



Submission to the Police Remuneration Review Body on behalf of the Police Superintendents' Association and the Superintendents' Association of Northern Ireland 2023/24



14th February 2023

Chair,
Police Remuneration Review Body

Dear Ms Zoë Billingham,

I enclose our submission to the Police Remuneration Review Body for the 2023/24 pay round. This is a joint submission made on behalf of the Police Superintendents' Association and the Superintendents' Association of Northern Ireland.

Yours sincerely,

Dan Murphy KPM BA(Hons) MSc.

Chief Superintendent

National Secretary, Police Superintendents' Association

Contents

- 1. Introduction
- 2. Remit Letter 29th November 2022
- 3. Procedural Justice
- 4. PSA's requests to the 2023/24 Remit Letter
- 5. PSA-Specific Evidence and Requests to the PRRB
- 6. SANI- Specific Evidence and Requests to the PRRB
- 7. PSA & SANI Evidence for a September 23 Pay Award
- 8. Summary of Results from the PSA December 2022 Pay Survey
- 9. Appendices

1. Introduction

- 1.1 This is a joint submission to the Police Remuneration Review Body (PRRB) by the Police Superintendents' Association (PSA) and the Superintendents' Association of Northern Ireland (SANI).
- 1.2 The PSA represents approximately 1,450 superintendents and chief superintendents across 49 police forces. In addition to the 43 Home Office police forces, it also represents members in the British Transport Police (BTP), the Civil Nuclear Constabulary (CNC) and the crown dependency of the Isle of Man and British overseas territory of Bermuda and Gibraltar, namely the Royal Gibraltar Police and the Royal Gibraltar Defence Police. SANI represents 76 members in the Police Service of Northern Ireland.
- 1.3 The PSA was previously called the Police Superintendents' Association of England and Wales (PSAEW). The association shortened its name with effect from 22nd January 2018, to better reflect the scope of its membership and responsibilities mentioned above. All references to PSAEW within this submission, from previous pay rounds or correspondence, can be assumed to also refer to the now PSA.
- 1.4 Collectively, our members are the senior operational leaders in policing and together with chief officers, account for the most senior 1% of police officers by rank within the service.
- 1.5 The PSA submission should be read in conjunction with the joint statement on police officer pay made with the National Police Chiefs' Council (NPCC). For brevity and to achieve consensus ahead of the considerations by the PRRB, this year the PSA has worked with the NPCC and other stakeholders and has compiled a submission that we all agree. Please see appendix 1 for a copy of the joint statement on police officer pay.
- 1.6 This document builds on previous submissions and evidence from previous years remains valid. We would ask that members of the PRRB refer where appropriate to previous submissions.
- 1.7 There is a specific section on SANI-related issues included at the request of the PRRB (see chapter 6).

2. Remit Letter 29th November 2022

2.1 On the 29th of November 2022 the Home Secretary, Rt Hon Suella Braverman KC MP sent the following remit letter to Zoë Billingham CBE, the PRRB Chair:

29 November 2022

Dear Zoë

POLICE REMUNERATION REVIEW BODY REMIT 2023/24

I would first like to thank the Police Remuneration Review Body (PRRB) for its work during the last pay round resulting in submission of your Eighth Report. The Government continues to value the independent and expert advice of the Review Body. I write to you now to formally commence the 2023/24 pay round.

I refer to the PRRB the following matters:

- how to apply the pay award for 2023/24 for police officers of all ranks, including chief officers
- to consider proposals resulting from the review of chief officer remuneration
- to provide further commentary and observations on benchmarking and the P-factor, and whether the points raised in the last pay round have been addressed.

I note the PRRB's views on allowances set out in last year's report. As requested, the Home Office's evidence will provide direction on how allowances should be considered as part of the overall remuneration package, while noting the wider context of pay for 2023/24.

Pay awards must strike a careful balance - recognising the vital importance of public sector workers, whilst delivering value for the taxpayer, considering private sector pay levels, not increasing the country's debt further, and being careful not to drive prices even higher in the future.

In the current economic context, it is particularly important that Pay Review Bodies have regard to the Government's inflation target when forming recommendations. In considering the appropriate level of pay for police officers I would also ask you to have regard to the standing terms of reference set out at:

https://www.gov.uk/government/organisations/police-remuneration-review-body/about/terms-of-reference.

Thank you for your hard work in this important area. I look forward to receiving your report in May 2023.

Rt Hon Suella Braverman KC MP

3. Procedural Justice

3.1 Procedural Justice is important to the police workforce. It can be defined as follows:

What Is Procedural Justice?

Procedural justice affects how decisions are made and policies are established. It is based on the premise that the most fair and respectful decision will be made. Procedural justice is also concerned about creating policies and procedures that take all perspectives and concerns into consideration. When a situation cannot be resolved between the parties, and a leader or manager is required to make a ruling, procedural justice suggests that decisions be neutral, based on fact, and appropriate for the actions.

When employees believe problems will be resolved fairly and honestly, they will have more confidence in the decision. This puts a burden on companies to create procedures and policies, which demonstrate procedural justice, meaning the response will be fair and consistent regardless of who is involved in the situation.

https://study.com/academy/lesson/procedural-justice-in-the-workplace-definition-theory-examples.html

Procedural justice is the idea of fairness in the processes used to resolve disputes, and how people's perception of fairness is impacted not only by the result of their experiences but also by the quality of their experiences. As a fundamental aspect of conflict resolution, procedural justice theory has been applied in a wide variety of settings, including <u>due process</u> in the <u>U.S. criminal justice system</u>, supervisor-employee relations, and disputes in educational settings. In the context of criminal justice, most procedural justice research has focused on interactions between citizens, the police, and the <u>court system</u>. The aspects and application of procedural justice are areas of study in social psychology, sociology, and organizational psychology.

Robert Longley

Published on April 27, 2022 https://www.thoughtco.com/what-is-procedural-justice-5225379

- 3.2 Members of the PSA do not believe the PRRB process delivers procedural justice.
- 3.3 This is evidenced by the most recent PSA/SANI pay survey conducted in December 2022. The results are as follows:

Title: PSA/SANI Pay Survey Initial Findings

To what extent do you feel that pay awards resulting from the PRRB process have been fair?								
2022			2021					
Unfair	Neither fair nor unfair	Fair	Unfair	Neither fair nor unfair	Fair			
75%	24%	1%	71%	27%	2%			

The Police Remuneration Review Body (PRRB)

To what extent are you aware of how the Police Remuneration Review Body (PRRB) works?							
2022			2021				
Not at all aware	Somewhat aware	Very aware	Not at all aware	Somewhat aware	Very aware		
23%	66%	11%	26%	67%	7%		

To what extent do you feel that the PRRB process itself is fair?								
2022			2021					
Unfair	Neither fair nor unfair	Fair	Unfair	Neither fair nor unfair	Fair			
62%	34%	4%	56%	38%	6%			

^{3.4} It is important that as a staff association, the PSA raises these issues on behalf of our workforce, as police officers cannot strike, withhold their labour or negotiate. We are at best consulted. In comparison, it is evident that industries in both the

public and private sectors, that have the ability to negotiate or withhold labour, have been seen to secure better pay awards.

The Government's inflation target is currently 2% and in the last year, when the inflation rate reached 11.05% our members received confirmation that the PRRB recommended that superintending ranks should receive a pay award of between just 2.1 and 2.7%:

Source: https://www.bbc.co.uk/news/business-62134314

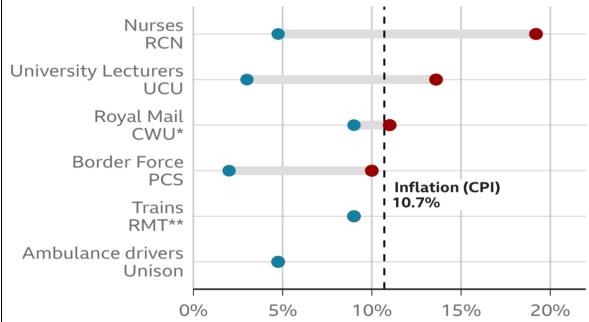
Have any disputes been resolved?

Some workers have settled disputes:

- Network Rail workers in the TSSA union voted to accept a 5% pay increase this year, with 4% next year and a guarantee of no compulsory redundancies until 2025
- Criminal barristers in England and Wales accepted a <u>15% pay rise</u> in October
- 2,000 Arriva bus drivers in London won an 11% pay deal
- Some BT workers agreed a pay deal worth up to 16%
- Health workers who are members of Unite and Unison in Scotland including some paramedics, nurses, midwives and support staff
 - accepted a 7.5% pay deal in December

Gaps between employers and unions on pay

Pay offers and demands in selected disputes



*Royal Mail has offered a pay deal which it says is worth up to 9% over 18 months. **Rail Delivery Group and Network Rail have offered 8% and 9% over two years.

Source: BBC research, 13 Dec

Who else is considering industrial action?

- About 100,000 civil servants have voted to strike across different government departments
- Junior doctors in England, represented by the British Medical Association, are <u>planning to hold a ballot</u> in January, over a pay deal which will give them 2% this year
- Firefighters are being <u>balloted on potential strike action over</u> <u>pay</u>. The Fire Brigades Union (FBU) says the current 5% pay offer is "derisory". The ballot closes on 30 January.
- 3.5 The PSA as an association, and its members as individual police officers, believe that the PRRB does not provide the police workforce with procedural justice. It is therefore the view of the PSA that the PRRB chair, members of the PRRB, the home secretary and Home Office officials should ask why the superintending ranks in policing hold this view.
- 3.6 The remaining part of this chapter will articulate concerns that lead to a conclusion that the PRRB process lacks procedural justice.

- 3.7 The PRRB has been in operation since 2014. The legislation that governs it is found within the Police Act 1996 and the relevant sections are Section 64A, 64B and Schedule 4B.
- 3.8 The Government often refers to the PRRB as independent. The PSA does not believe this description is accurate, because the prime minister appoints the chair, and the secretary of state appoints the PRRB members using the following power:

64AThe Police Remuneration Review Body

- (1) There shall be a body called the Police Remuneration Review Body.
- (2) It shall consist of—
- (a) a chair appointed by the Prime Minister, and
- (b) five or more other members appointed by the Secretary of State, one of whom the Secretary of State may appoint as deputy chair.
- 3.9 There is no requirement for staff associations to be consulted during this process and no attempt has been made. This is evidenced by the appointment of both previous chairs, both of which were simply announced by the home secretary.
- 3.10 Further, the secretary of state sets the terms of reference that the PRRB must operate within, without any consultation. See

https://www.gov.uk/government/organisations/police-remuneration-review-body/about/terms-of-reference

- (b)considerations to which it must have particular regard;
- (c)the evidence that it must obtain;
- (d)matters on which it is to make recommendations.

Paragraph 12 and 13 of Schedule 4B of the Police Act 1996 states:

- 12 The Secretary of State may give directions to the review body about the matters that it is to consider when making decisions.
- 13(1) The Secretary of State shall consult with the persons and bodies listed in sub-paragraph (2), and any others that the Secretary of State thinks fit, before—
- (a)making or revising a determination under paragraph 2;
- (b)issuing or revising a statement of principles under paragraph 4;
- (c)giving or revising a direction under paragraph 11(2) or 12.
- (2) The persons and bodies are—
- (a)the Department of Justice in Northern Ireland;
- (b)persons whom the Secretary of State considers to represent the views of chief officers of police and of the Chief Constable of the Police Service of Northern Ireland;
- (c)persons whom the Secretary of State considers to represent the interests of members of police forces;
- (d)persons whom the Secretary of State considers to represent the interests of members of the Police Service of Northern Ireland;
- (e)persons whom the Secretary of State considers to represent the views of the persons and bodies who between them maintain the police forces in England and Wales;
- (f)the Northern Ireland Policing Board.
- 3.11 Using these powers, the secretary of state issues their remit letter. There is no formal consultation process described or followed by the home secretary with regards to their issuance of the remit letter. Since 2017 the PSA (when it has formally taken part in the PRRB process), has requested that the home secretary include matters of importance to the superintending ranks as part of her remit letter, so an independent view and subsequent recommendation from the PRRB can be provided in line with 64B (5) (d) of the Police Act 1996. Essentially, the PSA has

been trying to use the mechanism designed and controlled by the Government to request that the 'independent' PRRB makes a recommendation to the home secretary in line with the PRRB's powers in section 64B (6):

(6) The Police Remuneration Review Body may include in a report under this section any recommendations it considers appropriate arising out of matters referred to it under this section (whether or not it is required to do so by a direction under subsection (5)).

3.12 The matters that the PSA has asked to be considered have been important matters for our members and the wider police workforce and have not been voluminous or vexatious. The chronology below shows the items that have been put forward by the PSA, the responses we have received from the Home Office and what was finally included in the home secretary's remit letter:

2018/2019 PAY ROUND

From: [HOME OFFICE]

Date: Tuesday, 15 August 2017 at 16:44

To: PSA et al

Subject: PRRB - next pay round 18/19

Dear All,

Although we do not yet have a confirmed timetable for the next pay round (2018/19), it is getting towards the time when we can start to think about the Home Secretary's remit letter to PRRB. The date of issue is likely to depend on the timing of the Chief Secretary of the Treasury's letter to Pay Review Body Chairs, which will be issued some months later than usual. This will set the parameters for public sector pay awards in 2018/19, to which govt. departments and employers will be expected to adhere in producing their proposals. However, I think we can certainly start to pin down the broad content in advance of that. NPCC will lead on the engagement process around the remit in terms of detailed pay proposals, but in the meantime I wanted to give you an idea of what I think is likely to be in the letter and to ask whether there are any other broad themes that may need to be considered by PRRB this year.

Key themes:

- We will be asking PRRB to consider detailed evidence from NPCC on workforce and pay reform plans. This would include proposals for an overarching structure and a timetable for decisions.
- A linked element will of course be the annual award for 18/19 and how this can support reforms. This may include any interim changes to allowances etc that may be necessary in advance of new pay structures.
- You will be aware that we have confirmed our intention to look at including chief officers in the PRRB remit this year and have replied to consultees to inform them of this
- Alongside these elements, I expect the Home Secretary to set out her expectations of PRRB in considering them, particularly on the reform programme.

I acknowledge that there may also be some conclusions in the current unpublished PRRB and SSRB reports which need wrapping up in this year's remit. I understand that you will want some time to consider these once they are published (expected by mid-September once ministers have decided on the 17/18 pay award) and that this will need to feed in to discussions with NPCC and APCC.

Also just to flag that although two late data submissions delayed work on the 16/17 Police Workforce & Pay census data by 2 weeks, I think we should still be able to send out data tables to you and to OME by the end of this month so that you can start your own analysis. Unfortunately 3 forces – Gwent, Norfolk and Suffolk – were not able to provide us with any pay data this year because of issues with payroll providers so we will be looking now at whether there is anything we can do to support those forces in advance of next year's collection to ensure that we get a full return. This will be increasingly important in monitoring the effect of reforms in the coming years and I would ask for your support in encouraging forces to comply as far as possible with this return. I look forward to receiving any initial thoughts on the remit.

Regards

Home Office

From: Dan Murphy

Sent: 15 October 2017 12:17

To: [HOME OFFICE]

Subject: Re: PRRB - next pay round 18/19

XXXX, As promised.

I would request that the following issues are included in the remit letter:

- I would like the PRRB to consider the long term evidence that shows the superintendent ranks are continually working their rest days and suggest ways of how this issue can be resolved and remunerated.
- I would like the PRRB to review the regulations that govern the superintending ranks working hours and comment on whether a 40 hour working week would promote equality and flexible working.
- I would like the PRRB to review the response by the NPPC and APPC to recommendation 3 in the 2017 PRRB report (bonus payments).
- I would like the PRRB to consider the requirement for an on-call allowance for superintending ranks.
- I would like the PRRB to consider the impact the annual allowance pension tax charges are having on the remuneration package of superintendents.

Kind regards

Dan

Chief Superintendent Dan Murphy, BA(Hons), MSc.

From: Home Office

Date: Monday, 20 November 2017 at 15:51

To: Dan Murphy

Subject: RE: PRRB - next pay round 18/19

Dan,

Many apologies for the delay in replying to this. We've now put up advice to the minister on what might be included in the remit letter and he is considering these points along with NPCC's proposals. We expect a reasonably quick decision and we think that remit letters will go out this month, depending on the timing of HMT and NO 10 clearance.

At this stage, I would say that bonus payments are likely to be covered in a general point about recruitment and retention payments and there would be very little room in the remit letter to get too much more specific on that - this is because the final proposals from NPCC will evidently need to have been discussed with other partners, including yourselves, first and the details may change before evidence is submitted.

Also it is safe to say now that we cannot ask PRRB to look specifically about any measures to make up for pensions tax issues as this is not the role of PRRB. However, PRRB do want to understand the total package and the wider context and so we do expect partners to put in some contextual evidence on this, although we do not expect PRRB to make specific recommendations directly addressing pensions or tax, or any recommendations that seek to compensate for pensions tax via pay solutions.

Home Office

On 21 Nov 2017, at 10:40, Dan Murphy wrote to the Home Office:

XXXX

Thank you for the update. To aid our understanding please can we be provided with a copy of the advice you provided to the Minister and a copy of the NPCC proposals.

Also, pension tax (as a result of Annual Allowance and Life Time Allowance breaches) is a significant issue for the superintending rank, but it appears neither the PABEW or PRRB are the places to formally discuss the impact it is having on the superintendents' renumeration package/morale. Please can you advise the correct forum for a staff association to raise this issue to seek a resolution? Many thanks

Dan

Chief Superintendent Dan Murphy, BA(Hons), MSc.

From: [Home Office]

Date: Tuesday, 21 November 2017 at 10:46

To: Dan Murphy

Subject: Re: PRRB - next pay round 18/19

Ministerial advice is never shared externally so I can't give you that I'm afraid. XXXX will be sending round a letter shortly I think and copying everyone - I

haven't had the final issues through in writing yet.

I'll ask XXXX about pensions tax but I think that would still be PAB.

Home Office

On 21 Nov 2017, at 10:59, Dan Murphy wrote to the Home Office:

XXXX

I accept you cannot provide the advice provided to the Minister. However, my note to you asked for the following items to be included in the remit letter:

- I would like the PRRB to consider the long term evidence that shows the superintendent ranks are continually working their rest days and suggest ways of how this issue can be resolved and remunerated.
- I would like the PRRB to review the regulations that govern the superintending ranks working hours and comment on whether a 40 hour working week would promote equality and flexible working.
- I would like the PRRB to review the response by the NPPC and APPC to recommendation 3 in the 2017 PRRB report (bonus payments).
- I would like the PRRB to consider the requirement for an on-call allowance for superintending ranks.
- I would like the PRRB to consider the impact the annual allowance pension tax charges are having on the remuneration package of superintendents.

Your response did not mention the items I highlight in yellow. Please can you advise if they were included in the advice to the Minister? If they were not included in the brief it would be important for us to know.

It would also be helpful to know what issues/topics the NPCC raised and if all of them were included in the brief to the Minister.

Please don't feel I am asking for the advice again, what we are seeking is a better understanding of the process.

Many thanks

Dan

Chief Superintendent Dan Murphy, BA(Hons), MSc

On 21 Nov 2017, at 13:04, the Home Office wrote to Dan Murphy (PSA):

They were included of course but there isn't such a definitive position on them so we will need to see what the minister thinks - I just fed back on the things I thought were pretty predictable in case it was helpful.

I am happy to go through the process again if that would be helpful but probably easier on the phone.

Home Office

3.13 The 17th of December 2017 remit letter contained the following:

Home Secretary

2 Marsham Street London SW1P 4DF

www.gov.uk/home-office

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.

3.14 The PRRB made the following recommendations in their Fourth report (2018)

Our 2018/19 recommendations (from 1 September 2018)

- We recommend that the time-limited 1% non-consolidated pay award received by the federated and superintending ranks in 2017/18 should be consolidated onto all pay points for officers at these ranks.
- In addition to and following our previous recommendation, we recommend a consolidated increase of 2% to all police officer pay points at all ranks.
- We recommend that London Weighting and Dog Handlers' Allowance should be uprated by 2%.
- On apprenticeship pay:

Subject to further review in the next pay round, police forces should appoint apprentice constables on a starting salary of between £18,000 and pay point 1 (currently £23,124), with the understandings that:

- a. individual forces are able to choose to use a starting salary between £18,000 and pay point 1;
- b. pay expectations of apprentices will not be undermined by later changes to the arrangements; and

c. that the NPCC will develop the apprentice pay and career progression.

