that PFEW has ensured attendance at each meeting and hope that going forward, the HO will continue to consider the PFEW a key stakeholder and provide further opportunities for additional consultation, feedback and discussion as and when appropriate.

2. Objective evidence regarding the numbers of officers recruited

2.1. The intake data in Table 2 shows that standard direct recruits account for the vast majority of the service intake, with the last few years showing a dip and subsequent rise in the number of re-joiners. Given that the College of Policing are currently creating policies aimed at encouraging officers to leave and return to the service, it may be prudent to monitor these data to gauge their success.

Table 2 Intake type by year⁴¹

| Year and data type | | Transfer | Standard direct recruit | Other Joiners | | Total Joiners incl. transfers | Total joiners excl. transfers |
|--------------------|-----------------|----------|-------------------------|------------------------------|------------|-------------------------------|-------------------------------|
| | | | | Previously special constable | Re-joining | | |
| 2010/11 | No. of officers | 456 | 1570 | 93 | 78 | 2197 | 1741 |
| | % | 21% | 71% | 8% | | | |
| 2011/12 | No. of officers | 244 | 1703 | 385 | 65 | 2396 | 2152 |
| | % | 10% | 71% | 19% | | | |
| 2012/13 | No. of officers | 478 | 1398 | 427 | 55 | 2358 | 1880 |
| | % | 20% | 59% | 20% | | | |
| 2013/14 | No. of officers | 833 | 3400 | 1331 | 24 | 5588 | 4755 |
| | % | 15% | 61% | 24% | | | |
| 2014/15 | No. of officers | 746 | 5302 | 785 | 33 | 6866 | 6120 |
| | % | 11% | 77% | 12% | | | |
| 2015/16 | No. of officers | 618 | 3654 | 455 | 28 | 4755 | 4137 |
| | % | 13% | 77% | 10% | | | |
| 2016/17 | No. of officers | 1142 | 5448 | 867 | 68 | 7526 | 6383 |
| | % | 15% | 72% | 12% | | | |