We also recommend that following twelve months, and subject to satisfactory completion of Year 1 of their apprenticeship, the apprentice constable should move to the next paypoint on the existing police constable payscale, which would be paypoint 1 or 2 depending where on the pay scale the apprentice was appointed.

- 3.15 Only one partial request from the PSA made it into the remit letter.
- 3.16 PSA request: I would like the PRRB to review the response by the NPPC and APPC to recommendation 3 in the 2017 PRRB report (bonus payments).
- 3.17 Remit letter comment: to review final NPCC proposals for time-limited, targeted payments to address specific recruitment and retention pressures.
- 3.18 The PRRB did not make a recommendation.

2019/2020 PAY ROUND



19 December 2018

Dear Dan

Police Remuneration Review Body remit letter - 2019/20 pay round

Thank you for your letter dated 4 October with suggestions for items to be included in the remit letter to the Police Remuneration Review Body (PRRB) for the 2019/20 pay round.

We have very carefully considered the suggestions you made for inclusion in the remit letter. As you are aware, it is the Home Secretary's remit letter in which he sets out the priorities for the coming pay round, in consultation with the Chancellor and the Prime Minister. While there is no requirement for a formal consultation process with partners, we welcome views from the sector before finalising the letter and we

are grateful for your detailed suggestions. However, I am sure you will understand that it is not possible to include everything that everyone asks for, and we must task the PRRB to make recommendations on priority issues that require independent advice. In many cases, it may be more efficient to deal with issues outside of the formal pay review process if parties are able to work together to agree a solution.

The views of the PRRB on the design principles, framework and assumptions for pay reform in this pay round are crucial to ensure this work progresses at pace and implementation from 2020 remains achievable, and this is therefore a key element of this year's remit letter. We understand that you have concerns about the development and progress of this work, and we have asked the PRRB to provide their observations on the extent to which the views of the staff associations have been considered in the development of the design; and to provide observations on the timescales for implementation, taking into account the requirement for formal consultation with the staff associations

In regards to the specific points you suggested for inclusion in this year's remit letter, I have responded to each below.

- 1: Police Regulations 2003 and discretion of chief officers to make payments. This has not been included in the remit letter for this pay round. The provision of allowances in Police Regulations provides a flexible framework for chief constables to implement at a local level and respond to local issues. We do not believe it is appropriate to remove chief constables' discretion when determining whether to pay flexible allowances and understand that they would be concerned if such payments were mandated. However, we understand your concerns and will keep this under review.
- 2: Review of South East allowance and amounts that are paid by chief officers. The NPCC pay and reward team are considering regional allowances as part of their wider plans for pay reform. We therefore do not believe that these allowances should be singled out for specific attention at this stage.
- 3: Results of an exercise to benchmark the pay of the superintending ranks. The NPCC pay and reward team are benchmarking the pay of all ranks as part of work to develop new pay structures. The pay of the superintending ranks needs to be considered alongside all the other ranks, rather than in isolation. However, we note the concerns of the PSA on the timescales for implementation and we have asked the PRRB to provide views on the overall project plan and timescales for implementation, taking into account the requirement for formal consultation with staff associations and the need to make legislative changes.
- 4: Review of the targeted/bonus payments to the superintending ranks.

We understand that the NPCC intends to survey forces on their use of the bonus payments and provide an update to the PRRB. However, since the proposal on targeted/bonus payments was not announced until September and Determinations are unlikely to be published until late December/early January, there may be limited data available for PRRB to consider. We have therefore not singled out these

payments for specific attention, but we will of course consider any observations and conclusions the PRRB draws from the evidence that is presented to them.

- 5: Proposals for on-call payments the superintending ranks. We note that the PRRB highlighted this as an area requiring attention in their last report, and that the NPCC highlighted in their evidence last year that the allowance would be considered in spring 2018. We have therefore asked the PRRB to review their proposals for this payment. However, we have not asked the PRRB to consider an interim recommendation mirroring the award agreed for the Scottish Superintendents if fully developed proposals are not submitted by the NPCC.
- **6: HMRC mileage allowances.** As discussed at the recent PCF, if HMRC's rules are being misinterpreted by forces, we suggest that further evidence is collected and addressed via guidance. We are confident that this issue can be dealt with outside of the formal pay review process and will work with you to ensure this is addressed.
- 7: Payment for cancelled rest days. We understand that this continues to be a concern for the PSA, but payment for cancelled rest days is not supported by employers or other staff associations. We share the view held by others that this issue is related to management and welfare rather than pay and increasing pay may create perverse incentives (for example, by making it more attractive to work much longer hours and increase tolerance of cancelled rest days, with subsequent damage to health). We understand that CC Habgood has written to chiefs asking that this is dealt with locally.
- 8: Pensions and annual tax allowance. Pensions and tax issues are not in the remit of the PRRB per se, although they may make observations on this. I understand that you are collecting evidence on the impact of the annual allowance so that the Police Pensions Team can further consider this.
- 9: The role of the Police Consultative Forum (PCF). We have recently discussed your concerns about the role of the PCF, and we agree there is merit in reviewing the terms of reference and membership of the group and establishing ways for it to work more effectively. However, it is not within the remit of the PRRB to consider the role of the PCF. The Minister for Policing and the Fire Service has asked Home Office officials to carry out a review of the PCF and make recommendations on how it operates in the future. We look forward to working with you on this.

I hope that you find this response helpful, and happy to discuss in more detail if that would be useful.

Yours sincerely

Police Pay and Conditions Policy

3.19 The 19th of December 2018 remit letter contained the following:

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

The PRRB made the following recommendations in their Fifth report (2019):

- A one-year pay award for police officers in 2019/20.
- A consolidated increase of 2.5% to all police officer pay points for all ranks.
- Subject to further review in the next pay round, no change to the current arrangements for apprentice progression, namely that following twelve months, and subject to satisfactory completion of Year 1 of their apprenticeship, apprentice constables should move to the next pay point on the existing police constable pay scale.
- Dog Handlers' Allowance should be uprated by 2.5%.
- London Weighting should be uprated by 2.5%.
- An increase in the On-call Allowance from £15 to £20
- 3.20 Only one partial request from the PSA made it into the remit letter.
- 3.21 PSA request: Proposals for on-call payments for the superintending ranks.
- 3.22 Remit Letter Comment: To review proposals from the NPCC in relation to making payments to the superintendent ranks for undertaking each 24 hour on-call period.
- 3.23 The PRRB did not make a recommendation with regards to an on-call allowance for the superintending ranks.

2020/2021 PAY ROUND

20th September 2019 Head of Police Pay Police Workforce and Professionalism Unit

Dear [Home Office],

Subject: REMIT LETTER

I am writing in response to your email dated 17th September where you have asked for our comments by 24th September in relation to issues, we would consider need to be included in the next remit letter to the Chair of the PRRB.

Below I list the issues the PSA request are included in this years' remit letter. I shall comment further in turn on each issue later as part of this response.

- PRRB 2018/19 Requests & Comments
- Superintendent on-call
- Pay Discretion for Chief Constables/Bonus Payments
- Pension Challenge Remedy & Pay Reform
- Working Hours (Working Time Regulation Compliance)
- Management and Recompense for Rest Days in Lieu Superintending Ranks
- South East Allowance
- Consistency in Renumeration Between UK forces

PRRB 2018/19 Requests & Comments

On the 19th of August the PSA and Federation jointly wrote to the Home Office setting out a number of information requests and comments/directions that the PRRB included in their most recent report in a letter entitled: **Police Remuneration and Review Body Report: actions and accountabilities**. To date a response has not been received from the Home Office.

The PSA request that the remit letter includes all the issues raised in this letter under Appendix A and specifically PRRB recommendations 2 & 3 as items for the PRRB to follow up and where appropriate provide recommendations on.

Superintendent on-call

The PSA are aware that there is the following comment in the latest PRRB report:

Para 4.72 - We therefore ask that the NPCC provides us with a proposal in time for next year's pay round on the introduction of the On-call Allowance to the superintending ranks or sets out an alternative method for compensating the superintending ranks for undertaking such duties.

The PSA are also aware that the NPCC Pay Lead has submitted a proposal to the 25th September PCF meeting. The following is a section from the report:

'PCF are asked to approve a recommendation to PRRB for the introduction of a £20 on call allowance for superintendents for every 24 hours to take effect from 1st September 2019, as an interim measure pending introduction of reformed total pay package for superintending ranks.'

The PSA request that the remit letter includes a request for the PRRB to review the efficiency of the process followed to introduce the new regulation and whether the recommendation to allow payments to be back dated to the 1st September 2019 was fully honoured and effective.

Pay Discretion for Chief Constables/Bonus Payments

On the 19th November 2018 the PSA commented in our formal consultation response to the Home Office on the proposed regulations changes to introduce bonus/targeted payments as follows:

The PSA has been engaged through the Police Consultative Forum (PCF) by the NPCC/APCC as the proposals have been developed. The PCF has jointly agreed for the proposal to be sent to the Minister, so they can be included in Annex U by way of determination. However, as the PSA does not have any negotiating rights in relation to the creation or the alteration of regulations, we have only therefore been able to raise our concerns and hope they are listened to and subsequently lead to the necessary/appropriate amendments. During the engagement process we have raised the following points with the employer, which are still to be resolved:

• The use of and level of decision-making discretion that Chief Constables have been granted by the proposal

The PSA believe the degree of discretion provided to Chief Constables is disproportionate and will create unfairness and inequality as there is no maturity within police pay mechanisms to apply these payments fairly. The employer has not responded to our concerns and has written the draft proposal, so they have complete discretion to decide on whether they have a policy, as to who gets any payment and how much they receive.

The PSA's 2018 evidence submissions to the PRRB also commented on our concerns in relation to the introduction of wider discretions within police regulation for pay related issues.

In January 2019 the new regulation to allow targeted/bonus payments was introduced.

The use of these payments by Chief Constables to reward the additional contribution made by the superintending ranks has been negligible.

The PRRB commented as follows in their 2019 report:

Para 4.85 - In our 2018 Report, we recommended the introduction of appropriate, targeted arrangements to allow local flexibility for chief officers to make additional payments to police officers in hard-to- fill roles and in the superintending ranks using the current bonus payment framework. We also recommended that this measure be time-limited to September 2020 as pay reforms emerged. Last year, we expected to receive an NPCC proposal on the implementation of such payments but none

materialised. However, since then, progress was made and the Government approved the introduction of such payments, and the NPCC evidence to us this year estimated the extent to which forces would make use of this discretionary provision. It is too early to judge the effectiveness of these payments, although we note that there appears to have been little appetite for their use, with only 14 forces likely to use them for the federated ranks and 3 for the superintending ranks. We ask that the parties update us next year on the use of these payments.

There has been no significant uplift in their usage since the PRRB made their comments. However, the NPCC as part of pay reform are still intent on including further discretion for Chief Constables in relation to pay decisions.

Last year the PSA requested this issue be included in the 2018 remit letter so that the PRRB could examine the issue. This request was denied, and we subsequently received the following response from the Home Office on the 19th December 2018.

1: Police Regulations 2003 and discretion of chief officers to make payments. This has not been included in the remit letter for this pay round. The provision of allowances in Police Regulations provides a flexible framework for chief constables to implement at a local level and respond to local issues. We do not believe it is appropriate to remove chief constables' discretion when determining whether to pay flexible allowances and understand that they would be concerned if such payments were mandated. However, we understand your concerns and will keep this under review.

The PSA request that the remit letter includes a request that the PRRB investigate fully whether providing Chief Constable with 'discretion' for pay decisions is either a workable and fair remuneration lever or simply a method used to suppress pay.

Pension Challenge Remedy & Pay Reform

The service/public sector is currently waiting to understand how the outcome of the McCloud & Sergeant case will be remedied through the Courts and across the affected public sector organisations. The outcome of the case will lead to a significant administrative burden on Pension Administrators and Forces. Unless the remedy applied is simple and straight forward there is likely to be wide spread confusion amongst the police service in relation to how much their pensions will be worth and how and when they can claim them.

This significant change in pensions is currently on roughly the same timeline as the pay reform implementation. As pensions are linked and set by pay levels the introduction of both changes in the pay and pensions arena at approximately the same time is likely to multiply the confusion and anxiety amongst officers. It could also significantly affect the value of some officers' pensions.

The PSA request that the remit letter includes a request to explore the impact of both changes being introduced at the same time and to make recommendation to reduce the impact of the changes.

Working Hours (Working Time Regulation Compliance)

The superintending ranks fall within the remit of the working time regulations.

The Terms of Reference of the PRRB include:

The Police Remuneration Review Body² (PRRB) provides independent recommendations to the Home Secretary and to the Northern Ireland Minister of Justice on the hours of duty, leave, pay, allowances and the issue, use and return of police clothing, personal equipment and accoutrements for police officers of or below the rank of chief superintendent and police cadets in England and Wales, and Northern Ireland respectively.

For the last two years the PSA have commented in our written and verbal evidence to the PRRB about the excessive working hours of the superintending ranks.

In 2018 the PSA commissioned a comprehensive report into the working time of police superintendents, entitled Project Cadmium, which reviewed the working time of police superintendents. A summary of the findings of the study revealed:

- At the commencement of the project there were 1267 PSA members of which 326 fully participated and provided a full data set.
- This equates to 26% of the membership.
- From the 326 participants, 115 were found to have breached Regulation 4 WTR (exceeded 48hrs) which equates to 35%.
- All the 115 participants also breached Regulation 10 (less than 11hrs rest) on at least one occasion.
- The highest recorded working time total was an individual working on average 70 hours and 31 minutes over the reference period.
- The highest number of occasions when Reg 10 WTR was breached by an individual was 65.

The PSA have shared the methodology and findings with to two Queens Counsels who have provided their joint legal opinion. An edited summary of their conclusion is outlined below.

It is quite clear that the PSA have now assembled compelling evidence of breaches of regulation 4 (maximum working week of 48 hours); regulation 9 (duty to maintain adequate records); regulation 10 (11 hours consecutive rest in 24); regulation 12 (rest breaks of 20 minutes after 6 hours work). These breaches are longstanding (particularly that of Regulation 9) and are increasing year by year. They appear indefensible. We have outlined above the legal means by which these breaches may be enforced and we recommend that they be pursued if the Home Secretary and the Police Authorities do not concede the arguments and put in hand sufficient action to remedy the breaches.

These are not, it appears, the only breaches of WTR. The evidence we have seen suggests that some Superintendents are in practice unable to take their full entitlement of annual leave. This too may amount to a breach of the standards in Article 7 of the Directive (and hence regulation 13 WTR), because the CJEU has emphasised that workers must be encouraged to take

leave, formally if necessary, with the burden on the employer to show it exercised due diligence to enable the worker to take leave. But the breaches of regulations 4, 9, 10, and 12 appear to be systemic, widespread and serious.

The PSA request that the remit letter includes a request that the PRRB explore the PSA's evidence of breaches of the working time regulations and makes recommendations to define within police regulations 'agile' working and what actions Chief Constables need to take to ensure they are operating within the law.

Management and Recompense for Rest Days in Lieu – Superintending Ranks

When Superintendents are required at short notice to work on their rest day there is no remuneration available, but they may 're-roster' the rest day to a day in the future. However, a cyclical pattern has emerged due to the demands on Superintendents, meaning the same situation re-occurs and they never get to take these re-rostered rest days. A collection of 'banked' rest days is built-up or rest-days are continually re-rostered into the future. Eventually, because of the regulatory position when rest days become more than 12 months old, or more than three months old for bank holidays worked, they are cancelled or lost.

This ultimately leads to officers working a rest day for no payment or compensatory rest day, in addition to having reduced time off to rest.

To try and resolve this issue, PSA and SANI have raised the topic in almost every PCF meeting, starting on 26th September 2017 when the PSA and SANI jointly submitted a paper entitled 'Proposal by the Police Superintendents' Association of England and Wales, to the PCF to change Police Regulations in relation to the rules for the reallocation of rest days/public holidays'.

In the PSA/SANI submission to the PRRB in 2018, paragraphs 63 - 75 contained comprehensive evidence to justify the payment for a cancelled rest day as a problem that needs to be resolved or remitted to the PRRB for review and recommendation.

There has been no offer from the employer or the Home Office for a resolution to this issue.

The Home Office position can be summarised by the comments in its letter of 19th December 2018 where officials responded to the issues the PSA raised to be included in the 2018 remit letter to the PRRB Chair. The response stated:

7: Payment for cancelled rest days. We understand that this continues to be a concern for the PSA, but payment for cancelled rest days is not supported by employers or other staff associations. We share the view held by others that this issue is related to management and welfare rather than pay and increasing pay may create perverse incentives (for example, by making it more attractive to work much longer hours and increase tolerance of cancelled rest days, with subsequent damage to health). We understand that CC Habgood has written to chiefs asking that this is dealt with locally.

The PSA and SANI find the manner in which our members continue to be treated as perplexing, especially as forces across England and Wales have historically or are currently making local arrangements to pay for rest days worked outside of regulations to both Federated and or Superintending ranks. Examples include Thames Valley, Humberside, City of London, Cleveland, Devon & Cornwall and Hertfordshire Constabulary.

This issue has continually been raised since 2017 and as it has not been resolved by the employer via the PCF. Therefore, the PSA's only option is to request that the remit letter includes a request that the PRRB review the PSA evidence and are asked to recommend how this unfairness should be resolved.

South East Allowance

The situation with regards the application of the South East Allowance can only be described as a less than satisfactory and is not becoming any clearer. The 2018 PRRB report at paragraph 4.39 states:

'the Home Office stated that a national review of location-based payments was underway, led by the MPS, and that the Home Office felt unable, until the review had been concluded, to provide a view on whether London Weighting should be linked to annual increases in pay'.

The PSA saw no information and was not consulted in any way on any review of location-based payments during the following PRRB cycle.

The Home Office position can be summarised by the comments in its letter of 19th December 2018 where officials responded to the issues the PSA raised to be included in the 2018 remit letter to the PRRB Chair. The response stated:

2: Review of South East allowance and amounts that are paid by chief officers. The NPCC pay and reward team are considering regional allowances as part of their wider plans for pay reform. We therefore do not believe that these allowances should be singled out for specific attention at this stage.

The 2019 PRRB report stated:

4.58 We have observed increasing differentiation in the value of the South East Allowances across the relevant forces. If these local changes are not managed with due care, there may be unintended consequences for recruitment and retention. We agree that the London and South East Allowances should be considered together in a coherent way in the planned NPCC review of allowances that will be part of the reform programme.

This is an issue that is continually pushed into the future, there is no defined date for the outcome/implementation of the review of the South East Allowance to be resolved, the PCF are not sighted on activity, so the PSA's only option is to request that the remit letter includes a request that the PRRB explore the issue and make recommendations in the next PRRB report.

Consistency in Renumeration Between UK forces

SANI, ASPS and the PSA are becoming increasingly concerned that there is a growing inconsistency in the application of pay-related regulations and terms and conditions.

Across the UK police service officers have always been paid equally to ensure there are no barriers to cross-border interoperability at times of crisis. When a crisis occurs and officers from one part of the country or from another country are required to be deployed rapidly, morale needs to be at a level where officers feel valued and there is sufficient goodwill.

The recent announcement of the increase in officer numbers (20k uplift) also needs to be considered as the differences being created between forces could easily create an internal market between UK forces.

The PSA request that the remit letter includes a request that the PRRB explore the PSA's concerns and where appropriate makes recommendations to ensure that the remuneration of officers across the UK does not create interoperability issues or an internal UK market.

Following last years' arrangements I ask that once this years' remit letter is drafted that the PSA are provided with detailed and timely feedback from the Minister setting out what issues have been included in the remit letter: if any of the issues the PSA have raised above are not included in the remit letter to the PRRB Chair, I also ask that the rationale and justification for not including them is communicated in the response, so it can be shared with the PSA membership.

Yours sincerely

Dan Murphy

Chief Superintendent Dan Murphy, BA(Hons), MSc.

From: Daniel Murphy

Date: Thursday, 2 January 2020 at 23:38

To: Home Office

Subject: FW: REMIT Letter 2019

Dear XXX

Now that the Remit Letter is published and we are all concentrating on the next PRRB submission. Please could you respond to the last paragraph of the letter I sent on the 24th September – the PSA's contribution to the remit

Letter attached

Following last years' arrangements I ask that once this years' remit letter is drafted that the PSA are provided with detailed and timely feedback from the Minister setting out what issues have been included in the remit letter: if any of the issues the PSA have raised above are not included in the remit letter to the PRRB Chair, I also ask that the rationale and justification for not including them is communicated in the response, so it can be shared with the PSA membership.