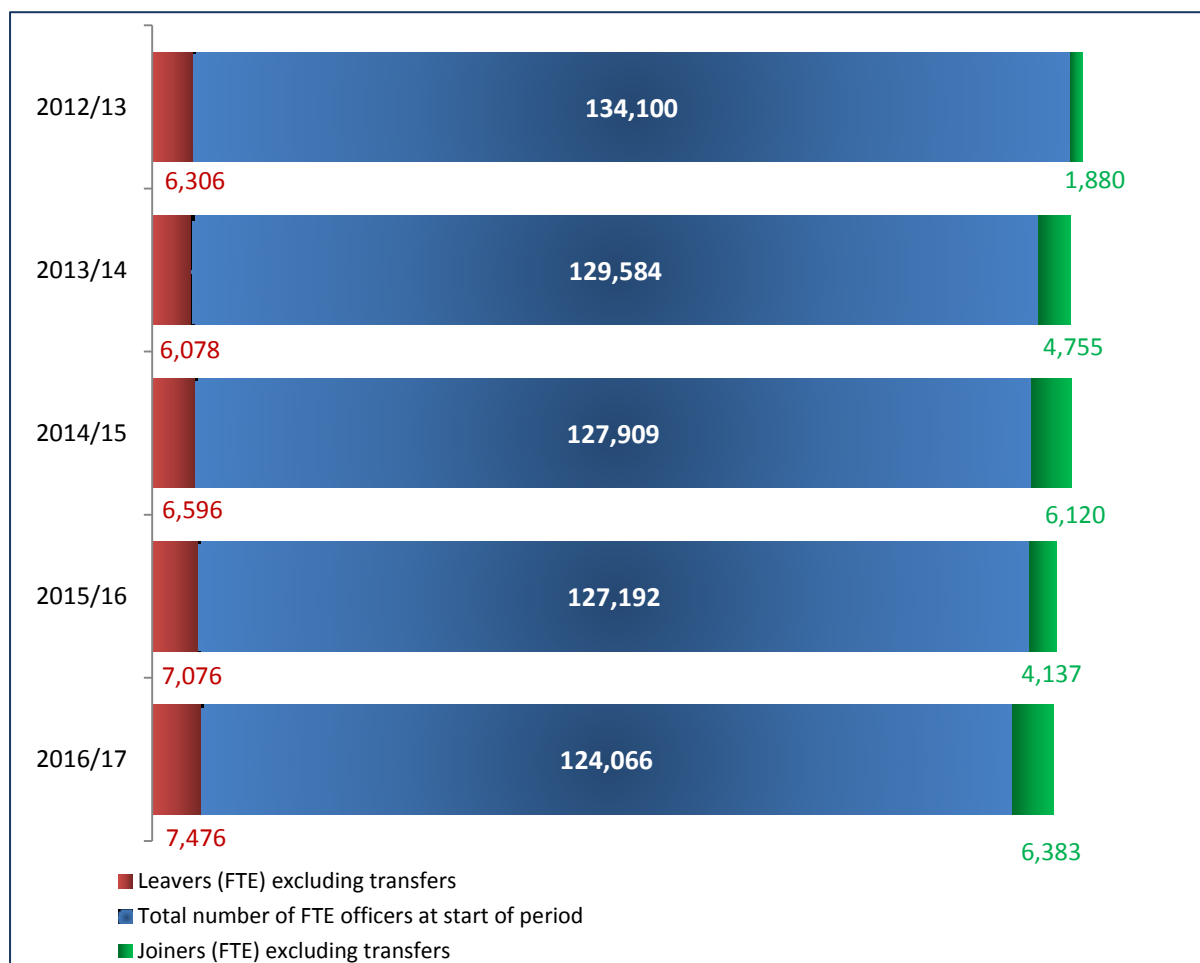
⁴¹ Home Office. (2017). Police workforce, England and Wales, 31 March 2017: joiners data tables [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-open-data-tables>.

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3. Objective evidence regarding the numbers of officers retained

- 3.1. As mentioned previously, although there is still a deficit in appropriate data for analysing recruitment and retention of officers, the HO does now supply additional information on an annual basis. These additional data sets, amongst other things, included historical information on types of intake and outflow, that were previously unavailable.
- 3.2. Graph 3 shows the number of officers (FTE), joiners and leavers (excluding transfers) over a 5-year period highlighting that the gap between the number of leavers and the number of joiners has been slowly closing – slowing the rate of officer reductions year on year. However, there has been another drop in officers numbers between 2016 and 2017, 924 FTE officers to be exact, and Table 4 highlights that the officer turnover rate has been slowly increasing since 2010/11.

Graph 3: Leavers,⁴² Joiners⁴³ and the Number of Full Time Equivalent (FTE) Officers⁴⁴ across 2012-2017⁴⁵



⁴² Home Office. (2017). Police workforce, England and Wales, 31 March 2017: leavers data tables [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-open-data-tables>

⁴³ Home Office. (2017). Police workforce, England and Wales, 31 March 2017: joiners data tables [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-open-data-tables>

⁴⁴ Home Office. (2017). Police Workforce, England and Wales, 31 March 2017 [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2017-data-tables>

⁴⁵ Please note that both 'Leavers' and 'Joiners' data refers to officers who have left or joined between the April and March, whilst the number of FTE Officers reflects a head count taken on the 31st of March at the beginning of the period. Data excludes transfers.