Kind regards

Dan

- 3.24 No response was ever received to the PSA letter of the 20th of September 2019 or the chase up email of 2nd January 2020.
- 3.25 The 5th of November 2019 remit letter contained the following:
 - How to apply the police officer pay award for 2020/21 to all ranks, including chief officers, and to include a review of London Weighting and Dog Handler's allowance.
 - To consider the following proposals, commenting in particular on their suitability and robustness:
 - proposals for independent benchmarking, which will have been completed for all officer grades, including Chief Officers;
 - defining and valuing the 'P-Factor', recognising those elements of the role which are unique to policing;
 - the rationale and proposals for a range of pay interventions to support operational delivery through targeting roles that are hard to fill or critical to retain; and
 - wider workforce data which is available to support the uplift of 20,000 officers.

3.26 The PRRB made the following recommendations in its Sixth report (2020):

- A consolidated increase of 2.5% to all police officer pay points at all ranks.
- The removal of the lowest point of the sergeants' pay scale.
- Dog Handlers' Allowance should increase by 2.5%.
- London Weighting should increase by 2.5%.
- The maximum rate of London Allowance should increase by £1,000 to £5,338 a year for officers appointed on or after 1 September 1994 and not receiving Replacement Allowance.

3.27 No request from the PSA made it into the remit letter.

3.28 The PRRB did not make any recommendations with regards to the requests/concerns of the superintending ranks.

2021/2022 PAY ROUND



Home Office

By email:

Dan Murphy

Dear Dan

Police Remuneration Review Body remit letter - 2021/22 pay round

17 December 2020

Thank you for your email sent earlier this year to [Home Office], with suggestions for items to be included in the Police Remuneration Review Body (PRRB) remit letter. I apologise for the time it has taken to respond to you.

The Home Secretary's remit letter sets out the priorities for the coming pay round, in consultation with the Chancellor and the Prime Minister. It is not possible to include everything that everyone asks for, and the Government must task the PRRB to make recommendations on priority issues that require independent advice. Where items are not included in the remit letter, we hope that we can continue to make progress via the Police Consultative Forum (PCF).

At PCF on 14 December we agree that we should collectively reflect on the pay review process to ensure that pay reform and other priority work is being progressed in the most efficient manner. We are also happy to discuss any concerns with you separately if that would be helpful.

In regard to the specific points you suggested for inclusion in this year's remit letter, I have responded to each below.

An examination of the effect of the use of chief officer discretion in Police Regulations: Discretion to set starting salaries and pay certain allowances provides a flexible framework for chief officers to implement at a local level and respond to local issues. Chief officers must comply with the Public Sector Equality Duty when exercising their discretion and should ensure decisions are made openly and transparently.

An examination of how the 'annual allowance' issue is affecting pay negotiations and outcomes: While the PRRB review the total remuneration package of officers, their role is not to review pensions or tax arrangements. The Review Body set out in their terms of reference that it is important to be mindful of developments in police officer pensions to ensure that there is a consistent, strategic and holistic approach to pay and conditions.

That the timetable for the PRRB submissions/round be reviewed: The timetable for the pay round is set by the Government, in consultation with the Review Body. The timing of the Spending Review announcement has unfortunately delayed the start of 2021/22 pay round. We look forward to discussing the pay review process with your further in the New Year, as agreed at the last PCF.

We are grateful to members of the PCF for considering the observations the PRRB made in their last report and determining what should be prioritised. We are keen that areas that are considered high priority continue to be progressed via the PCF and welcome the opportunity to discuss further in the New Year.

Yours sincerely

Police Workforce and Professionalism Unit - Reward and Recognition

3.29 The 16th of December 2020 remit letter contained the following, which was effectively a 'Pay Pause' and the home secretary took control of any decision making by the PRRB before any evidence had even been served:

I greatly value the work of the PRRB and can assure you the Government has only taken this decision in extraordinary circumstances. While I will not be seeking a recommendation from the PRRB for police officer pay uplifts in 2021/22, I refer the following matters to you:

- for those earning the full time equivalent of gross earnings of less than £24,000, the Government proposes to continue pay uplifts at a value of £250 or the National Living Wage increase, whichever is higher. I look to the PRRB to provide recommendations on the implementation of this uplift and the number of officers it will apply to, taking into account the guidance provided in Annex A of this letter.
- to consider and make recommendations on the National Police Chiefs' Council's (NPCC) proposals to introduce a 'pay progression standard' and the timetable for implementation.
- in your last report, you provided thoughtful observations on the proposals submitted by the NPCC on benchmarking of police officer pay and valuation of the 'P factor'. I expect the NPCC to update you on the work undertaken to reach consensus with all parties on the methodologies used to benchmark the pay of all ranks and to value the 'P-factor' and I would be grateful for your updated commentary on this important work.
- 3.30 The PRRB made the following recommendations in its seventh report (2021):

Our 2021/22 recommendation (from 1 September 2021)

- The minimum rates for Police Constable Degree Apprentice starting pay and pay point 0 of the constable scale are uplifted by £250, and that all officers with a basic salary above these minima but below £24,000 (on a full-time equivalent basis) should receive a consolidated pay award of £250.
- 3.31 No request from the PSA made it into the remit letter.
- 3.32 The PRRB did not make any recommendations with regards to the requests/concerns of the superintending ranks.

2022/2023 PAY ROUND

3.33 At the PSA conference in September 2021 the PSA president announced that the PSA would be withdrawing from the PRRB process.

14th September 2021:

Mr Griffiths will tell delegates: "No one enters policing to get rich. It is a vocation and a career that provides challenge and demands sacrifice like no other – something clearly demonstrated amidst the pandemic. However, with very few employment rights, it is essential that police officers have fair and transparent processes in place to determine their pay, and that they have a clear voice within this. The Government direction on public service pay has overridden these processes, making decisions around pay in advance of the evidence it requests from stakeholders right across the Service.

"Currently, we have no procedural justice when it comes to pay and police officers are not being heard.

"It is for this reason that I can announce today that the PSA is withdrawing from the PRRB process."

https://www.policeprofessional.com/news/superintendents-association-to-withdraw-from-pay-review-process-amid-widespread-anger-over-freeze/

3.34 The PSA and Police Federation jointly wrote to the Home Office on the 14th October 2021:

14/10/21

Deputy Head, Police Workforce & Professionalism Unit Home Office 2 Marsham Street London SW1P 4DF

Dear XXXXX

Police Remuneration Review Body - Remit Letter 2022/23

An open letter was sent to the Prime Minister and Chancellor on 27 July this year from the National Chair of the Police Federation of England and Wales setting out the strength of feeling among our members about the Government's attitude to and treatment of police officers.

The letter noted we had withdrawn from the Police Remuneration Review Body (PRRB) because the current system is not fit for purpose. We sought agreement to work with us on a new and fairer system of remuneration decision-making and for this year's zero percent pay award to be reversed.

We have not received a response to this letter. In fact, when asked about the letter recently, live on GMB, the Policing Minister referred to having to "dig it out".

At the quarterly meeting of the Police Consultative Forum (PCF) on 16 September both PFEW and the Police Superintendents' Association (PSA) set out, again, that we would not be engaging in the PRRB process because the arrangements do not provide a fair and transparent mechanism for police officers.

At that same meeting a Home Office paper was presented which sought issues to be considered for inclusion in this year's remit letter. The items covered in the paper, such as benchmarking, p factor and pay reform more broadly have already been considered by the PRRB on many previous occasions and have also been discussed over recent years at the PCF. The key to progression in these areas does not lie with yet further consideration by the PRRB.

We are concerned this paper is an attempt to provide the PRRB with a purpose, when the real barriers to progressing pay reform lie with the lack of available funding. In addition, there seems to be a failure to allow the PRRB to properly consider the issue of pay uplifts because, under the current system, ultimate control over the content of the remit letter sits squarely with the Home Secretary.

We are seeking a fair process for the consideration of police pay and this paper gives us no assurances that will happen. It unfortunately highlights further that the current process is to be found wanting. We feel we must reiterate, again, our very real concerns that what is needed for police officers across the country is for last year's zero percent pay award to be reversed and a fair pay process to be introduced going forwards.

At the very least we seek an urgent response to these matters of great concern to our members.

Yours sincerely,

ALEX DUNCAN
National Secretary PFEW

DAN MURPHY National Secretary PSA



www.homeoffice.gov.uk

Alex Duncan National Secretary PFEW Via email

Dan Murphy National Secretary PSA Via email

22 December 2021

Dear Alex and Dan,

Thank you for your letter of 14 October regarding the role of the PRRB. You will be aware that the Home Secretary has a statutory duty to refer matters of police pay and conditions to the relevant pay review body and consider its views. The only

exception is in the event that the urgency of the measure, or nature of the proposal, means there is not enough time or it is unnecessary to do so. I do not believe either of those exceptions apply in the case of pay reform.

In its last report the PRRB requested further clarity around the methodology for both benchmarking and valuing the P-factor; and the interaction of benchmarking and the P-factor. Thank you for your work with the NRT in developing both benchmarking and P-factor, we recognise that significant progress has been made in agreeing a standard approach between staff associations and employers on these issues. We support the PRRB's view that it is important to finalise this process with a clear and transparent statement of the methodology adopted including example calculations, so that it can be used as an authoritative source document. These matters must be illustrated and described in a way that is accessible to all police officers. The work that I understand has been undertaken between the NPCC and staff associations to agree the methodologies and valuations must now be written up in the manner described above and presented to the PRRB for further consideration and endorsement.

You are aware that the Chancellor announced that the public sector pay pause will be lifted going into the next pay round. This is clearly a welcome announcement. The Home Secretary's remit letter for the 2022/23 pay round has now been issued and reflects both the new pay policy and the points raised in the paper at PCF.

Yours sincerely,

Deputy Head Police Workforce and Professionalism Unit

From: Home Office

Date: Tuesday, 11 January 2022 at 14:01

To: Daniel Murphy

Subject: Police pay round 2022

Dear Dan,

At the Autumn Budget and Spending Review on 27 October, the Government set out the expectation that public sector workers would see pay rises over the next three years as the recovery in the economy and labour market allows a return to a normal pay setting process. As the government seeks recommendations from the relevant Pay Review Bodies, there will be a focus on ensuring fairness and the sustainability of the public finances; public sector pay growth over the next three years should retain broad parity with the private sector and continue to be affordable.

As you know, the remit for the Police Remuneration Review Body has subsequently been set for the 2022/23 pay round and evidence is due to be submitted by interested parties in the coming weeks. I recognise that the Police Superintendents' Association does not intend to submit formal evidence or take part in the process. While it is a matter for each party whether and how to engage in the pay review process, it is very important to Ministers that views of police officers and their representative bodies are understood and considered by the PRRB.

In the context of the Government's clear commitment to a fair and sustainable pay review body process, I would invite you to reconsider your position and submit evidence to the PRRB that best represents your members' interests. If you do not feel in a position to do so, however, I would like to extend an invitation to you to share with us informally any key points or data that you feel it would important for the PRRB to consider. Our evidence must reflect the Government's position and is subject to agreement by the relevant departments, so I cannot give a guarantee that your points will be included in the evidence that the Home Office submits to the PRRB. However, I would reinforce that Ministers consider it vital that officers' interest are represented and in submitting our evidence to the PRRB we would endeavour to take into consideration as far as possible the key points and data that you feel would be important.

If you do wish to share key points with us, I would ask that you do so by Tuesday 18 January, to allow time for them to be considered in the preparation of the Home Office evidence. I appreciate that this is a relatively short deadline, so please do feel free to call or email me if you would like to share information but this deadline may prove difficult to meet.

I am copying this to XXXX, as well as XXXXXX and XXXX in my team.

Yours sincerely,

From: Daniel Murphy

Date: Monday, 17 January 2022 at 10:36

To: Home Office

Subject: Re: Police pay round 2022

Dear XXXXX,

Thank you for taking the time to reach out over what is such an important issue to the police workforce.

As you know, we announced our withdrawal from the PRRB process at our conference last September and in the same month met with the Home Secretary and discussed our concerns over the PRRB process in detail.

Our National Executive Committee decided on behalf of our membership that it had become necessary to withdraw from the process, having received a mandate from members at conference. It is not intended to create difficulties as our National Executive Committee would very much like to have a voice and be heard with regards to matters considered by the PRRB. The PSA is continuing to engage our membership, collecting data and views on the various issues and we have continued to engage constructively over pay related consultations and via the PCF meeting. However, as we indicated in our meeting with the Home Secretary, at which you were present, our work force is dissatisfied, disillusioned, and disagree with the way the government has tightly controlled the PRRB process and has essentially lost

confidence in it. This is understandable given the PRRB Chair stated the following in her 2021 report:

'We fully recognise the extraordinary pressures placed on the economy and on public sector finances by the COVID-19 pandemic that have restricted our remit this year. However, it is disappointing that this has <u>again</u> affected the <u>independence</u> of the Review Body process, and our view is that we should be permitted to fully exercise our role in making recommendations on pay uplifts for the next pay round.'

The offer you have provided to some form of 'informal' provision of evidence via the Home Office to the PRRB is appreciated, but will not be something that we will be following up on for a number of reasons, which include:

- The offer is conditional and still provides a filter before issues do or don't reach our independent review body
- The fact that there is a need to offer an informal system evidences and acknowledges the fact that the formal system is not working

What is more concerning is that you mention:

'it is very important to Ministers that views of police officers and their representative bodies are understood and considered by the PRRB'

'I would reinforce that Ministers consider it vital that officers' interest are represented'

However, even though Ministers may hold these strong views that the staff association input into the process is 'vital', there has been no contact with the staff associations by Ministers to attempt to restore our confidence in the process. Can I suggest that if the Ministers really do have these genuine concerns that they take the time to contact us and arrange a formal meeting to discuss the concerns of the workforce that we represent. That would allow the Minister to then feed any issues we raise into the PRRB Chair.

Kind regards

Dan

Chief Superintendent Dan Murphy, BA(Hons), MSc.

3.35 On the 2nd of December 2021, the remit letter contained the following:

- How to apply the pay award for 2022/23 for police officers of all ranks, including chief officers.
- To provide commentary and observations on the National Police Chiefs' Council's reference document that will provide a detailed explanation of: the methodologies used to benchmark the pay of all ranks including chief officers; the factors used to determine the P-factor and the methodology used to value

- it; the interaction of benchmarking and the P-factor; its overall purpose; and example calculations, addressing the points raised in your last report.
- To provide updated views on force readiness to implement the pay progression standard.

3.36 The PRRB made the following recommendations in its eighth report (2022):

- A one-year award for police officers in 2022/23.
- A consolidated increase of £1,900 to all police officer pay points for all ranks.
- The Police Constable Degree Apprentice (PCDA) minimum should be raised to pay point 0 (£23,556 from 1 September 2022).
- London Weighting and the Dog Handlers' Allowance should be uplifted by 5%.
- Parties should review the requirement and appropriate level for the Dog Handlers' Allowance.

3.37 The PSA had withdrawn from the PRRB process, sharing concerns around its unfairness, and did not submit any specific requests to be included in the home secretary's remit letter.

3.38 The PRRB did not make any recommendations with regards to the requests/concerns of the superintending ranks.

2022/2023 PAY ROUND



Home Office

By email: Dan Murphy 5 December 2022

Dear Dan

www.gov.uk/home-office

Home Secretary's remit letter to the Police Remuneration Review Body

Thank you for your email dated 13 September with suggestions of issues to be included in the Home Secretary's remit letter to the Police Remuneration Review Body (PRRB) for the 2023/24 pay round.

While there is no statutory requirement for a formal consultation process with partners, we welcome views from the sector before finalising the letter and we are grateful for your suggestions, which have been considered. As requested, I have responded to each of the specific points you suggested for inclusion in this year's remit letter below:

That the PRRB is asked to consider proposals to increase the top pay point for chief superintendents by £5,675 and either agrees or disagrees the proposal by way of a formal recommendation.

The PRRB was asked to consider this proposal by the PSA in the 2021/22 pay round; and by the NPCC in the 2022/23 pay round.

The Review Body on both occasions raised concern about requests to look at measures in isolation and has not supported the proposal. In the last pay round, it noted the NPCC's evidence did not directly address the implications of reducing the gap between top pay point for chief superintendents and the bottom pay point for assistant chief constables.

The PRRB invited the steering group overseeing the work on chief officer remuneration to consider an uplift to pay point 3 of the chief superintendents pay scale alongside its proposals for chief officer pay.

It is unlikely that the PRRB will change its position unless its previous comments are addressed and therefore, it is not included in the remit letter. We encourage the NPCC and PSA to address the PRRB's concerns in their evidence.

That 1) the £20 on call-allowance is reviewed to establish an appropriate uplift; and that it is considered as pensionable pay in line with the policy in Police Scotland; and 2) mileage allowances and essential user allowance for using a personal vehicle for work purposes are reviewed to establish an appropriate uplift.

The remit letter sets out that the Home Office's evidence will provide direction on how allowances should be considered as part of the overall remuneration package.

If Temporary Variable Payments are not made permanent or extended before the next PRRB report is produced, a recommendation should be made for how the current funds paid to the superintending ranks be redistributed as part of the 2023/24 pay award.

This is not included in the remit letter. TVPs were introduced for an initial period of two- years. The Home Office has set a clear expectation that data on the equality impact of TVPs must be collected during that period to inform advice to Ministers on whether they are introduced as a permanent discretionary allowance. We have stressed the need for robust, good quality data to be provided to inform equality impact assessments. We are grateful for the PSA's offer to share the data it has collected.

We have also set out our expectation to the NRT that a method for defining which roles are deemed to be service critical or demanding using a form of job or role evaluation should be developed, to ensure consistency in approach both within and across forces and ensure that payments are made in a way that is open and transparent. We look forward to receiving proposals on this important work for discussion with members of the PCF.

I hope that you find this response helpful.

Yours sincerely

Police Pay and Conditions Policy

3.39 The 29th of November 2022 remit letter contained the following:

I refer to the PRRB the following matters:

- how to apply the pay award for 2023/24 for police officers of all ranks, including chief officers
- to consider proposals resulting from the review of chief officer remuneration
- to provide further commentary and observations on benchmarking and the P-factor, and whether the points raised in the last pay round have been addressed.

I note the PRRB's views on allowances set out in last year's report. As requested, the Home Office's evidence will provide direction on how allowances should be considered as part of the overall remuneration package, while noting the wider context of pay for 2023/24.

3.40 No request from the PSA made it into the remit letter.

3.41 In January 2022 the PSA learnt through social media that Zoë Billingham had been appointed as the chair of the PRRB. Soon after her appointment, Ms Billingham contacted the PSA as she wanted to discuss the association's return to the PRRB process.

3.42 We accepted the invitation to engage and had a number of meetings, where we explained our concerns with regards to the lack of procedural justice demonstrated by the PRRB process. This led to the following exchange of letters:

11th February 2022

FAO: PRRB Chair Zoe Billingham

Dear Zoe.

Congratulations once more on your appointment as Chair of the Police Remuneration Review Body. We are much encouraged by your early engagement with issues that are of concern to the Police Superintendents' Association (PSA), such as the process surrounding PRRB recommendations.

As you know, the Police Superintendents' Association will not be providing written evidence to the PRRB this year, largely because the PRRB sticks so closely to the parameters of the Home Secretary's remit letter. Section 64B (6) of the Police Act 1996 is clear that the PRRB may include in a report...any recommendations it considers appropriate arising out of matters referred to it... Hence the PRRB is free to make recommendations on matters that may not be mentioned but are related to the issues in the remit letter.

Please could you confirm that this is your understanding of the position, and that you are willing to take into account evidence that relates to the wider picture so long as it is of relevance to the issues raised. Your position on how you would manage a request (with plenty of notice to all parties) for a recommendation from the PRRB on a matter of concern by a stakeholder would assist us to understand how the PRRB process will be managed as we move forward.

When we can see that the process is fair we would be very pleased to provide you with evidence, if it were to inform the recommendations you make to the Home Secretary.

We look forward to hearing from you.

Kind regards

Dan Murphy

Chief Superintendent Dan Murphy, BA(Hons), MSc.



Office of Manpower Economics

WINDSOR HOUSE 50 VICTORIA STREET LONDON SW1H 0TL

Mobile 07827 906387

E-mail abbie.lloyd2 @beis.gov.uk Website www.gov.uk/ome

The President and the National Secretary Police Superintendents' Association 67a Reading Road Pangbourne Berkshire RG8 7JD

15 February 2022

Dear Paul and Dan

Thank you for taking the time for an introductory meeting with me as I take up my appointment as the new Chair of the PRRB, and for your letter of 11 February 2022. It was valuable to receive your perspectives on the Review Body process and the background to the current position of the Police Superintendents' Association on this year's pay round.

I want to confirm to you, as I did in our introductory discussions, that I am absolutely committed to the independence of the Review Body, in particular recognising the importance of our role in recommending the setting of pay for police officers, who

give so much public service on behalf of the population. The Review Body's role is to take evidence from all parties and consider this carefully, neutrally and in detail before making a recommendation, as befits such an important issue, and this will be my guiding principle as I take up my position as Chair.

In our discussions, we covered the formal remit letter that the Review Body receives from the Home Secretary, and the fact that this does not always extend to the full scope of issues that you believe it is appropriate for the Review Body to consider in any one year. In your letter of 11 February, you asked me to confirm that the PRRB would be willing to take into account evidence related to the wider picture, so long as it was relevant to the issues raised.

Whilst the Home Secretary's remit letter provides a primary focus for the Review Body, I can confirm it is nonetheless open to us to consider any issues that fall within the broad scope of our formal Terms of Reference. We will continue to take this approach in the current pay round, where we are already considering a wide range of issues raised with us by officers in the visits we undertook in the autumn.

You also sought my views on how the PRRB would manage a request (with plenty of notice to all parties) for a recommendation from the PRRB on a matter of concern by a stakeholder.

For issues of concern to the parties to be debated by the PRRB, parties need to have formally raised them in evidence, and put forward to us information and views that we can consider, otherwise it is not possible for the PRRB to take them into account in our deliberations. You are correct that such information would need to be received by the PRRB with plenty of notice for sharing with all parties. This also gives the PRRB secretariat an opportunity to clarify any issues or seek further information from the party putting it forward. The formal deadline for written evidence this year was 9th February, although we can sometimes accommodate a short delay.

If it is not possible for the Police Superintendents' Association to provide written evidence, the Review Body would be prepared this year to allow a representative to give a short statement of up to ten minutes as your introduction to an oral evidence session in March, following which the Review Body could then ask clarificatory questions. We would welcome this statement including the key strategic issues that we outlined in our last report as important matters for this coming round, as well as any relevant, key, matters of concern. We would request a copy of the statement 14 days in advance of the session, in a form we could share with other parties in the usual way, supporting the ongoing transparency of the pay review process.

I hope this letter has provided helpful clarification on the scope of our considerations. I remain very keen that the views of the Police Superintendents' Association and its members can be given the full consideration they deserve in the determination of the pay recommendations we make for police officers this year.

I look forward to hearing from you as to whether the Police Superintendents' Association would feel able to participate in the pay review process this year.

With best wishes

Tai Billingham

Zoë Billingham



Police Superintendents' Association Ltd

67a Reading Road

Pangbourne Berkshire RG8 7JD

Tel: 0118 984 4005

Email: enquiries@policesupers.com

Zoë Billingham Chair, Police Remuneration Review Body

17th February 2022

Dear Zoë,

Thank you for your letter dated 15th February, to which I will now respond on behalf of the PSA. However, before I do so I would like to clarify that the PSA policy position remains that we have withdrawn from the process and therefore will not be providing written evidence or verbal evidence.

Your letter of the 15th February is helpful in relation to our first question, but we are still unclear with regards to how the PRRB will operate in relation to our second question.

As we understand it, in relation to our first question, you are confirming that you can and will where *appropriate* make formal recommendations for the Home Secretary to consider as per Section 64B (6) of the Police Act 1996, if the request for a recommendation is outside of the requests in the Home Secretary's remit letter but fall within the PRRB's terms of reference. If we have misunderstood the position, we ask that you please correct our understanding.

In relation to the second question, which is more about when it is *appropriate*, I will reframe the question by way of an example to try to assist. I will base the example on the NPCC's planned recommendation this year (and last year), to the PRRB that pay point 3 of the Chief Superintendents' pay scale is uplifted by £5675, which is a recommendation the PSA have supported and continue to support, and I am sure you have heard this from our members when you undertook your force visits.

Therefore, please can I ask you to explain how the PRRB would deal with the following example/situation:

During a PRRB round the PSA raise with notice to all stakeholders (at the same or at a similar time to the Home Secretary's remit letter to the PRRB) a request to the PRRB for a recommendation in relation to the benchmarking outcomes and specifically whether the PRRB will support and recommend to the Home Secretary that the uplift to pay point 3 of the Chief Superintendent pay scale should be supported.

All PRRB stakeholders after receiving ample notice have provided the PRRB with their views and evidence on the issue/recommendation, except for the Home Office.

In this example/situation – please can you explain whether you would make a recommendation without receiving any evidence/views from the Home Office?

I am sure you are grappling with this issue, as it is not a dissimilar position to where we find ourselves at present, where the Home Secretary through her current remit letter is asking the PRRB to make recommendations, but you will not have received or heard evidence from the staff associations on the matters in her remit letter. We have already described how unfair we believe the process is, so would want to be reassured that any approach by the PRRB was fair and equitable to all stakeholders.

Resolving these concerns in a fair manner will clearly provide us with a route back into the process.

I note your comments about written evidence and your suggestion with regards to the PSA changing our position to provide a written statement and verbal evidence. I am also aware that the closing date for written evidence to the PRRB was the 9th of February, but neither the Home Office nor NPCC has yet submitted their evidence. When we have clarity on the process issues set out above and I can share this internally, I will ask the PSA's National Executive Committee to reconsider their position and revert back to you.

Lastly, even though as set out above, the PSA position is that we will not be providing written evidence, it would be wrong for me not to bring to your attention the results of the PSA 2021/22 Pay Survey, which was completed by 68% of our membership. The results can be found at the following public link: Pay Documents Police Superintendents' Association (policesupers.com)

Kind regards

Chief Superintendent Dan Murphy, BA(Hons), MSc. National Secretary

Chair, Police Remuneration Review Body



WINDSOR HOUSE
50 VICTORIA STREET LONDON SW1H 0TL

Mobile E-mail Website

The President and the National Secretary Police Superintendents' Association 67a Reading Road Pangbourne

Berkshire RG8 7JD

Dear Paul and Dan

25 February 2022

Thank you for your letter of 17 February and for sending the link to the 2021 pay survey of members of the Police Superintendents' Association.

I can confirm that section 64B(6) of the Police Act 1996 provides that the PRRB may include recommendations in our report that we consider appropriate arising out of matters referred to us.

You also seek further clarification on the PRRB process for managing requests for recommendations from stakeholders other than the Home Office. Whilst it is not possible to comment on hypothetical scenarios, I can confirm that the PRRB will consider all evidence made available to us. As mentioned previously, we are already considering a wide range of issues raised with us by officers on our recent visits.

I hope this provides useful clarification.

I remain keen for the views and evidence from the Police Superintendents' Association and its members to be considered this year and look forward to hearing whether the Police Superintendents' Association can participate in oral evidence this year.

With best wishes

Zoë Billingham Chair, Police Remuneration Review Body



Police Superintendents' Association Ltd

67a Reading Road

Pangbourne Berkshire RG8 7JD

Tel: 0118 984 4005

Email: enquiries@policesupers.com

10th March 2022

Zoë Billingham Chair, Police Remuneration Review Body

Dear Zoë

Thank you for your letter of the 17th of February. I apologise for the delay in responding. We were due to meet with the Home Secretary yesterday and she had indicated that the 'PRRB' would be an agenda item, so we thought it would be prudent to wait for that meeting before we responded. Unfortunately, the Home Secretary cancelled the meeting at short notice because of the Ukrainian situation.

We note that you have been unable to comment on hypothetical situations. We felt the example we gave was one that is actually unfolding at present, so it is disappointing that you were unable to provide an answer.

We have been asking for a fair, equitable and transparent process to be put in place and we feel that if there was a clear and robust process in place, we could all have followed it and come to the same answer.

The inability to be able to provide an answer does highlight to us the continuing unfairness in the current arrangements.

The next meeting of our National Executive Committee is on the 22/23 March, where I will seek their view on your request to participate in this year's oral evidence. Once I have their view, I will write to you again.

Kind regards

Chief Superintendent Dan Murphy, BA(Hons), MSc.

National Secretary

3.43 Following a recent meeting with the police minister, the PSA received the following letter which comments on the remit process (see highlighted paragraph).

12 January 2023

Dear Superintendent Paul Fotheringham,

Thank you for your letter of 9 December. I hope that you enjoyed Christmas and the New Year and that all of your members had the opportunity to spend some time to rest and celebrate with loved ones during the holiday period.

I am pleased to hear that you have been engaging with the Operational Productivity Review, and that you have been in contact with Sir Stephen directly about PSA representation on the Stakeholder Consultation Group. It may additionally be useful to get in touch with Chief Constable Chris Rowley on the matter of Home Office Counting Rules, as he is leading this work on behalf of Sir Stephen.

The recent PEEL inspection report into Humberside showed the results of hard work and focus on improvement. Thank you for your suggestion that I visit the force. I know that the Home Secretary has received an invitation and our private offices are looking at how a visit could fit with other diary commitments.

I am pleased to say that the Private Member's Bill in respect of rural crime (Equipment Theft (Prevention) Bill), received an unopposed Second Reading in the House of Commons on 2 December 2022. It has the Government's full support and I hope it will be on the statute book as soon as possible.

On the matter of pay, I was pleased to hear that the PSA will formally engage with the pay review process this year and is committed to providing evidence to the Police Remuneration Review Body (PRRB). It is important that they hear the views and gather evidence from a full range of parties including the staff associations. I am pleased that your members' views will be fully represented.

Specifically on the question of the Home Secretary's remit letter for this round, I would respectfully disagree with your assertion that your suggestions were "ignored". While there is no statutory requirement for partners to be consulted on the remit, we have consistently welcomed views from the sector before finalising the remit letter to the PRRB each year. I would like to assure you that your suggestions were fully considered and I believe that officials

have written to you to provide an explanation on what was included in the remit letter, what was not, and why.

I always welcome your views on pay and conditions, recognising that there will be some issues on which we take a different view. I look forward to meeting with you on 16 January to discuss the Home Office's affordability evidence to the PRRB for the 2023/24 pay award.

Finally, I am also pleased to hear that my support on wellbeing has been useful, and I look forward to attending your NEC meeting in March.

Yours sincerely,

Rt Hon Chris Philp MP

3.44 Unfortunately, and disappointingly, this engagement with the PRRB chair did not provide reassurance that the PRRB process would provide the police workforce with procedural justice.

3.45 The 'snap shot' of evidence I have provided above, clearly shows that since the inception of the PRRB process, the PSA and the police workforce have been marginalised and treated as mere spectators in the 'independent' process that decides on their pay and conditions. This should not be acceptable in a modern democracy, however Home Office officials, ministers and PRRB chairs have allowed for it to continue, even though the PSA and other staff associations have continually been raising valid concerns.

3.46 Moving forward, for the PRRB to have any legitimacy it must deliver procedural justice for the police workforce.

4. PSA's requests to the 2023/24 Remit Letter

4.1 With a new PRRB chair, the PSA has once again agreed to provide evidence as part of the 2023/2024 PRRB process. It must again be emphasised that police officers cannot strike, withhold labour, or negotiate, so even though we strongly believe the PRRB process lacks procedural justice, it is the sole mechanism that makes decisions about police pay, and therefore the only formal means by which we can submit evidence on behalf of the police workforce.

4.2 On the 13^{th of} September 2022 the PSA wrote to the Home Office as follows:

From: Daniel Murphy

Date: Tuesday, 13 September 2022 at 12:53

To: Home Office

Subject: Remit Letter 2022/23 PSA Requests

Dear XXXX.

At the 'PRRB Outcome Meeting' held on the 7th September the Chair asked the PCF stakeholders to write to you with details of the items we consider to be appropriate to include as part of this year's remit letter for the PRRB Chair to be asked to make a recommendation against.

There are numerous unresolved and urgent matters that the PSA would wish the PRRB to consider. However, we have prioritised our requests to the following items and request that they are included as part of the remit letter, with a request for the PRRB to make a recommendation on each of the matters as detailed below:

- The NPCC have for two successive years recommended that the top rate Chief Superintendent pay point be uplifted by £5675. This proposal has been agreed by all stakeholders on the independently chaired Police Consultative Forum as an appropriate and timely pay reform measure. The PSA request that the PRRB considers this proposal and either agrees or disagrees the proposal by way of a formal recommendation.
- The PSA request that the £20 on call allowance that is paid for undertaking voluntary on-call arrangements is reviewed to establish an appropriate uplift. The PSA also ask that in line with our Scottish colleagues that this allowance considered as pensionable pay.
- The PSA request that the mileage allowances and essential user allowance for using a personal vehicle for work purposes are reviewed to establish an appropriate uplift.
- If the regulation that allows 'Temporary Variable Payments' is not made permanent/extended before the next PRRB report is produced, the PSA requests that a recommendation is made for how the current funds paid to the superintending ranks be redistributed as part of this year's pay award.

As the PRRB is the only route for us to have these issues formally considered by an independent review body if they are not included (as described above), the PSA asks that we receive a timely substantive response setting out the justification for why they are not being included in the remit letter

Kind regards

Dan

Chief Superintendent Dan Murphy, BA(Hons), MSc.

4.3 Subsequently, on The 29th of November 2022 the remit letter was published and contained the following:

I refer to the PRRB the following matters:

- how to apply the pay award for 2023/24 for police officers of all ranks, including chief officers
- to consider proposals resulting from the review of chief officer remuneration
- to provide further commentary and observations on benchmarking and the P-factor, and whether the points raised in the last pay round have been addressed.

I note the PRRB's views on allowances set out in last year's report. As requested, the Home Office's evidence will provide direction on how allowances should be considered as part of the overall remuneration package, while noting the wider context of pay for 2023/24.

4.4 The Home Office and minister have acted with consistency and not included any of the issues raised by the PSA on the remit letter to the PRRB chair for the 2023/2024 pay round. Yet again, this clearly evidences the procedural unfairness of the process.

5. PSA Specific Evidence and Requests to the PRRB

- 5.1 The PSA requests that the PRRB makes formal recommendations to the home secretary on the following matters of importance to the superintending ranks, as part of its ninth report:
 - The NPCC has for two successive years recommended that the top chief superintendent pay point be uplifted by £5675. This proposal has been agreed by all stakeholders on the independently chaired Police Consultative Forum as an appropriate and timely pay reform measure. The PSA requests that the PRRB considers this proposal and either agrees or disagrees the proposal by way of a formal recommendation.
 - The PSA requests that the £20 on call allowance that is paid for undertaking voluntary on-call arrangements is reviewed to establish an appropriate uplift. The PSA also asks that in line with our Scottish colleagues, this allowance is considered as pensionable pay.
 - The PSA requests that mileage allowances and essential user allowance for using a personal vehicle for work purposes are reviewed to establish an appropriate uplift.
 - If the regulation that allows 'Temporary Variable Payments' is not made permanent/extended before the next PRRB report is produced, the PSA requests that a recommendation is made for how the current funds paid to the superintending ranks be redistributed as part of this year's pay award.
- 5.2 Even though the above matters have not been included in the home secretary's formal remit letter for this year's pay round, it is accepted by the PRRB chair that it is legally possible for the PRRB to use the following power to make formal recommendations to the home secretary on all the above matters:

Police Act 1996 Section 64B (6):

- (6) The Police Remuneration Review Body may include in a report under this section any recommendations it considers appropriate arising out of matters referred to it under this section (whether or not it is required to do so by a direction under subsection (5)).
- 5.3 The remainder of this section will be used to provide evidence to support the above requests:
 - 1. Uplift of the chief superintendent pay point 3
- 5.4 With regards to the above request as part of the eighth report (2022) from the PRRB, it states:

Chief Superintendent pay scale

- 5.38 The **Home Office** stated that it expected to see proposals for changes to the pay structure presented as a coherent package for all ranks, fully costed and supported by a robust evidence base. It recognised that there may be benefits to delivering changes as an incremental approach, but it was important that a consistent approach was taken across all ranks and that the effects of any measures applied to specific pay points were fully considered.
- 5.39 The **NPCC** reminded us that last year it had endorsed the recommendation of a working party, consisting of the NPCC, PSA, APCC and PFEW, that pay point 3 of the chief superintendent scale should in principle be increased by £5,675. The NPCC said that the size of the role had increased significantly following the Winsor Review, due to an increase in the spans of control and a reduction in the number of chief superintendents by 34% since 2010. The NPCC explained that the working party had noted concerns that the level of problem solving for some chief superintendents was now comparable to that of assistant chief constables. In oral evidence, the NPCC noted that more superintendents now received TVP because of the size of their job.
- 5.40 The NPCC reiterated that the working party proposal, which would bring chief superintendents in line with the public sector benchmarking of assistant chief constables, had been informed by a Korn Ferry report. That report had identified that chief superintendents remained the most disadvantaged of all ranks against Korn Ferry data: the top of the scale was 97% of the public sector median and total remuneration at top of scale was only slightly above the public sector median. The NPCC proposed that the additional £5,675 would be added to pay point 3 as a fixed sum after applying the agreed annual increase for 2022/23.
- 5.41 The NPCC explained that the additional costs would be met by forces. The benefits, outlined by the NPCC included: the recognition of the recent changes to the role of chief superintendent and the skills required; encouraging career progression; and improved retention and morale.
- 5.42 The **APCC** said in oral evidence that it supported the proposal to uplift pay point 3 of the chief superintendents' scale. It explained that the work undertaken by Korn Ferry had demonstrated that the additional workload carried out by chief superintendents justified the uplift. The reduction in the numbers of chief superintendents meant that many of them had assumed some of the responsibilities of chief officers. The APCC told us that it did not expect the proposed increase to pay point three to create any upward pressure on chief officer pay. It also reported that the police service was not experiencing difficulties recruiting chief superintendents.
- 5.43 The **MPS** said it supported the NPCC's proposed change to pay point 3 on the chief superintendents' pay scale. The MPS noted that the proposed change was the highest priority for the PSA.

- 5.44 We first considered proposals for changes to superintendent pay in 2019 when the PSA advocated an additional 'contributory pay point' at the top of each pay scale for superintendents and chief superintendents and the NPCC told us that superintending pay was a priority for pay reform. We noted the PSA's case for additional pay, particularly in view of the overall reduction in the number of officers in the superintending ranks and the increased levels of risk associated with the acquisition of greater responsibilities and accountabilities. We asked to see a rationale for the amounts proposed for each new pay point and we suggested that the NPCC work with the PSA to develop a joint proposal.
- 5.45 Last year, when we received an update on the outcome of the joint NPCC, PSA, CPOSA, APCC and PFEW working party which had agreed that pay point 3 of the chief superintendents' scale should be uplifted, we expressed our concern about requests to consider pay reform measures relating to individual ranks in isolation. We advised that to limit any unintended consequences, we would like to see a more coherent co-ordinated approach to support reviewing the proposal in conjunction with other areas of pay. In addition, the NPCC told us it was deferring implementation of the proposal until the end of the pay pause in the public sector.
- 5.46 We note that in its evidence this year, the NPCC has provided additional information explaining how, in general terms, it considers the implications of proposals like this one in relation to other ranks. However, the evidence did not directly address the implications of the reduction of the gap between chief superintendent pay and the assistant chief constable pay scale. We were told that the uplift to pay point 3 was likely to encourage more officers to reach the rank of chief superintendent and therefore throughput to assistant chief constable thus improving retention. However, we have seen no evidence to support that assertion. Moreover, the APCC confirmed to us that the police service was not experiencing difficulties recruiting chief superintendents, so we have no evidence that the current level of pay is having a negative effect on the recruitment or retention of chief superintendents. In addition, our perception is that the police service has not considered increasing the numbers of chief superintendents as an alternative to increasing pay levels.
- 5.47 We remain concerned both about considering this proposal in isolation and how such a change could affect the morale and motivation of lower ranks at a time when there has been a significant increase in the cost of living. We note, for instance, that pay anomalies relating to the rank of chief inspector have yet to be addressed. Targeted interventions of this kind, particularly for senior ranks, have to be seen to have been considered by an open and transparent process. Moreover, we have not been able to discuss the proposal with the PSA this year, but we hope to do so in 2023/24.
- 5.48 We will want to consider the proposal on chief superintendent pay alongside the future pay reforms for chief officers. We invite the steering group overseeing the work on chief officer remuneration to consider an uplift to pay point 3 of the chief superintendent's scale alongside its proposals for chief officer pay and give us its view. The proposals, which we discussed in Chapter 4, are due to be presented to us in 2023.