Table 4: Officer Turnover Rate 2010/11-2016/17 ^{46, 47}

| Year | No. of Officers | Total No. of Leavers | Turnover rate |
|---------|-----------------|----------------------|---------------|
| 2010/11 | 143,734 | 6293 | 4.4% |
| 2011/12 | 139,110 | 6535 | 4.7% |
| 2012/13 | 134,100 | 6306 | 4.7% |
| 2013/14 | 129,584 | 6078 | 4.7% |
| 2014/15 | 127,909 | 6596 | 5.2% |
| 2015/16 | 127,192 | 7076 | 5.6% |
| 2016/17 | 124,066 | 7476 | 6.0% |
| 2017/18 | 123,142 | - | - |

3.3. When breaking down the outflow data down into types of leavers, you can see that the second largest group of leavers are voluntary resignations, and that there has been an upwards trend in this data since 2011/12 (Graph 5, Table 6). When considered vis a vis the economic trends of the last few years, such as annual unemployment, an interesting pattern appears that may offer support the below supposition, which was included in our first PRRB submission:

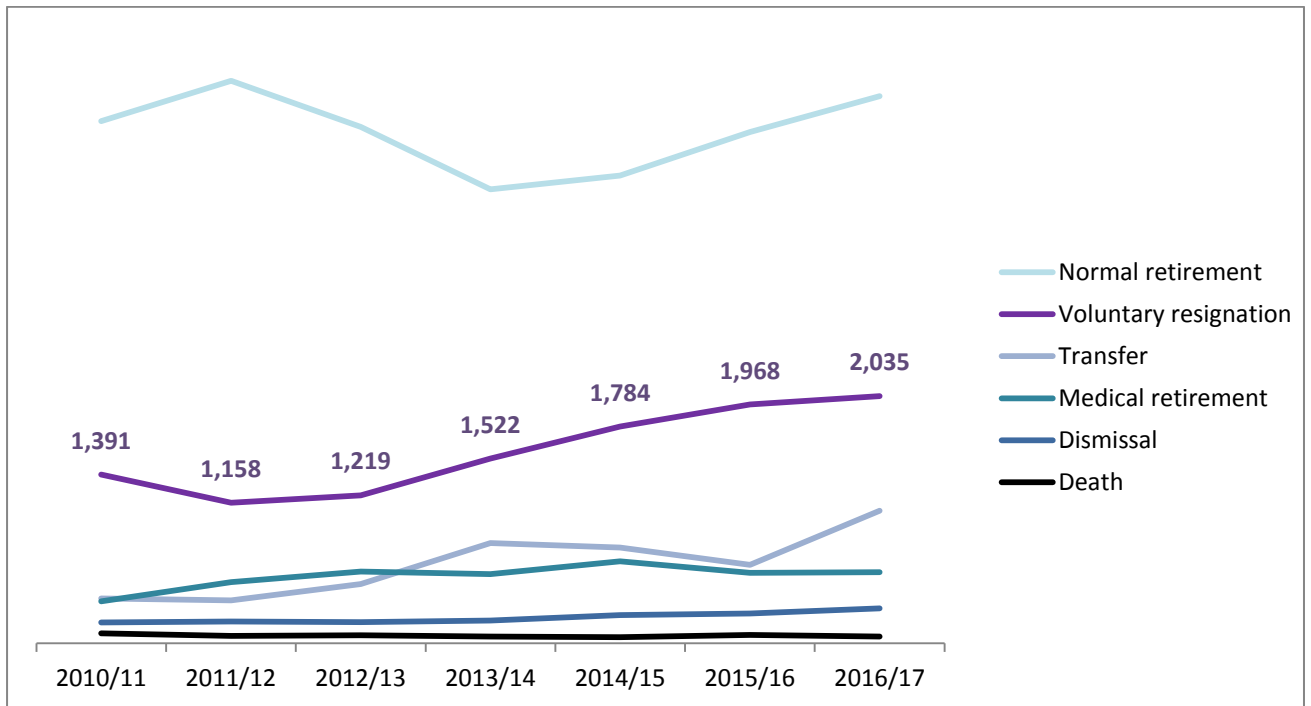
“The recent austerity and shrinking job market may have caused a reduction in competitive remuneration. Therefore, it would be worth noting that officers who haven’t left during recession may well leave upon economic upturn. Recent research has found a correlation between unemployment rates, consumer confidence and voluntary turnover rates; suggesting that as economic fears recede, voluntary turn over rises.” ⁴⁸