- 5.5 You will see from the PRRB entry above that the proposed uplift to pay point 3 of the chief superintendent pay scale is supported by the Metropolitan Police Service, the Association of Police and Crime Commissioners, the National Police Chiefs' Council and has also been debated accepted as part of the Police Consultative Forum. The Police Federation of England and Wales did not take part in the latest PRRB process, but I can confirm that they have no objections to this proposal.
- 5.6 The NPCC has debated and agreed to adopt the proposal for two years running as part of the Chiefs' Council Committee. With regards to affordability, they have costed the proposal at approximately £900k across all 43 Home Office forces and they have accepted that these costs can and will be absorbed through the main police budget.
- 5.7 In response to the PRRB's comments in its eighth report, the PSA has worked with the NPCC and the members of the Police Consultative Forum to fully answer the concerns raised by the PRRB. The PSA therefore fully endorses and asks that the section 3.6.2 of the NPCC evidence submission to this year's pay round is also adopted as evidence from the PSA.
- 5.8 If the comments of the PRRB are dissected to draw out any concerns that have been made, the points could be summarised as follows (please also note, in addition to the evidence being provided by the NPCC, there is commentary from the PSA alongside each concern):

PRRB CONCERN	PSA COMMENT
What is the rationale for the amount (£5675)?	The PSA instructed and funded Korn Ferry to undertake an independent evaluation. The methodology and findings have been accepted by the members of the Police Consultative Forum and previously by the PRRB. The committee that oversaw the work was independently chaired by the then Police Advisory Board Chair Elizabeth France CBE. We are aware that the current chair of the Police Advisory Board Julia Mulligan, has engaged with the PRRB Chair since the PRRB raised their concerns, and has quality assured the work/proposals and is fully satisfied that the proposals are well evidenced, timely and appropriate.
That the proposal is being considered in isolation/is not coordinated	The review of superintending ranks base pay was initiated as part of the wider NPCC Pay Reform Programme. As the throughput rank to chief officer level, the NPCC lead for pay and conditions agreed with steering group members to undertake this review in tandem and in conjunction with the review of chief officer pay. The PSA is also aware that it has been accepted by the PRRB and the Home Office that it is not possible at this time to put the proposal forward as part of a

Address concerns about reduction	wider pay reform strategy. Although though this was the request of the PRRB chair as part of the commentary in their eighth report, it has been accepted by all parties that this proposal can be considered outside of receiving a wider workforce strategy. It was recognised in 2022 that the PNAC
in the pay gap between chief superintendent and assistant chief constable/commissioner	process, which is the gateway to becoming an assistant chief constable/commissioner (ACC) needed to change as there was a significant shortage of ACCs. The NPCC, Home Office and College of Policing have all agreed that the current PNAC process will cease in 2023 and there will be a new process that is significantly different. The first new style course will be delivered in June 2023. The expected outcome from the new process is that the service is likely to see excess officers qualified for the ACC rank. The new process will also be fully accessible to the superintendent rank to apply for the gateway, where under the old PNAC system it was very unusual for a superintendent to be able to apply and access the course. Most applications were from the chief superintendent rank. The chief superintendent rank and ACC rank share similar 'job sizing', but the gap between a pay point 3 chief superintendent and first pay point ACC is approximately £14K and t £27K to a top ACC pay point. It is therefore imperative that the chief superintendent pay scale remains attractive to prevent officers 'leap frogging' the rank. Also, the chief superintendent rank is the most senior operational role in policing and undertakes the vast majority of Gold/strategic firearms commander roles. It is important that experience remains in this role to protect the service and the public. Even with the increase of £5675 there will still remain an uplift of approximately £8K between top rate chief superintendent and first pay point ACC.
Assist with throughput to assistant chief constable/commissioner	See above
Perception that the service has not	Since the launch of the Police Uplift
looked at increasing the numbers of chief superintendents	Programme, the PSA has lobbied the home secretary, the NPPC chair, the uplift programme lead and all chief constables to

encourage them to increase the level of superintending ranks to the level that were serving before the service lost 20K officers, ensuring appropriate levels of senior supervision. (Evidence of this can be found at Appendix 2). The total 'on costs' for a top rate chief superintendent is approximately £145k, so for the equivalent of the cost associated with the £5675 uplift proposal (£900K), the service could increase the overall chief superintending ranks by only 7 chief superintendents. How such a change could affect the morale and motivation of lower ranks at a time when there has been a significant increase in the cost of living How such a change could affect the morale and motivation of lower ranks at a time when there has been a significant increase in the cost of living How such a change could affect the morale and motivation of lower ranks at a time when there has been a significant increase in the cost of living How such a change could affect the morale and motivation of lower ranks at a time when there has been a significant increase in the cost of living How such a change could affect the morale and motivation of lower ranks at a time when there has been a significant increase in the cost of living
conscious bias against higher earners. This does not provide procedural justice and adds to the critical issues facing the service with regards to the retention of experienced
Pay anomalies relating to the rank of chief inspector have yet to be addressed The NPCC National Reward Team and the members of the Police Consultative Forum want to address all anomalies in the pay/rank structure. However, due to funding restrictions, the anomalies are being addressed on a priority basis, as part of a wider strategy. Changes have been made to the constable and sergeant pay scale and it is deemed that the chief superintendent issue is the next priority.
PRRB has not been able to discuss The PSA is providing written and verbal
the proposal with the PSA evidence to this year's PRRB process
We will want to consider the The NPCC has requested that it returns to
proposal on chief superintendent the Senior Salaries Review Board. They
pay alongside the future pay have notified us that they will be returning to
reforms for chief officers that process in the 2024/25 pay round. Therefore, this is the only year that the
PRRB will be able to consider the chief
superintendent pay proposal alongside the
future pay reforms for chief officers.

5.9 We are also aware that as part of the PRRB's site visits this year, those PSA members who have attended the sessions have been asked directly about this proposal. Please note the letter from the Metropolitan Police PSA branch chair to the PRRB chair and their response:



9th December 2022 By email Dear Zoe.

Police Superintendents' Association Ltd

E District c/o Met Command & Control Lambeth Headquarters 109 Lambeth Road London SE1 7LP

As the Chair of the Metropolitan Police Branch, representing approximately 250 members from the Superintendent and Chief Superintendent ranks, I am writing to thank you personally for attending New Scotland Yard last Wednesday to engage with our members as part of your role as the PRRB Chair.

Unfortunately, due to unforeseen operational and strategic demands, neither I nor any of my Chief Superintending colleagues were able to make the meeting. I have, however, managed to receive a briefing from the meeting and note that you specifically raised with the group the NPCC's recommendation that pay point 3 of the Chief Superintendents' pay scale should be increased by £5675.

In relation to this recommendation, I would like to put on record on behalf of my members that we fully support this recommendation and would hope that as part of this year's process the PRRB can consider the NPCC proposal and make a recommendation to the Home Secretary.

Given the breadth of your role and the pressures upon you, it is not lost on me or my membership that this meeting represented a significant commitment of your time, and I am very grateful that your visit enabled you to hear the views of PSA members.

If you require any more information please contact me. As this is being routed to you via the PRRB Secretariat I would appreciate an acknowledgement. Yours sincerely,

Chief Superintendent Kris Wright

Chair of MPS and E District PSAEW



Police Remuneration Review Body

Chief Superintendent Kris Wright
Chair of MPS and E District PSA
Police Superintendents' Association Ltd c/o Met Command and Control Lambeth
Headquarters
109 Lambeth Road
London SE1 7LP

Dear Kris

21 December 2022

Thank you very much for your letter of 9 December. I appreciate you taking the time to write to me. While I was disappointed not to meet a Chief Superintendent on the day of the Metropolitan Police visit, I understood completely that operational matters took priority. Thank you also for confirming that the PSA's Metropolitan Police Branch supports the NPCC's proposal to uplift Chief Superintendent pay point 3.

Our visits programme enables us to hear directly from officers about their concerns and provides important context for our work. My visit to New Scotland Yard on 30 November was very worthwhile and the discussion group with Superintendents was extremely informative, as were all the other sessions. Please convey my thanks to your members for taking part.

I do hope that you and your colleagues are able to take part in the next PRRB visit to the Metropolitan Police.

Yours sincerely

Zoë Billingham CBE Chair, Police Remuneration Review Body

5.10 This proposal has been in consideration since 2019, we therefore request that the PRRB decides on the evidence provided by the PSA/SANI and the NPCC to either recommend or not recommend the change to the home secretary as part of the ninth PRRB report. (Please note if the PRRB makes a comment or asks for further information from stakeholders, our experience is that the matter will not be progressed. It is only formal PRRB recommendations that lead to an outcome).

2. Uplift of the £20 On - Call Allowance & the Inclusion in Pensionable Pay

5.11 On – call is a voluntary activity. There is no police regulation that can be used to enforce an officer of any rank to undertake on-call duties. The regulations that are

available to chief constables, are the regulations that allow them to set and alter shift patterns.

- 5.12 On call is a resource efficient method used by every force to cover the highest risk areas of policing outside of normal office hours. Every night and weekend across the country there will be hundreds of superintending and federated ranks, who have their freedoms restricted and who have made themselves available to respond to the various high-risk issues that the police service needs to deal with. Examples include senior investigating officers, authorising officers for undercover operations, counter terrorism firearms commanders etc
- 5.13 For giving up their freedoms and ensuring they have alternative caring responsibilities etc. available officers of all ranks are paid £20 for a 24-hour on call period. If these officers were not 'covering' the risk through an on-call function, the chief constable would need to have an officer on duty available and would be paying their full salary costs. The latest PSA survey indicates that 93% of superintendents perform an on-call function outside their core hours of duty.
- 5.14 Police Scotland has this year 'negotiated' via the police negotiating machinery an increase of 5% to the 24-hour rate, and that the payment becomes reckonable for pensionable purposes.
- 5.15 The PSA requests that the PRRB recommends to the home secretary as part of its ninth report, that the 24-hour on call rate be increased by 5% and that the payment becomes reckonable for pensionable purposes. This would reward those officers who are committing to manage the highest risk in the service, in addition to their daily duties and responsibilities.

3. Uplift to Mileage and Essential User Payment

- 5.16 Mileage and essential user allowance are governed by motor vehicle allowances under Regulation 3 at 4 Annex U.
- 5.17 In the second report of the PRRB (2016) it recommended:

Our comment and recommendation

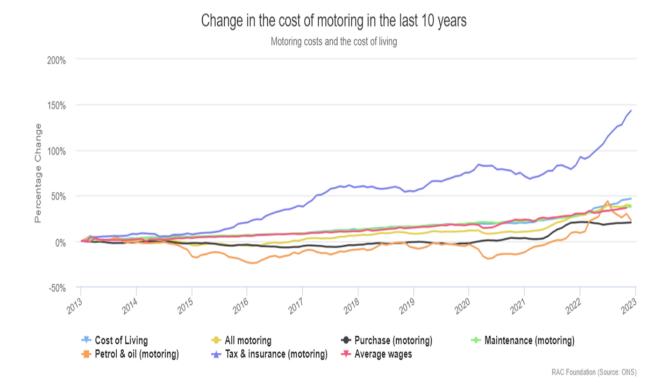
3.51 We are aware that the issues around Motor Vehicle Allowances have been left unresolved following the Winsor Review and that there has been no review since 2012. As a result, we note that the majority of local authorities have now moved to HMRC rates and that some police forces had followed suit with some others using locally agreed mileage rates. There was consistent support for a move to HMRC

rates from the NPCC, APCC and MPS. We also note the staff associations' view that a nationally determined scheme should be retained. We therefore conclude that the overall structure remains appropriate, including the values of the essential user lump sums, and that this structure provides some local flexibility for chief officers to approve essential users but should be subject to regular review. In the light of the general move to HMRC rates and in the absence of other up-to-date comparative information, we recommend that the Motor Vehicle Allowance mileage rates for police officers should be the HMRC rates for both essential and casual users. We note these rates distinguish between mileage up to 10,000 miles and above, although they do not differentiate by engine size. Any future changes in HMRC mileage rates should be read across to police officer rates

Recommendation 5. We recommend that Motor Vehicle Allowances mileage rates for federated and superintending ranks should be the prevailing HMRC rates (currently 45p per mile for the first 10,000 miles and 25p per mile thereafter) for essential and casual users from 1 September 2016. The current structure and values for the essential users' lump sums should remain.

5.18 The rates set above have not changed since 2016.

5.19 The monthly amount an officer receives as a fixed amount, known as an essential users' allowance, is paid to compensate the officer for ensuring their car is available, taxed, road worthy and insured for business use. This amount is currently £103.25 (before being taxed at an officer's marginal rate of tax). This has remained the same since 2010. The last review of this allowance was undertaken in 2010 and is detailed in a document entitled 'CAR ALLOWANCES 2010 REPORT OF THE TECHNICAL ADVISERS' (see Appendix 3). The cost of motoring has significantly increased since 2010.



5.20 An employer can increase the amount paid for mileage above the HMRC rate. If this occurs, the employee must pay tax on the amount received over the tax free amount. This does not prevent a higher amount being paid.

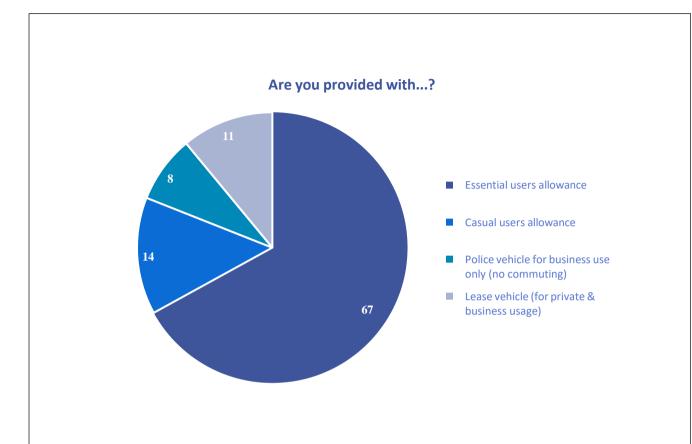
5.21 The monthly fixed amount could also be paid at a higher rate by the employer. This needs to be urgently reviewed.

5.22 There is ample evidence from the latest PSA pay survey completed in 2021 to show that the superintending ranks are using their vehicles for work purposes and receiving the fixed essential user compensation and essential user mileage. This compensation has not kept pace with motoring costs.

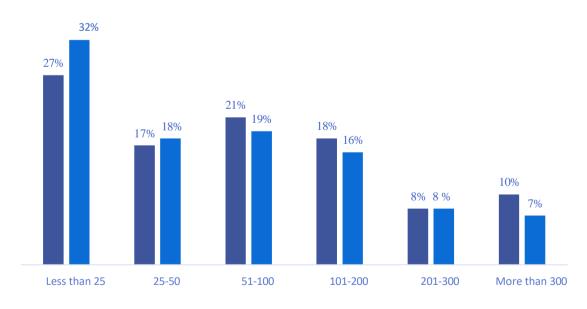
Business miles

83% of respondents said that they needed to travel by car for their role, down from 86% in 2020. Respondents this year spent, on average, 7.5 hours (trimmed mean) per week driving for their role. This has increased since last year when respondents spent on average 6 hours (trimmed mean) driving. The lower driving hours last year is likely to have been influenced by lockdown restrictions as a result of COVID-19. However, it is notable that the average hours spent driving in 2021 was also higher than the average of 7 hours (trimmed mean) respondents spent driving in 2019 prior to the pandemic.

The proportion of respondents provided with a police vehicle in order to travel for their role continues to decrease year-on-year. 18% this year said that they were provided with a vehicle, compared to 19% of respondents in 2020, 21% in 2019 and 25% in 2018. 67% of respondents who said that they travelled by car for their role said that they received Essential User's Allowance (up from 64% of respondents in 2020 and 58% of respondents in 2019), whilst 14% said that they received Casual User's Allowance (down from 17% of respondents in 2020 and 21% in 2019). Amongst respondents who said that they received Essential User's or Casual User's Allowance, respondents claimed on average 101 business miles per month (trimmed mean). Those in receipt of Essential User's Allowance claimed 107 business miles per month (trimmed mean), whilst those in receipt of Casual User's Allowance claimed on average 48 business miles per month (trimmed mean).







5.23 The PSA therefore requests that the PRRB recommends to the home secretary in its ninth report, that the Home Office works with the Police Consultative Forum, before the next PRRB submission, to undertake a review of the mileage rate. This will enable recommendations for an increase, which can be agreed by all stakeholders and submitted in the 2024/25 pay round for the PRRB to consider and make recommendations. With regards to the essential user fixed amount, it is requested that the PRRB makes a recommendation to immediately increase this amount as it has not been reviewed since 2010.

4. Temporary Variable Payments

5.24 Regulation 34 of the 2003 Police Regulations, Annex U states:

ANNEX U (AMENDMENT)	
REGULATION 34	
ALLOWANCES	

The following determination "Annex U (Amendment) – Allowances" is made by the Secretary of State under regulation 34 of the Police Regulations 2003 (S.I. 2003/527), following consultation in accordance with regulation 46 of those Regulations. This determination was made on 21 May 2021 and amends the determination "Annex U - Allowances" ("Annex U"). The amendments come into force on 1 July 2021.

1) SUBSTITUTION OF PART 8, BONUS PAYMENTS

For Part 8 of Annex U, "BONUS PAYMENTS", substitute:

"8) BONUS PAYMENTS

A chief officer may award a payment of not less than £50 and not more than £2,000 to a member of their force where they are satisfied that the member concerned has performed work of an outstandingly demanding, unpleasant or important nature.".

2) SUBSTITUTION OF PART 15, HARD TO FILL ROLES AND DEMANDING SUPERINTENDENT ROLES

For Part 15 of Annex U, "HARD TO FILL ROLES AND DEMANDING SUPERINTENDENT ROLES", substitute:

"15) SERVICE CRITICAL SKILLS PAYMENT

- a) A chief officer may award a payment to an individual officer of a rank of chief superintendent or below of up to £5,000 per annum, to be known as the service critical skills payment, where the "service critical skills" criterion is met.
- b) For the purposes of sub-paragraph (a), the service critical skills criterion is met where the specific policing role in question requires a skill set that is essential to the delivery of an effective policing service and either:
 - (i) those skills are in demonstrably short supply and financial incentivisation is considered necessary to attract or retain those skills; or
 - (ii) the role in question is "hard-to-fill" and financial incentivisation is considered necessary to either attract or retain those skills or to fill the role in question.
- c) For the purposes of sub-paragraph (b)(ii), a role is "hard-to-fill" if:
 - (i) it has not been possible to fill it despite advertising or posting attempts and this has resulted in an ongoing and unacceptably high vacancy rate; or
 - (ii) past levels of officer retention in the role have been poor or this situation can be reasonably predicted; or
 - (iii) for retention purposes, officers undertaking the role have been prevented from voluntarily applying for alternative roles.
- d) For the purposes of sub-paragraph (c)(i), a vacancy is deemed to have been filled once a successful applicant is identified or a posting agreed. Delays in the actual posting taking place do not alone mean a role is "hard-to-fill".
- e) When awarding a service critical skills payment, a chief officer:
 - (i) shall set out the skill set and role on the basis of which an officer is receiving the payment, with reference to the requirements of paragraphs (a), (b) and (c) above; and
 - (ii) shall set out the payment amount in accordance with paragraph (a) and the frequency of payment in accordance with paragraph (g); and
 - (iii) may set out conditions which must be met for the payment to be made ¹; and
 - (iv) must notify the receiving officer in writing of the matters the chief officer sets out under sub-paragraphs (i) and (ii), and of any conditions under sub- paragraph (iii).
- f) A service critical skills payment (or a part thereof) must not be paid in the event that any of the conditions set out in accordance with sub-paragraph

- (e)(iii) have not been met, unless the chief officer considers it reasonable to make the payment.
- g) Subject to paragraph (f), a service critical skills payment may be paid:
 - 1. (i) as a one-off payment upon recruitment;
 - 2. (ii) as a one-off payment on achieving a specific qualification that is required to carry out the role;
 - 3. (iii) every 3 months as a lump sum in monthly salary payment;
 - 4. (iv) on a monthly basis as part of monthly salary;
 - 5. (v) as a lump sum in salary 12 months after appointment; or
 - 6. (vi) in instalments.
- h) Service critical skills payments may only be made under this part (15) in relation to time served in eligible roles between 1 July 2021 and 30 June 2023.

16) RECOGNITION OF WORKLOAD PAYMENT

- a) A chief officer may award a payment to an officer of superintending rank of up to £5,000 per annum, to be known as the recognition of workload payment, in circumstances where the chief officer determines that the demands placed on the officer exceed those usually placed on other officers of the same rank.
- b) A chief officer may only determine that the demands placed on an officer exceed those usually placed on other officers of the same rank, if the officer's role involves at least one of the following factors:
 - (i) unusually frequent antisocial working hours or high levels of 'out of hours' contact or disruption, and compensatory payment under the Police Regulations 2003 is not made or is considered insufficient compensation for the level of disruption;
 - (ii) command responsibilities with multiple public, not-for-profit or private sector stakeholders, crossing force internal geographic boundaries;
 - (iii) command responsibilities outside force boundaries, in the form of collaboration or national responsibilities;
 - (iv) accountability for areas of policing that attract considerable personal or career risk by virtue of their nature, level of public scrutiny or public profile;
 - (v) lengthy and regular periods of travel to fulfil command responsibilities;
 - (vi) a span of control or direct responsibility, where geographic size or officer and staff headcount is deemed exceptionally high, having regard to established local norms;

- (vii) command of officers and staff from more than one force and there are differing organisational cultures, policies, procedures and operating practices within the command;
- (viii) exceptionally high operational demand of continuing intensity;
- (ix) the management of a large change process.
- c) A recognition of workload payment may be paid:
 - (i) as a one-off payment upon posting;
 - (ii) on a monthly basis as part of monthly salary;
 - (iii) every 3 months as a lump sum in monthly salary payment;
 - (iv) as an ongoing lump sum in salary every 12 months.
- d) When awarding a recognition of workload payment, a chief officer:
 - (i) shall set out the considerations on the basis of which an officer is receiving the payment, with reference to the requirements of paragraph (b) above; and
 - (ii) shall set out the payment amount in accordance with paragraph (a) and the frequency of payment in accordance with paragraph (c); and
 - (iii) must notify the receiving officer in writing of the matters the chief officer sets out under sub-paragraphs (i) and (ii).
- e) Recognition of workload payments may only be made under this part (16) in relation to time served in eligible roles between 1 July 2021 and 30 June 2023.".
- 5.25 The two sections that have been highlighted insert a 'sunset' clause, which means that if the regulation is not made permanent or the sunset clause is not extended, the ability to make payments will cease on the 30th June 2023.
- 5.26 These payments, according to data shared by the NPCC National Reward Team via the Police Consultative Forum, are currently being paid to thousands of officers at all ranks across the country (the PSA survey indicates that 13% of superintendents receive a payment). It is therefore a significant concern to the PSA that during a cost of living crisis, those that have volunteered to undertake the most demanding jobs or are in 'service critical roles' that are either 'hard to fill' or the skills are in 'short supply', will see a significant drop to their income, potentially, losing their motivation to undertake these roles.
- 5.27 The PSA requests that the PRRB makes a recommendation in its ninth report to the home secretary, that the two sunset clauses are removed and the current provisions within the regulation are made permanent.

6. SANI's Specific Evidence and Requests to the PRRB

- 6.1 The following paragraphs outline the specific requests of SANI to the PRRB:
- 6.2 Maintaining parity of pay with colleagues in Home Office forces in respect of core pay scales. This has been a long standing request to ensure the continued ability for cross force co-operation, and to secure the recruitment into and retention of superintending ranks in the PSNI. The 2022 pay survey has revealed that 56% of the superintending ranks are dissatisfied with their overall remuneration, an increase of 6% on the previous survey. On top of this, SANI is being asked to make a submission to the PRRB, when the previous submission has yet to be agreed. This has an adverse impact on morale with 58% of respondents to the pay survey reporting lower morale compared to 12 months ago.
- 6.3 An increase in pay scales and the Northern Ireland Transitional Allowance in line with the cost of living. In the 2022 pay survey, 84% of respondents disagree that with the current pay increases, they can maintain their standard of living. The threat level in Northern Ireland is substantial with officers not able to live a normal life due to the fear of being targeted by terrorists.
- 6.4 Payment for rest days and public holidays that cannot be taken due to exigencies of duty and an extension of their availability to 24 months. SANI members continue to report the loss of rest days owing, which with the ongoing reduction in numbers within the superintending ranks, can only lead to increased workloads. We continue to see this impacting on members wellbeing, resulting in absences due to stress and mental health issues. The unique policing environment members operate in, demands time to recuperate which at present they are being denied.
- 6.5 Consideration be given to raising chief superintendents pay point 3 by £5,675. after applying any agreed annual increases to recognise the increased responsibility similar to that at chief officer rank. The PSA and NPCC evidence included in their reports lays out the basis for this request, which if parity is to be maintained must be extended to our members also. SANI has seen an increase in members leaving to join other forces to secure more beneficial terms which will only increase if members are not treated equitably.

7. PSA & SANI Evidence for a September 23 Pay Award

7.1 In conjunction with the NPCC and other stakeholders the PSA wish to highlight the fact that policing has seen a real term pay cut since September 2010. To provide further detail the Table below has been prepared by compiling the data available from the UK.GOV website and from data published by the Office of National Statistics.

YEAR (Sept)	PRRB Recommendation	Government Award	Inflation (12- month Sept *CPI rate)	Outcome (Consolidated Pay)	
<u>2015</u>	<u>1%</u>	<u>1%</u>	<u>-0.1%</u>	<u>+ 1.1%</u>	
<u>2016</u>	<u>1%</u>	<u>1%</u>	<u>1%</u>	0.0%	
2017	<u>2%</u>	1%/1% NC	<u>3%</u>	<u>- 2 %</u>	
<u>2018</u>	1% NC +2%	<u>2%</u>	2.7%	<u>- 0.7%</u>	
<u>2019</u>	<u>2.5%</u>	2.5%	<u>1.7%</u>	+ 0.8%	
<u>2020</u>	<u>2.5%</u>	<u>2.5%</u>	0.5%	<u>+ 2.0%</u>	
<u>2021</u>	Pay Pause	<u>0%</u>	3.1%	<u>- 3.1%</u>	
<u>2022</u>	<u>2.1% - 2.7%</u>	<u>2.1% - 2.7%</u>	<u>10.1%</u> (July)	<u>- 8% / - 7.4%</u>	
Total Variance: -9.9% / 9.3%					

- 7.2 This table accurately demonstrates the chronology and outcome with regards to police pay awards since 2015, when the PRRB was introduced (it does not detail the suppression of police pay during the previous years see appendix 1). The key points to note are as follows:
 - Cumulatively over the period of pay awards between 2015 and 2022 inflation has increased by 22%.
 - During this same time the superintending ranks have seen pay rises ranging between 12.1 and 12.7%, depending on their rank. Chief superintendents seeing the lower increase.
 - During the same period the PRRB has recommended cumulative pay rises of between 14.1 and 14.7%. This has effectively supressed pay for the superintending ranks by between 7.3 and 7.9%.
 - The home secretary, having regard for the PRRB's recommendations during the same period, has awarded cumulative pay rises ranging between 12.1 and 12.7%. This has effectively supressed pay for the superintending ranks by between 9.3 and 9.9%.

- This suppression of pay also effects the pension entitlement as an officer's pension is directly linked to their rate of pay. Not keeping pace with inflation effects the officer's entire remuneration package.
- During this period the government has weakened the public sector, including the police workforce. This is evidenced by policies that have capped public sector awards at 1%, awarded non-consolidated pay, not followed the recommendations of the PRRB and, instead, made a lower award. In 2021 the home secretary dictated that there would be no pay award for police officers, even before the PRRB heard evidence or was able to make a recommendation, when inflation was rising and at 3.1%.
- 2019 and 2020 saw the PRRB make above inflation recommendations and both of these recommendations were accepted by the government. This sets a precedent for the PRRB to set pay rises above inflation.

To note (as of Jan 2023):

(Source= https://www.bankofengland.co.uk/monetary-policy/inflation):

Inflation and the 2% target

We are responsible for keeping inflation (price rises) low and stable. The Government has set us a target of keeping inflation at 2%

Current inflation rate **10.7%**Target 2%

7.3 Each year, PRRB stakeholders are asked to detail what award they believe should be recommended by the PRRB to the home secretary and include any associated supporting evidence. This year, as the pay of police officers has been suppressed for so long, the employer (NPCC), and other stakeholders have worked together and come to an agreed position that policing has suffered an almost 17% real term pay cut since 2010. The PSA believes that any award that is less than the rate of inflation (CPI January 2023 10.7%), will compound this situation and result in a further pay cut, continuing to suppress real-term earnings of a workforce that cannot protest or withhold its labour. A pay award that matches inflation is the only fair and acceptable recommendation in the circumstances. The only type of pay rise that the PSA supports is an equal percentage rise across all ranks. The flat rate award (£1900) recommended by the PRRB in the last pay round penalised longer serving officers and specifically in relation to superintendents it provided on average a 2% pay award when inflation was 11%.

7.4 Also, each year when the PSA attends to provide verbal evidence to the PRRB, we are consistently asked two questions similar to the following:

- 1. Is the pay award you are suggesting affordable?
- 2. Is there a vacancy rate/issue with filling superintendent posts?

7.5 It is understandable that these questions need to be answered, but as part of this round the PSA would ask that the first question is directed to the NPCC/APCC and

Home Office as they are responsible for police budgets. The proposals we have put forward in our submission are as follows:

PROPOSAL	AFFORDABILITY
A pay award that matches the rate of	See NPCC joint statement on police
inflation (CPI – January 2023 10.7%)	officer pay – see appendix 1
Uplift to pay point 3 chief	See NPCC submission where it is stated
superintendent	the costs will be absorbed into the police budget
Making TVP permanent	The funding is already being spent, so this involves no new funding
Increase and pensionable on-call	This proposal would need to be costed,
allowance	but the alternative is to see less officers
	volunteering for on-call and more costly
	shift pattern arrangements being funded
	by forces
Review of motor vehicle allowance	The PSA proposal at this stage is to seek
	a formal review within a 12 month or less
	time scale, so findings and agreed
	proposals can be submitted to the PRRB as part of the 2024/25 pay round. With
	regards to the request to increase the
	essential users allowance, if an increase
	is not awarded forces will eventually see
	an increase in their fleet costs or accept
	a reduced level of service as officers will
	withdraw from using their own vehicles
	for police purposes.

7.6 The PSA also challenges the relevance of the second question because policing is a closed linear career structure, and currently the only way officers have been able to ensure their income keeps pace with inflation or increases, is to progress through the rank structure. The levels of superintending ranks have reduced over the years and are controlled by individual chief constables, so the number of posts will always match the amount of officers. The use of temporarily promoted superintending ranks is prolific, as of January 2023 the PSA member database shows that 20% of all superintending ranks are temporarily promoted. The only vacancies at the superintending ranks are likely to occur are if:

- The working hours and pressures continue to deteriorate to such a level that junior ranks notice the wellbeing issues such working conditions create, and therefore avoid applying the roles
- An exam is introduced as a gateway to the rank
- It becomes financially beneficial to officers to undertake the new PNAC replacement course and leapfrog the chief superintendent rank
- The superintending ranks become contracted
- The pay differentials reduce between ranks

7.7 During the December 2022 pay survey the PSA asked questions about members' views on pay. Please see the findings:

Title: PSA/SANI Pay Survey Initial Findings

Author: Bryony Lewis

Please note, these findings represent Superintendents and Chief Superintendents from all Home Office forces across England and Wales, the British Transport Police, the Police Service of Northern Ireland and the Civil Nuclear Constabulary.

Satisfaction with pay and allowances

How satisfied are you with each of the following?	2022			2021		
	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied
Basic pay	45%	16%	39%	37%	17%	46%
Allowances	63%	17%	20%	54%	20%	25%
Overall remuneration (pay and allowances)	56%	18%	26%	48%	20%	32%
Pension	61%	13%	25%	63%	13%	23%

Please rate the extent to which you agree or disagree that you receive the following within your role:	2022			2021		
	Disagree	Neither agree nor disagree	Agree	Disagree	Neither agree nor disagree	Agree
Fair pay compared to employees doing similar work in other organisations	82%	9%	9%	79%	10%	11%
Pay increases to maintain my standard of living	84%	8%	8%	74%	14%	12%

	2022	2			2021		
Do you currently receive any of the following?	Yes	No	l don't know	Yes	No	l don't know	
Housing Emoluments (Allowances/Rent Allowance)	20%	80%	<1%	29%	71%	<1%	
Northern Ireland Transitional Allowance ¹	98%	0%	2%	96%	0%	4%	
Central Services Allowance	2%	97%	<1%	3%	97%	1%	
Targeted Variable Payment(s) ²	13%	86%	1%	-	-	-	

How satisfied are you with the amount of the following?	2022			2021		
	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied	Dissatisfied	Neither satisfied nor dissatisfied	Satisfied
Housing Emoluments (Allowances/Rent Allowance)	40%	25%	35%	34%	21%	45%
Northern Ireland Transitional Allowance ³	32%	30%	38%	50%	19%	31%
Central Services Allowance	40%	45%	15%	40%	44%	16%
Targeted Variable Payment(s) ⁴	49%	20%	31%	-	-	-

¹ Please note – the data reported here are taken from respondents saying that they currently serve within the Police Service of Northern Ireland.

 $^{^{2}}$ Please note – There is no comparable data for 2021 as TVPs were added for the 2022 survey.

³ Please note – the data reported here are taken from respondents saying that they currently serve within the Police Service of Northern Ireland.

 $^{^4}$ Please note – There is no comparable data for 2021 as TVPs were added for the 2022 survey.

What is the annual amount of your London or South East Allowance? (To the nearest amount)	2022	2021
£0 (I do not receive a London or South East Allowance)	10%	13%
£500	1%	1%
£1000	4%	10%
£1500	6%	9%
£2000	14%	23%
£2500	10%	10%
£3000	31%	11%
£5338	25%	23%

8. Summary of Results from the PSA December 2022 Pay Survey

Title: PSA/SANI Pay Survey Initial Findings

Author: Bryony Lewis

Please note, these findings represent Superintendents and Chief
Superintendents from all Home Office forces across England and Wales, the
British Transport Police, the Police Service of Northern Ireland and the Civil
Nuclear Constabulary.

1. Demographics

2021 2022 **Superintendent** 74% 76% **Chief Superintendent** 26% 24% **70% 72%**⁵ Male **Female** 30% 28% **Ethnic Minority Background** 4% 4% White 96% 96% Under 40 years old 4% 4% 40 - 44 years old **23% 23%** 45 - 49 years old 40% 39% 50 - 55 years old 30% 30% <u>4%</u> Over 55 years old 3% One year or less in rank 39% **38%**

⁵ Please note - the 2021 PSA/SANI Pay Survey findings included all forces, whereas this year, Bermuda, Gibraltar and the Isle of Man have been removed from analysis at request of the PSA. To ensure 2022 findings are comparable with 2021, 2021 analysis has been rerun without Bermuda, Gibraltar and the Isle of Man. As such, this figure differs from that in the 2021 Headline Report/Data Warehouse when 71% of respondents said that they were male.

	<u>2022</u>	<u>2021</u>
2 - 3 years in rank	<u>35%</u>	<u>31%</u>
4 – 5 years in rank	<u>15%</u>	<u>19%</u>
6 – 7 years in rank	<u>7%</u>	<u>6%</u>
8 years or more in rank	<u>5%</u>	<u>5%</u>
<u>Full-time</u>	98%	99%
Part-time	<1%	<1%
Compressed hours	<u>2%</u>	1%

Have you lived with a physical or neurological condition for more than a year that has a substantial effect on your daily life, even if you do not consider yourself to be 'disabled' and manage the impact effectively?	<u>2022</u>	<u>2021</u>
<u>Yes</u>	21%	18%
<u>No</u>	<u>76%</u>	<u>78%</u>
Prefer not to say	3%	<u>4%</u>

Has your organisation given you the confidence to share with them the condition you have? ⁶	2022	2021
Yes	<u>56%</u>	<u>54%</u>
<u>No</u>	<u>36%</u>	38%
Prefer not to say	<u>8%</u>	<u>8%</u>

-

 $^{^{\}rm 6}$ Please note – this question was only asked to respondents who answered 'yes' to the previous question.

You mentioned that you shared information about your condition with your organisation. Were any reasonable adjustments agreed with your force as a result (including flexible/agile working)? ⁷	<u>2022</u>
<u>Yes</u>	<u>43%</u>
<u>No</u>	14%
N/A I do not require any reasonable adjustment	<u>42%</u>
Prefer not to say	1%

2. Satisfaction with pay and allowances

How satisfied	<u>2022</u>	<u>2022</u>			<u>2021</u>		
are you with each of the following?	<u>Dissatisfied</u>	Neither satisfied nor dissatisfied	<u>Satisfied</u>	Dissatisfied	Neither satisfied nor dissatisfied	<u>Satisfied</u>	
Basic pay	<u>45%</u>	<u>16%</u>	<u>39%</u>	<u>37%</u>	<u>17%</u>	<u>46%</u>	
Allowances	<u>63%</u>	<u>17%</u>	<u>20%</u>	<u>54%</u>	<u>20%</u>	<u>25%</u>	
Overall remuneration (pay and allowances)	<u>56%</u>	18%	<u>26%</u>	<u>48%</u>	<u>20%</u>	<u>32%</u>	
Pension	<u>61%</u>	<u>13%</u>	<u>25%</u>	<u>63%</u>	<u>13%</u>	<u>23%</u>	

-

 $^{^{7}}$ Please note – this question was only asked to respondents who answered 'yes' to previous questions.

Please rate the extent to which	2022			<u>2021</u>		
you agree or disagree that you receive the following within your role:	<u>Disagree</u>	Neither agree nor disagree	<u>Agree</u>	<u>Disagree</u>	Neither agree nor disagree	<u>Agree</u>
Fair pay compared to employees doing similar work in other organisations	82%	9%	9%	<u>79%</u>	10%	<u>11%</u>
Pay increases to maintain my standard of living	84%	<u>8%</u>	<u>8%</u>	<u>74%</u>	14%	12%

	2022	<u>2022</u>			<u>2021</u>		
Do you currently receive any of the following?	<u>Yes</u>	<u>No</u>	l don't know	<u>Yes</u>	<u>No</u>	l don't know	
Housing Emoluments (Allowances/Rent Allowance)	20%	80%	<1%	<u>29%</u>	71%	<u><1%</u>	
Northern Ireland Transitional Allowance ⁸	98%	0%	<u>2%</u>	96%	<u>0%</u>	<u>4%</u>	
Central Services Allowance	<u>2%</u>	<u>97%</u>	<u><1%</u>	<u>3%</u>	<u>97%</u>	<u>1%</u>	
Targeted Variable Payment(s)9	<u>13%</u>	86%	<u>1%</u>	=	=	=	

⁸ Please note – the data reported here are taken from respondents saying that they currently serve within the Police Service of Northern Ireland.

 $^{^{9}}$ Please note – There is no comparable data for 2021 as TVPs were added for the 2022 survey.

Harris and afficial area	2022	<u>2022</u>			2021		
How satisfied are you with the amount of the following?	Dissatisfied	Neither satisfied nor dissatisfied	<u>Satisfied</u>	Dissatisfied	Neither satisfied nor dissatisfied	<u>Satisfied</u>	
Housing Emoluments (Allowances/Rent Allowance)	40%	<u>25%</u>	<u>35%</u>	34%	<u>21%</u>	<u>45%</u>	
Northern Ireland Transitional Allowance ¹⁰	32%	30%	38%	<u>50%</u>	<u>19%</u>	31%	
Central Services Allowance	<u>40%</u>	<u>45%</u>	<u>15%</u>	<u>40%</u>	44%	<u>16%</u>	
Targeted Variable Payment(s) ¹¹	49%	20%	<u>31%</u>	=	<u>-</u>	=	

What is the annual amount of your London or South East Allowance? (To the nearest amount)	2022	<u>2021</u>
£0 (I do not receive a London or South East Allowance)	10%	<u>13%</u>
£500	<u>1%</u>	<u>1%</u>
£1000	<u>4%</u>	<u>10%</u>
£1500	<u>6%</u>	<u>9%</u>
£2000	14%	<u>23%</u>
£2500	10%	10%
£3000	31%	11%
£5338	<u>25%</u>	23%

.

¹⁰ Please note – the data reported here are taken from respondents saying that they currently serve within the Police Service of Northern Ireland.

 $^{^{\}rm 11}$ Please note – There is no comparable data for 2021 as TVPs were added for the 2022 survey.