⁴⁶ Leavers' data refers to officers who have left between the April and March, whilst the number of FTE Officers reflects a head count taken on the 31st of March at the beginning of the period. Data excludes transfers

⁴⁷ Figures derived from: Home Office. (2017). Police workforce, England and Wales, 31 March 2017: leavers data tables [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-open-data-tables> ; Home Office. (2017). Police Workforce, England and Wales, 31 March 2017 [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-england-and-wales-31-march-2017-data-tables>

⁴⁸ The Police Federation of England and Wales. (2015). Submission to the Police Pay and Remuneration Body on behalf of the Police Federation of England and Wales (PFEW) and the Police Superintendents' Association of England and Wales (PSAEW), page 71.

Graph 5: Outflow type by year⁴⁹



⁴⁹ Home Office. (2017). Police workforce, England and Wales, 31 March 2017: leavers data tables [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-open-data-tables>

Table 6: Outflow type by year⁵⁰

| Year and data type | | Transfer | Voluntary resignation | Other Leavers | | | |
|--------------------|-----------------|----------|-----------------------|---------------|-----------|--------------------|-------------------|
| | | | | Death | Dismissal | Medical retirement | Normal retirement |
| 2010/11 | No. of officers | 371 | 1391 | 84 | 172 | 347 | 4300 |
| | % | 6% | 21% | 74% | | | |
| 2011/12 | No. of officers | 354 | 1158 | 60 | 179 | 505 | 4632 |
| | % | 5% | 17% | 78% | | | |
| 2012/13 | No. of officers | 489 | 1219 | 67 | 175 | 591 | 4254 |
| | % | 7% | 18% | 75% | | | |
| 2013/14 | No. of officers | 826 | 1522 | 57 | 189 | 570 | 3739 |
| | % | 12% | 22% | 66% | | | |
| 2014/15 | No. of officers | 790 | 1784 | 52 | 233 | 676 | 3851 |
| | % | 11% | 24% | 65% | | | |
| 2015/16 | No. of officers | 648 | 1968 | 69 | 247 | 582 | 4211 |
| | % | 8% | 25% | 66% | | | |
| 2016/17 | No. of officers | 1093 | 2035 | 57 | 289 | 587 | 4507 |
| | % | 13% | 24% | 63% | | | |

⁵⁰ Home Office. (2017). Police workforce, England and Wales, 31 March 2017: leavers data tables [data tables]. Retrieved from: <https://www.gov.uk/government/statistics/police-workforce-open-data-tables>

Annex C: Correspondence sent to the NPCC regarding benchmarking methodology and data

From: Head of Research, PFEW, 5th June 2017, to NPCC National Co-ordinator of pay

Thanks for meeting us here at PFEW on 30th May.

We discussed again the possibility of benchmarking police officer pay vis a vis external sources, with a view to using this in future workforce modernisation plans, and NPCC PRRB submissions. You referred to the CoP role profiles that you have seen to date, and we agreed that as they currently stand these are incomplete and of relatively limited value in setting pay, until they have been fleshed out to cover a range of roles, rather than what we have seen so far, which is a single profile for each rank.

As in previous meetings, we discussed the fact that police officers carry out a unique role. It would be difficult to choose a single external role to benchmark against. You have previously asked for a view on appropriate roles to benchmark against. I understand that since our last conversation you have considered benchmarking against the Armed Forces: however we agreed there are significant differences in the jobs. The Armed Forces, for example, have much less direct interaction with the public, and are likely to have differing requirements regarding interpersonal skills, and ability to persuade members of the public and calm situations. Likewise you mentioned fire officers, and I believe that would be appropriate from the point of view of conducting a dangerous role, but not necessarily from the perspective of including softer interpersonal skills, or certain role based skills. There is therefore no single overall global comparator.