3. Cost of Living

	2022			<u>2021</u>		
Please rate the extent to which you agree or disagree with the following:	<u>Agree</u>	Neither agree nor disagree	<u>Disagree</u>	<u>Agree</u>	Neither agree nor disagree	<u>Disagree</u>
I get enough money from my job to live comfortably	<u>50%</u>	20%	<u>30%</u>	<u>61%</u>	<u>18%</u>	<u>21%</u>
I am fairly paid considering the amount of experience and training I have	20%	<u>15%</u>	<u>65%</u>	25%	16%	60%
I am fairly paid considering the amount of responsibilities I have within my job	<u>11%</u>	9%	80%	<u>15%</u>	<u>8%</u>	<u>77%</u>
I am fairly paid considering the amount of effort I put into my job	<u>11%</u>	<u>12%</u>	<u>78%</u>	14%	<u>12%</u>	<u>74%</u>
I am fairly paid considering the stresses and strains of my job	<u>8%</u>	9%	83%	<u>11%</u>	<u>8%</u>	<u>82%</u>
I am fairly paid considering the amount of hours that I work in order to do my job	<u>9%</u>	<u>11%</u>	<u>81%</u>	<u>11%</u>	11%	<u>78%</u>

Compared to five years ago, do you feel financially?	2022	<u>2021</u>
Worse off	<u>53%</u>	38%
About the same	29%	<u>35%</u>
Better off	17%	27%

Over the last month, has your cost of living ¹²	2022	ONS ¹³
Increased	97%	89%
Stayed the same	2%	10%
Decreased	1%	1%

Over the last month, for what reasons has your cost of living increased? Please tick all that apply. ¹⁴	2022	ONS ¹⁵
My gas or electricity bills have increased	96%	81%
My rent or mortgage costs have increased	43%	<u>16%</u>
The price of my food shop has increased	99%	<u>95%</u>
The price of my fuel has increased	95%	<u>75%</u>
The price of my public transport has increased	19%	13%

_

 $^{^{\}rm 12}$ Please note – there is no comparable data from 2021 as this question is new for the 2022 survey.

¹³ Office for National Statistics (2022). Data set: Opinion and Lifestyle survey [June-September dataset]. Retrieved from: https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/datasets/impactofincreasedcostof-livingonadultsacrossgreatbritain Please Note – the ONS data was not collected during the same time period as the PSA data and so please use caution when making comparisons.

 $^{^{14}}$ Please note – there is no comparable data from 2021 as this question is new for the 2022 survey.

¹⁵ Office for National Statistics (2022). Data set: Opinion and Lifestyle survey [June-September dataset]. Retrieved from: https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/datasets/impactofincreasedcostof livingonadultsacrossgreatbritain

Which of the following are you doing because your cost of living has increased? Please tick all that apply. ¹⁶	2022	ONS ¹⁷
Shopping around more	<u>75%</u>	39%
Spending less on food shopping and essentials	<u>65%</u>	44%
Spending less on non-essentials	<u>85%</u>	<u>62%</u>
Cutting back on non-essential journeys in my vehicle	70%	44%
Using less fuel such as gas or electricity in my home	86%	<u>52%</u>
Using my savings	48%	26%
Using credit more than usual, for example, credit cards, loans or overdrafts	34%	14%
None of the above	<u>1%</u>	8%

• Impact of pension on intention to stay or leave

What impact does your pension have on your intention to stay in or leave the police service?	2022	<u>2021</u>
Increases my intention to stay	43%	41%
Has no effect on my intention to stay or leave	18%	21%
Increases my intention to leave	40%	38%

_

 $^{^{16}}$ Please note – there is no comparable data from 2021 as this question is new for the 2022 survey.

¹⁷ Office for National Statistics (2022). Data set: Opinion and Lifestyle survey [June-September dataset]. Retrieved from: https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/datasets/impactofincreasedcostof-livingonadultsacrossgreatbritain

What is it about your pension that increases your intention to stay? (Tick all that apply)	2022	<u>2021</u>
The level of pension provided is good by comparison to other jobs	<u>54%</u>	60%
Despite the recent changes, I am still able to retire at an earlier date than most people	<u>58%</u>	<u>54%</u>
I know that my accrued pension is secure within a government sponsored scheme	40%	<u>35%</u>
I want to build a larger pension	24%	<u>22%</u>
The benefits provided for me should I become ill are good	36%	<u>36%</u>
The benefits provided for my surviving dependants if I die are good	<u>45%</u>	42%
I can already retire with an immediate pension but if I stay longer I will have an even bigger pension	10%	9%

Proportion of respondents potentially affected by immediate detriment¹⁸.

2022

<u>11%</u>

_

¹⁸ Please note – this is the proportion of respondents who said that they have either 'accrued 30 years continuous pensionable service in the PPS (1987/1988) and CARE Scheme (2015)', or said that they will reach '30 years' pensionable service in one or more pension schemes before 1st October 2023'. This is not the same as the proportion of respondents who provided their contact details and consent to be contacted by the PSA about this.

What is it about your pension that increases your intention to leave? (tick all that apply)	2022	<u>2021</u>
The level of my pension is too low	<u>13%</u>	10%
I don't trust government not to change our pensions for the worse again in the future	87%	85%
Due to the recent changes the pension I will receive is different to what I was led to expect	<u>76%</u>	<u>76%¹⁹</u>
I have reached pension age and so I can leave with an immediate pension	<u>11%</u>	<u>15%</u>
I believe I can get a better pension elsewhere	1%	<u>2%</u>
I can't get an accurate forecast of the pension I can expect to receive when I retire	<u>57%</u>	<u>59%</u>
I have to pay too much pension tax (Annual Allowance)	<u>66%</u>	<u>56%</u>
I can't access the money from my pension if I need to before I retire	16%	<u>15%</u>
The contributions I have to pay are too high/unaffordable	20%	12%
The likelihood of breaching the Lifetime Allowance tax threshold	<u>56%</u>	<u>58%</u>

_

¹⁹ Please note - the 2021 PSA/SANI Pay Survey findings included all forces, whereas this year, Bermuda, Gibraltar and the Isle of Man have been removed from analysis at request of the PSA. To ensure 2022 findings are comparable with 2021, 2021 analysis has been rerun without Bermuda, Gibraltar and the Isle of Man. As such, this figure differs from that in the 2021 Headline Report/Data Warehouse when 75% of respondents said that recent changes to their pension have increased their intention to leave.

• Targeted Variable Payments

Do you fulfil the criteria to be eligible to apply for a TVP payment since July 2021?							
<u>2022</u> <u>2021</u>							
<u>Yes</u>	<u>No</u>	<u>l don't</u> <u>know</u>	N/A	<u>Yes</u>	<u>No</u>	<u>l don't</u> <u>know</u>	<u>N/A</u>
<u>61%</u>	<u>17%</u>	<u>19%</u>	<u>3%</u>	<u>56%</u>	20%	<u>21%</u>	<u>3%</u>

You said that you fulfil the criteria to be eligible for a TVP since 1 July 2021. Have you applied to receive a TVP?					
2022 2021					
Yes No		Yes No			
28% 72% 17% 83%					

Was your application for a TVP successful?						
2022 2021						
<u>Yes</u>	<u>No</u>	I don't know (e.g. the application is still being considered)	<u>Yes</u>	<u>No</u>	I don't know (e.g. the application is still being considered)	
<u>72%</u>	24%	4%	<u>52%</u>	<u>22%</u>	<u>26%</u>	

You said that you fulfilled the criteria to be eligible for a TVP since 1 July 2021 but had not applied to receive one. What was your main reason for not applying? (Please select the one most relevant option from the list below)	<u>2022</u>	<u>2021</u>
I was put off applying as I was aware the scheme was not supported by my Chief Officers	41%	45%
I was not aware I was eligible	<u>29%</u>	<u>25%</u>
I do not agree with bonus payments as a method of payment for the superintending ranks	3%	4%
Applying for a bonus would be held against me by my employer	3%	<u>3%</u>
The process was too complex	<u><1%</u>	<u><1%</u>
I should not have to apply for a reward. If I have contributed sufficiently, I should be rewarded sufficiently.	8%	8%
I would prefer the extra money was spent elsewhere in policing	<u>2%</u>	<u>1%</u>

- Since 1 July	2022			<u>2021</u>				
2021, have you been awarded a?	<u>Yes</u>	<u>No</u>	l don't know	<u>N/A</u>	<u>Yes</u>	<u>No</u>	l don't know	<u>N/A</u>
Service Critical Skills Payment	<u>2%</u>	94%	<u>2%</u>	3%	<u>1%</u>	94%	<u>2%</u>	<u>3%</u>
A bonus payment	<u>6%</u>	<u>91%</u>	<u>2%</u>	<u>2%</u>	<u>3%</u>	93%	<u>1%</u>	<u>3%</u>

• Pay Reform Proposals

Has your line manager made you aware of the Pay Progression Standard (PPS) process and what will be expected of you within this process?

2022²⁰

Yes

No

I don't know/l can't remember

28%

67%

4%

Have you undertaken the PPS yourself since its introduction in April 2022?					
<u>2022²¹</u>					
<u>Yes</u>	<u>No</u>	<u>I don't know/l can't</u> <u>remember</u>			
<u>6%</u>	90%	<u>4%</u>			

Were you successful in the PPS process? ²²					
<u>2022²³</u>					
<u>Yes</u>	<u>No</u>	l don't know/l can't remember			
<u>71%</u>	<u>2%</u>	28%			

 $^{\rm 22}$ Please note – this question was only asked to respondents who answered 'yes' to the previous question.

 $^{^{20}}$ Please note – there is no comparable data from 2021 as this question is new for the 2022 survey.

²¹ Ibid.

 $^{^{23}}$ Please note – there is no comparable data from 2021 as this question is new for the 2022 survey.

Were you required to complete a local training requirement as part of the PPS?					
2022 ²⁴					
Yes No I don't know/I can't remember					
10%	71%	19%			

Do you have line management responsibilities?				
<u>2022²⁵</u>				
<u>Yes</u>	<u>No</u>			
<u>95%</u>	<u>5%</u>			

Have you been able to complete a PDR for every officer you line manage in the last 12 months?							
<u>2022²⁶</u>							
Yes No I don't know/l can't remember							
78%							

Have you been able to complete the PPS process for all your direct reports since April 2022?					
202227	2022 ²⁷				
<u>Yes</u>	<u>No</u>	<u>I don't know/l can't</u> <u>remember</u>			

 $^{^{24}}$ Please note – there is no comparable data from 2021 as this question is new for the 2022 survey.

²⁵ Ibid.

 $^{^{26}}$ Please note – there is no comparable data from 2021 as this question is new for the 2022 survey.

²⁷ Ibid.

<u>22%</u>	<u>62%</u>	<u>16%</u>			
You indicated that you have been unable to complete the PPS process for all your direct reports since April 2022. Have you been able to make all of your direct reports aware of the PPS process and what will be expected of them within this process? 2022 ²⁸					
Yes No I don't know/l can't remember					
31%	61%	<u>7%</u>			

• The Police Remuneration Review Body (PRRB)

To what extent are you aware of how the Police Remuneration Review Body (PRRB) works?							
2022 2021							
Not at all aware	Somewhat aware	Very aware	Not at all aware Somewhat aware				
23%	<u>66%</u>	<u>11%</u>	26%	<u>67%</u>	<u>7%</u>		

To what extent do you feel that the PRRB process itself is fair?						
<u>2022</u> <u>2021</u>						
<u>Unfair</u>	Neither fair nor unfair	<u>Fair</u>	<u>Unfair</u>	Neither fair nor unfair	<u>Fair</u>	
<u>62%</u>	34%	<u>4%</u>	<u>56%</u>	38%	<u>6%</u>	

²⁸ Ibid.

• Your morale

To what extent do you feel that pay awards resulting from the PRRB process have been fair?						
<u>2022</u> <u>2021</u>						
<u>Unfair</u>	Neither fair nor unfair	<u>Fair</u>	<u>Unfair</u>	Neither fair nor unfair	<u>Fair</u>	
<u>75%</u>	24%	<u>1%</u>	<u>71%</u>	<u>27%</u>	<u>2%</u>	

	2022			2021		
Please rate the level of morale for each of the following:	<u>Low</u>	Neither high nor low	<u>High</u>	Low	Neither high nor low	<u>High</u>
Your own morale	33%	33%	34%	<u>29%</u>	<u>31%</u>	<u>40%</u>
Morale in your department/command/collaboration	39%	34%	28%	34%	37%	<u>29%</u>
Morale in your force	<u>67%</u>	<u>26%</u>	<u>7%</u>	<u>59%</u>	34%	<u>7%</u>
Morale in the whole police service	<u>88%</u>	<u>11%</u>	<u>1%</u>	<u>79%</u>	<u>19%</u>	<u>2%</u>

How does your personal level of morale compare with 12 months ago?	2022	<u>2021</u>
Lower	<u>58%</u>	49%
About the same	34%	40%
<u>Higher</u>	8%	10%

At the present time, what	2022	2022			<u>2021</u>		
effect do the following factors have on your morale?:	A negative effect	No effect	A positive effect	A negative effect	No effect	A positive effect	
Your pay	<u>57%</u>	<u>29%</u>	14%	43%	32%	<u>25%</u>	
Your pension	<u>67%</u>	<u>18%</u>	<u>16%</u>	<u>69%</u>	<u>13%</u>	<u>18%</u>	
Uncertainty regarding your pension	<u>86%</u>	14%	<1%	90%	10%	<u><1%</u>	
Your workload and responsibilities	<u>67%</u>	23%	<u>10%</u>	<u>62%</u>	25%	<u>12%</u>	
Your work-life balance	<u>67%</u>	<u>22%</u>	<u>11%</u>	<u>65%</u>	20%	<u>15%</u>	
Your opportunities for development and promotion	<u>33%</u>	<u>42%</u>	<u>25%</u>	31%	41%	28%	
Your health and wellbeing	<u>54%</u>	<u>25%</u>	<u>21%</u>	<u>51%</u>	<u>25%</u>	<u>24%</u>	
How the Police are treated by the public	<u>72%</u>	24%	<u>4%</u>	<u>69%</u>	24%	<u>7%</u>	
How the Police are treated by the government	93%	<u>6%</u>	<u>1%</u>	90%	<u>9%</u>	<u>1%</u>	
How you are treated by your line manager	<u>10%</u>	20%	<u>70%</u>	13%29	20%	<u>66%</u>	
Taxation policies	84%	<u>16%</u>	<u><1%</u>	<u>85%</u>	14%	<u><1%</u>	

²⁹ Please note - the 2021 PSA/SANI Pay Survey findings included all forces, whereas this year, Bermuda, Gibraltar and the Isle of Man have been removed from analysis at request of the PSA. To ensure 2022 findings are comparable with 2021, 2021 analysis has been rerun without Bermuda, Gibraltar and the Isle of Man. As such, this figure differs from that in the 2021 Headline Report/Data Warehouse when 14% of respondents said that how they were treated by their line manager had a negative effect on their morale.

• Intention to Leave

What are your intentions with regard to staying in or leaving the Police Service?	<u>2022</u>	<u>2021</u>
<u>ocivice:</u>		
I intend to stay beyond attaining maximum pensionable service	<u>5%</u>	<u>7%</u>
I intend to stay until I have 30 years' continuous pensionable service	<u>46%</u>	41%
l intend to retire before 30 years' service at 50 years of age with 25 years' service	3%	<u>5%</u>
l intend to retire at 55 years of age which is the earliest point at which I can claim my 1987 and CARE pension	28%	<u>27%³⁰</u>
I intend to retire at 60 years of age which is the earliest point at which I can claim my 1987 and CARE pension without any reduction in my CARE pension	<u>3%</u>	<u>5%</u>
I am intending to leave before being able to claim my pension, but do not intend to leave yet	2%	<u>3%</u>
I am intending to leave before being able to claim my pension, and will leave as soon as I can	1%	1%
I don't know	11%	11%

-

³⁰ Please note - the 2021 PSA/SANI Pay Survey findings included all forces, whereas this year, Bermuda, Gibraltar and the Isle of Man have been removed from analysis at request of the PSA. To ensure 2022 findings are comparable with 2021, 2021 analysis has been rerun without Bermuda, Gibraltar and the Isle of Man. As such, this figure differs from that in the 2021 Headline Report/Data Warehouse when 28% of respondents said that they intend to retire at 55 years of age which is the earliest point at which I can claim my 1987 and CARE pension.

You say that you plan to leave the Police Service	2022		2021			
before being able to claim your pension. To what extent have the following factors affected your intention to leave?	No effect	Some effect	A major effect	No effect	Some effect	A major effect
Will have reached full pension age	<u>69%</u>	<u>16%</u>	<u>16%</u>	<u>73%</u>	<u>21%</u>	<u>6%</u>
The impact of your job on your family and personal life	<u>6%</u>	<u>28%</u>	<u>66%</u>	<u>6%</u>	<u>24%</u>	<u>71%</u>
Your morale	<u>9%</u>	44%	<u>47%</u>	<u>6%</u>	<u>24%</u>	<u>71%</u>
Opportunities for development and promotion	34%	34%	<u>31%</u>	<u>26%</u>	38%	<u>35%</u>
Your pay and benefits	<u>6%</u>	<u>34%</u>	<u>59%</u>	<u>6%</u>	<u>41%</u>	<u>53%</u>
Your pension	<u>19%</u>	<u>16%</u>	<u>66%</u>	<u>12%</u>	<u>29%</u>	<u>59%</u>
Uncertainty regarding your pension	22%	<u>19%</u>	<u>59%</u>	<u>12%</u>	24%	<u>65%</u>
Better job opportunities outside the Police Service	<u>13%</u>	<u>25%</u>	<u>63%</u>	9%	<u>35%</u>	<u>56%</u>
The impact of your job on your health and wellbeing	3%	34%	<u>63%</u>	<u>12%</u>	24%	<u>65%</u>
Your relationship with your colleagues	<u>50%</u>	<u>41%</u>	<u>9%</u>	<u>65%</u>	24%	<u>12%</u>
Dissatisfaction with your day-to-day job role	<u>38%</u>	<u>50%</u>	<u>13%</u>	<u>29%</u>	44%	<u>26%</u>
Your workload and responsibilities	<u>22%</u>	<u>47%</u>	<u>31%</u>	<u>15%</u>	<u>38%</u>	<u>47%</u>
How the Police are treated by the public	44%	34%	22%	<u>35%</u>	<u>41%</u>	<u>24%</u>
How the Police are treated by the government	<u>13%</u>	<u>31%</u>	<u>56%</u>	<u>12%</u>	<u>21%</u>	<u>67%</u>
How you are treated by your line manager	<u>63%</u>	28%	<u>9%</u>	<u>68%</u>	<u>18%</u>	<u>15%</u>
How you are treated by Chief Officers	44%	<u>31%</u>	<u>25%</u>	<u>29%</u>	<u>35%</u>	<u>35%</u>
Personal reasons not linked to the Police Service or your role	<u>59%</u>	<u>28%</u>	13%	<u>63%</u>	<u>25%</u>	<u>13%</u>

How have your intentions with regard to staying in or leaving the Police Service changed in the last 12 months?	2022	<u>2021</u>
I am now more inclined to stay in the service	4%	<u>6%</u>
My intentions have not changed	46%	<u>51%</u>
I am now more inclined to leave the service	50%	43%

• On-call duties

Do you perform an 'on call' function outside of your core hours of duty?	2022	<u>2021</u>
Yes	93%	91%
<u>No</u>	<u>7%</u>	9%

Are you receiving on-call allowance for the on-call duties that you undertake?	2022	<u>2021</u>
Yes	94%	91%
<u>No</u>	<u>5%</u>	8%
I don't know	1%	2%

• Temporary promotion and pay scales

I am on temporary promotion	2022	<u>2021</u>
Superintendents	14%	<u>17%</u>
Chief Superintends	24%	24%

What is your current salary (Superintendents)	2022	<u>2021</u>
Pay Point 1 ³¹	29%	30%
Pay Point 2 ³²	24%	18%
Pay Point 3 ³³	14%	<u>15%</u>
Pay Point 4 ³⁴	30%	<u>35%</u>
I don't know	2%	1%
I prefer not to say	<1%	<u><1%</u>

What is your current salary (Chief Superintendents)	2022	2021
Pay Point ³⁵	33%	30%
Pay Point ³⁶	<u>25%</u>	27%
Pay Point 3 ³⁷	40%	41%
I don't know	2%	2%
I prefer not to say	0%	<1%

 $^{^{31}}$ 2021 = £70,173 and 2022 = £72,075

³² 2021 = £73,833 and 2022 = £75,735

 $^{^{33}}$ 2021 = £77,691 and 2022 = £79,593

 $^{^{34}}$ 2021 = £82,881 and 2022 = £84,783

^{35 2021 = £86,970} and 2022 = £88,872

 $^{^{36}}$ 2021 = £89,910 and 2022 = £91,812 37 2021 = £91,749 and 2022 = £93,651

Engagement

Please rate the extent to	2022		2021			
which you agree or disagree with the following:	<u>Disagree</u>	Neither agree nor disagree	<u>Agree</u>	<u>Disagree</u>	Neither agree nor disagree	<u>Agree</u>
I feel proud to be in the Police Service	<u>9%</u>	<u>9%</u>	<u>82%</u>	<u>7%</u>	<u>8%</u>	<u>85%</u>
I feel valued in the Police Service	38%	23%	39%	37%	22%	41%
I would recommend joining the Police Service to others	<u>45%</u>	20%	36%	37%	25%	38%38
I feel a strong personal attachment to the Police Service	10%	<u>12%</u>	<u>78%</u>	<u>11%</u>	<u>9%</u>	<u>79%</u>
I feel that members of the Police Service are respected by the public ³⁹	<u>58%</u>	23%	<u>19%</u>	=	=	=
I feel that members of the Police Service are respected by the government ⁴⁰	91%	<u>7%</u>	<u>1%</u>	Ξ	=	п

Compared with 12 months ago, how valued do you feel for the work that you do?	2022	<u>2021</u>
Less	<u>53%</u>	44%
About the same	40%	<u>47%</u>
More	6%	10%

How would you describe your current level of personal motivation?	<u>2022</u>	<u>2021</u>
Low	22%	<u>17%</u>
Neither high nor low	26%	26%

³⁸ Please note - the 2021 PSA/SANI Pay Survey findings included all forces, whereas this year, Bermuda, Gibraltar and the Isle of Man have been removed from analysis at request of the PSA. To ensure 2022 findings are comparable with 2021, 2021 analysis has been rerun without Bermuda, Gibraltar and the Isle of Man. As such, this figure differs from that in the 2021 Headline Report/Data Warehouse when 39% of respondents said that they would recommend joining the Police Service to others.