We discussed the concept of having a matrix of types of knowledge, skills, and behaviours potentially needed in policing, and a range of jobs for benchmarking purposes, which are likely to require some, but not all, of the same types of skills. There is a possibility of using such an approach for benchmarking, weighting each job component, and arriving at a way of deriving an appropriate weighting which would ultimately feed into the pay mechanism for policing.

I said I would suggest such a matrix to you by email, with a view to building on that in future. Please note I have not yet had a chance to discuss this way forward internally with Andy, but I believe given our previous PRRB submissions that PFEW will be willing to consider pay structures that are evidence based. Further, as a minimum with regard to benchmarking, we would expect any such work to follow a systematic process in order to adequately compensate for each Knowledge component / Skill / Attribute (KSA), rather than be a “gut feel” global comparison.

With that in mind, I would suggest the following matrix might be built upon. This draft is not intended to be in any way definitive – I am simply supplying it to get the ball rolling, as I understand you will be coming under increasing time pressure now that you are some months into your role.

I hope you will find this helpful in structuring thoughts: I think its important to capture something on paper at this stage.

As previous conversations, we are happy to help host workshops etc as and when you are ready to do so. If you could share your thoughts regarding what you foresee as the likely process and timescales that would be extremely helpful.

| Type of Knowledge, Skill, Attribute | Job comparator | Degree to which this KSA affects overall remuneration in comparator, and therefore should in policing | Overall actuarial evaluation of role |
|--|---|--|---|
| Educational qualifications - entry knowledge requirements (eg degree level) Qualifications required at higher ranks | Teaching? NHS? Other public service? | TBC | |
| Soft skills - Interpersonal skills (dealing with public) Line management skills at Sgt and above | NHS roles (nurse / doctor)? Service industry roles? Social workers? | TBC | |
| Core competences required by all (eg IPLDP) First aid Legal | NHS roles? | TBC | |
| Specialist skills, where appropriate (eg firearms training; cyber skills; investigative skills) | Specialist IT? Research roles? Specialist finance roles | TBC | |
| Special circumstances (eg danger) | Fire brigade? | TBC | |

From: Head of Research, PFEW, 5th June 2017, to NPCC National Co-ordinator of pay

Just a quick note to say thank you for visiting on Friday, and meeting with Fran and I.

We appreciated hearing about your current plans for data collection, and hope that our feedback was useful. I think it is really important to get a shared perspective on what evidence will be provided to the PRRB and will be deemed by all parties to be appropriate. I am conscious that we have had several such meetings now, and we have heard about various strands of your activity. It would be extremely useful for us to have a written document – even just a list – of what these strands are: otherwise it can feel to us as though we have discussed projects that may or may not be continuing, or that you may ultimately have decided against enacting. For example, we talked at length at one stage about benchmarking, and about joint activity. We would be happy to work jointly where possible, but timescales would be extremely helpful, as would a list of activities.

I understand that Fran has sent you some further information since the meeting, in the form of the questionnaire. I have to confess I think you possibly already had that? Again, we are very happy to share information, and have previously sent full Regs, and various reports. We do so in the hope that we are developing a positive, reciprocal informal working relationship. I'm sure you would agree we invested considerable time in assisting when you were developing the survey you sent out re recruitment and retention issues, to forces. I understand from our meeting on Friday that you have the results available from that, and I appreciate that you offered on Friday to share that. My list of information that we are expecting from you following Friday's meet is as follows:

- The results from the survey to forces re recruitment and retention
- The apprenticeship data / draft report that you are working on, based on data from the OME. (Alternatively even just the titles of the reports you accessed would be helpful).
- I believe you said you also had data from the OME re new entrants (for benchmarking purposes? Was this graduate level pay data?)

I'd be grateful for this information.

If you would like further information from us, please do let me know. Requests should come to me as Head of Department. I will try to meet all requests: it will be important though that information sharing is seen by stakeholders to be equal and balanced between all parties.