 $^{^{39}}$ Please note – there is no comparable data from 2021 as this response option is new for the 2022 survey.

⁴⁰ Ibid

<u>High</u> <u>52%</u>

How does your level of personal motivation compare with 12 months ago?	2022	<u>2021</u>
Lower	43%	<u>35%</u>
About the same	<u>51%</u>	<u>57%</u>
<u>Higher</u>	<u>5%</u>	<u>8%</u>

9. Appendices

Appendix 1

Joint statement on police officer pay

There has been significant welcomed investment by government since August 2019 in building back the police officer workforce capacity through the uplift of 20,000 officers.

The service is committed to maintaining the Uplift going forward however we risk losing the potential rewards of this investment if we do not recognise the unique nature of policing duties and reward to the level that allows a good standard of living.

Policing is on track to meet the growth to 148,433⁴¹ officers by 31st March 2023, and has recruited its most diverse workforce. This positive progress will continue. Communities, policing and government have a shared interest in maximising and retaining this investment, maintaining this growth to meet the current policing challenge, ensuring high professional standards and rebuilding public confidence.

By comparison to other public and private sector organisations, policing has traditionally had high levels of retention. Turnover, excluding retirements, tends to be focused in the early years. Given the large number of new officers, over the next 5 years policing is likely to experience greater turnover, given currently a third of officers have less than 5 years' experience. Attrition is therefore nationally likely to rise in year to 8% before falling by the end of 2024/5 but still above pre-Uplift levels. There will therefore need to be ongoing investment in recruitment and in early-years retention, but this must not be at the detriment of other ranks, as policing needs to retain experience at all levels.

Policing is not alone across the public services in raising their concerns of the cumulative impact of previous pay awards and consequential real terms pay cuts. Therefore, the unique combination of the:

- physical and mental risks associated with carrying out this confrontational and stressful role;
- expectation of the highest personal and professional standards:
- inability to withhold labour;
- positive contribution policing makes to public services;
- restrictions placed on officers' personal lives, should be acknowledged by the Police Remuneration Review Body (PRRB) in making their recommendations to Government that officers are entitled to a pay premium.

Over the last 13 years, 9 years have witnessed real terms pay cuts (pay award versus September inflation), with the last 2 years accelerating this long term trend. In 2010 an officer's starting salary was approximately £23,300. At present it is approximately £26,700 at pay point one. If inflation were applied to the starting salary in 2010 an officer today would start on over £33,000. The same principle applies

-

 $^{^{41}}$ Based on headcount for calculation see Home Office Uplift statistics. Excludes BTP.

across all ranks. Between 2010 and 2022, **real terms pay of officers has reduced by almost 17%.**

This has eroded the pay premium which is designed to compensate for the unique nature of policing. Incremental drift and promotion only partly offset this detriment and should not be seen as an additionality to pay rates as they reflect increased responsibility and accountability, therefore any pay award should be applied as a common percentage increase across all ranks within policing.

Approximately 80% of police budgets are spent on police officers' and staff remuneration. The provisional grant settlement and precept flexibility for 2023/24 has been fixed and within this the government have allowed for an annual pay increase of 2%, whilst inflation is predicted to be significantly above this during 2023. The clear and present risks of an unfunded pay award are cuts to police staff, delays to recruitment and reduced levels of asset investment. The cumulative impact of this will be a reduction in the totality of policing and less support for officers which undermines attraction and retention and makes their job more difficult.

The impact of investment in policing within the current CSR, not just for Uplift, but also in other areas is starting to show tangible results. This upward trajectory cannot be allowed to stall due to an increase in the attrition rate or a failure to retain the best. Both of these issues represent a real risk unless pay remains competitive not just within the public sector but also when compared to the private sector in what will continue to be a tight labour market. Talent will always attract a premium and the service remains committed in its ability to deliver positive outcomes within the National Beating Crime Plan and local Police and Crime Plans, but this can only be delivered through an effective pay and reward process. This pay submission is the first stage in the development of a more formal pay and reward strategy and sets out a strong evidence base for an increased pay rise whilst accepting the importance of affordability.

We would ask the PRRB to make the appropriate recommendations on police pay to the Secretary of State and Prime Minister which take full account of the current and future economic conditions and are fully funded.

14th February 2023

Martin Hewitt
Chief Constable

Chair of NPCC

Gavin Stephens

Chief Constable, Surrey Police

Chair of NPCC Finance Committee Jen Jon

Jeremy Vaughan

Chief Constable, South Wales Police

Lead for NPCC Pay and Conditions P.C. Kelly

Pam Kelly

Chief Constable, Gwent Police

Chair of NPCC Workforce Committee

Appendix 2



BY EMAIL ONLY

Paul Griffiths
Police Superintendents' Association Ltd 67a Reading Road
Pangbourne
Berkshire RG8 7JD

Dear Paul,

Re: Police superintendent numbers across the country

31 August 2021

Thank you for your letter dated 5 July regarding police superintendent numbers across England and Wales. It was useful to discuss your concerns about the growth in the proportion of superintendent officers.

I appreciate your continued commitment to supporting your members by requesting interventions to increase the number of superintendents. However, you'll be aware that it is up to operationally independent chief constables and democratically accountable Police and Crime Commissioners to determine how officers are best deployed within each force. Whilst we are able to support policing to increase recruitment at entry level, chief constables in each force are best placed to make decisions about appropriate supervisory ratios at higher ranks based on their local knowledge. You state in your letter that the Treasury bid to support the uplift included specific funding to increase the number of superintendents by 350. Whilst this was the subject of very early discussions with NPCC around a range of assumptions on additional support that may be required by forces, the bid did not include specific numbers of supervisory ranks in order to enable Chiefs to make those local decisions. This Government has provided a total police funding settlement of up to £15.8 billion in 2021/22 to support them in making these choices.

Nevertheless, the results of your consultation exercise with members on their working hours and personal resilience have been taken very seriously. I recognise that demand for the police service is changing and there are challenges faced by your colleagues day in and day out. I expect chief constables to take all proportionate steps to meet their obligations towards officers, including on working time, to ensure officers can take the rest days they are entitled to. In addition, I want chief officers to effectively support the wellbeing of all officers and staff which is why we have continued to invest in the National Police Wellbeing Service, providing £3 million to the service for 2021/22.

You'll know that I am committed to ensuring the service is supported to manage the increase in the number of police officers from the uplift. It is vital that as part of this

Government's commitment to increase the number of police officers by 20,000, that forces can also grow well across all ranks. Strong leadership and a consistent standard of good line management are crucial in ensuring the success of the uplift. That is why I have provided the College of Policing with over £1 million to develop a National Leadership Centre to set clear standards for all forces. Work has begun with the creation of pilot standards and this will lead to a new national leadership development framework for all ranks, including superintendents. In addition, the College will plan and design a new Fast Track Inspector to Superintendent programme this year to further develop the talent within this rank of future chief officers.

Thank you for taking the time to write to me about your concerns.

Rt Hon Priti Patel MP

Appendix 3

CAR ALLOWANCES

2010 REPORT OF THE TECHNICAL ADVISERS

1 Introduction

This is the report of the Technical Advisers following their review of the costs of motoring in relation to the agreed formula.

2 The Standard Car

The vehicles chosen are set out in Appendix 1. It should be noted that cars have been chosen from the list of best selling cars where possible, with the exception noted below.

Group One cars comprise only 3.41% of the total market at 68,098 units. This is still a small proportion of the cars sold but has increased by 140% since last year. We have been able to select four cars for Group One, but as in recent years not all from the top twenty sellers. Only one of the vehicles is in the top twenty selling cars for 2009.

Group Two cars represent 37.2% of the total market with 742,153 units sold, this is an increase of 4.1% compared to 2008 in a reduced market, and this sector maintains its position as the most popular vehicle group in the UK market.

Group Three cars represent 26.61% of the total market with 530,849 sales, this is a decrease of 14.22% compared to 2008, although this sector still represents the second largest proportion of new cars sold in the UK by a significant margin.

Groups Two and Three continue to represent the bulk of vehicles sold in the UK at about 63.8% of the total although the total size of the new car market shrank by 6.4% compared to 2008. Whilst the percentage of private purchases has increased to 53.9% of the new car market, this is somewhat misleading as the taxation regime for company car users has resulted in many new "company cars" being treated as private purchases and the Government Scrappage Scheme resulted in approximately 280,000 new car sales to private buyers.

The private purchases, however, tend to mirror the vehicle types purchased by the fleet sector, and this would confirm that the top twenty selling vehicles still have a great relevance for the "local government" market.

As we predicted in recent years, the consistent drive by manufacturers to meet the increasing EU emissions regulations means that engine sizes are increasing and it will therefore become difficult to deal with both Groups One and Two in future years. (See future developments, paragraph 13 below).

The increase in engine size means that vehicles move between Groups making year on year comparisons more difficult.

Sales of diesel vehicles did not follow recent trends and reduced to a market share of 41.7% or 832,456 units. Motor Industry analysts predict market share to be

sustained although at a reduced rate of increase due to the differential pricing of diesel and petrol. Although the majority of new sales are made to businesses in Vehicle Groups Three and above, significant increases in sales will result in substantial numbers appearing on the second hand market and being purchased by public sector employees.

Registrations of alternatively fuelled vehicles were reduced by 5.5% in 2009 to 14,963. This represents 0.8% of the total market for new cars.

3 Purchase and Selling Prices

The figures are set out in Appendix 2. The difference between the average purchase price and the average selling price (after five years, or 50,000 miles) is divided by 5 to give an annual depreciation.

4 Fuel Consumption

The data is set out in Appendix 3. The following rates result:

<u>Band</u>	Miles Per Gallon	
451 - 999cc	54	(previous – 53)
1000 - 1199cc	49	(previous – 48)
1200 - 1450cc	45	(previous - 44)

The five years of figures which are taken into account to determine the average of fuel consumption for each group, are derived entirely from the Official Fuel Consumption Test, based on EU Directive 1999/100/EC, which itself is based on the EU Directive 1993/116/EC. This Official Fuel Consumption Test is deemed to provide consumption figures that are more representative of "real world" motoring. Details of its basis are shown at Appendix 3.

The Miles per Gallon in all Groups has increased as a result of the greater efficiency of cars in the Group over the last five years as reflected in the moving averages.

5 Fuel Price

The petrol element is based on unleaded fuel at 111.74 per litre (507.95 per gallon) and using the fuel consumption figures would produce costs per mile as follows:-

<u>Band</u>	Cost Per Mile (p)	
451 - 999cc 1000 - 1199cc	9.406 10.366	(previous -7.433p) (previous -8.207p)
1200 - 1450cc	11.288	(previous –8.953p)

Averages are based on actual pump prices in the first two weeks of January 2010 as surveyed by the Automobile Association on behalf of the Society of Motor Manufacturers and Traders.

Following the turbulence of 2007 and the first half of 2008, fuel prices started to soften immediately after the completion of the Olympic Games in China, and with economic recession gripping North America, the biggest consumer of oil products, prices fell to their lowest level for 21 months by the end of December 2008. Since that date however, fuel prices have been subject to steady increases.

Although the OPEC Nations have tried to agree to a reduction in production of oil, unwillingness from the Russian Oil producers has limited the effectiveness of this. Oil Industry Analysts do not expect significant changes in oil prices during the current economic downturn.

The Chancellor has reinstated the 2.5% VAT reduction as from 1 January 2010. The Petrol Retailers Association believes that fuel could be faced with increases in duty during 2010.

6 Tyres

Prices have increased by an average of 8.00% across the range of standard fitment tyres, lower than last year's increase of 15%. This is the seventh year in which tyre costs have increased. The basis of the formula in historic costing could however be reviewed. (See paragraph 13, below.)

	Percentage Increase	<u>Previous</u> <u>Base</u>	Present Cost
<u>Band</u>	%	Р	Р
451 – 999cc	8%	1.068	1.153
1000 - 1199cc	8%	1.268	1.369
1200 - 1450cc	8%	1.432	1.547

7 Servicing, Repairs, Renewals and Oils

The same methodology has been used as for previous years i.e. the average cost per mile for each Group is determined for 2009 and then brought into a 5 year rolling average, with earlier years repriced using the relevant retail price index.

<u>Band</u>	Pence Per mile	
451 - 999cc	3.143	(previous – 3.215p)
1000 – 1199cc	2.702	(previous - 2.768p)
1200 – 1450cc	3.591	(previous – 3.839p)

The background data is set out in Appendix 4.

This area remains difficult to deal with, and new models coming on to the market have longer service intervals and reduced servicing costs. New vehicles introduced into Groups One Two and Three for 2010 have reduced the average service costs of those groups

Although manufacturers continue to increase the interval between services on a mileage basis, a feature of the newest models introduced is a computerised access to engine management systems which allows faults to be called up electronically, and as a consequence servicing time and costs are being reduced further.

The increase in servicing prices, as measured by the Retail Price Index (RPI), tend to be offset by reducing real costs over the five years used in the moving average adopted in the formula.

8 Insurances

The agreed approach to calculating insurance costs has been to uprate the previous year's figures by the relevant element of the RPI (note reference tp future developments on items based on historic costing in paragraph 13). The insurance element has increased from 446.8 to 512.4 over the last year, which is an increase of 14.7%. Applying this percentage to the previous amounts gives the following:

<u>Band</u>	<u>£</u>	
451 - 999cc 1100 - 1199cc	1,553 1,672	(Previous 1,354) (Previous 1,458)
1200 - 1450cc	1,995	(Previous 1,739)

9 Depreciation

Until the introduction of the Government Scrappage Scheme in July, new car sales had fallen for fifteen consecutive months. Prior to the introduction of the Scheme new car sales in 2009 were 26% lower than the corresponding period for 2008 whilst after the Scheme's introduction, sales increased by some 21% compared to the same period in 2008.

The stability of new car prices has continued to hold, with many new car prices remaining around their 2001/2002 level, although there are signs that this may change in 2010 as Ford have announced significant increases across their range. Previous stability has been achieved in the main by reduced specifications and lower dealer margins as a consequence of the move to parallel imports in the late 1990's. The current policy for the pricing of new cars continues to depress the residual values of second hand vehicles

Depreciation is also, however, affected when cars become obsolete. When new models are introduced into groups the depreciation of the five year old and obsolete design can increase significantly. During 2009 new models of the Citroen C1, Ford Fiesta, VW Golf, VW Polo and Peugeot 308 were introduced

Motor Industry sources are predicting a number of new cars from seven major companies are to be introduced during 2010 in Groups Two and Three. If these vehicles become top sellers, as we anticipate some of them will become, this could have a major impact on the residual values of the obsolete models.

Having said that the major impact on the residual values of second hand cars at the time of this report is the economic downturn, which has had a significant effect upon consumer confidence and resulted in a sharp downward trend in second hand values. Trends are very difficult to predict but from a low point in January 2009 second hand car values increased as the number of vehicles coming on to the market reduced, and then after July when the Scrappage Scheme was launched second-hand values once again decreased as people who may have been in the market for a second hand vehicle were instead able to trade up to a new but smaller car.

The sales of Group One cars, at 3.4% of the total market, are not represented by the volume sellers during 2009 and this figure has been increased on a one-off basis by the Scrappage Scheme. The continued trend of manufacturers to fit slightly larger engines to vehicles in order to meet EU requirements is likely to prevent large sales within this sector. The predicted uptake of alternately fuelled vehicles has not taken place and it remains to be seen whether new vehicles from Honda and Toyota can make inroads into the market place as anything but niche players.

The use of the figures of purchase and resale prices set out in Appendix 2 gives the following figures:

<u>Band</u>	<u>Depreciation</u>		<u>Percentage</u> Change
	£		<u>onange</u> %
451 - 999cc	1,206	(previous - £1,247)	-3.2
1000 - 1199cc	1,431	(previous - £1,372)	4.3
1200 - 1450cc	2,032	(previous - £2.058)	-1.3
	4,669	(previous - £4,677)	-0.2

The calculations produce variations in the level of depreciation from 2009 i.e. a reduction of 3.2% for Band 1, plus 4.3% for Band 2 and minus 1.3% for Band 3. The formula is based on real historical depreciation figures, whereas all other motoring organisations base their calculations on predicted future depreciation estimates. To smooth out variations from year to year, in previous reviews, an average depreciation percentage has been applied across all three groups.

Your advisers remain concerned at potential variations arising between bands for reasons set out in the report. It is therefore recommended that previous practise is continued and the band results be aggregated. This would give a reduction in depreciation of 0.17% which, if applied to the bands, would give:

	2009 £				2010 £
Band 1 Band 2 Band 3	1,219 1,439 2,020)) _)	Χ	0.9983.	1,217 1,437 2,017
	4,678	_			4,671

10 Vehicle Excise Duty

The formula assumes local government officers drive cars up to five years old. From 2006 therefore, the duties payable on cars registered before 1 March 2001 are not relevant to the calculation.

The Chancellor in his Pre-Budget Statement in October 2008 confirmed that the planned reform of Vehicle Excise Duty (VED) had been delayed from 2009 to 2010. The revised proposals are set out below and the information is restricted to that applicable to the Standard Cars that have been selected for 2010.

Vehicles relevant to this report registered after 1.3.2001

Α	Up to 100	-	-
В	101 to 110	35	20
С	111 to 120	35	30
D	121 to 130	120	90
E	131 to 140	120	110
F	141 to 150	125	125
G	151 to 165	150	155

These figures may be varied by the Chancellor's March 2010 Budget Statement

The bandings of the standard cars are shown at Appendix 5. The Group averages are £48 for Group 1; £100 for Group 2 and £120 for Group 3.

The separate duty for alternative fuelled cars and diesel cars, are ignored for the purpose of this review, although the revised bandings in 2006 and 2007 were introduced to encourage the use of alternative fuelled vehicles as well as discourage the use of vehicles with higher exhaust pollutions.

11 Environmental Issues Impact

Average new car CO₂ emissions showed their fastest rate of decline in 2009 with a 5.4% reduction to 149.5g/km. This was assisted by the Scrappage Scheme with the average CO₂ value of vehicles through this scheme being 133.3g/km.

The market bore witness to a number of new low CO₂ emitting models with manufacturers offering eco versions of many of their mainstream models.

The shift to diesel and alternatively fuelled cars was not sustained in 2009 but this is thought to be as a consequence of the Scrappage Scheme rather than a long term trend.

At the end of 2007 the EU published the Directive detailing European—wide mandatory emissions targets for new cars to achieve 130g/km by 2012. The Directive also indicated the very high fees for non-compliance with the targets.

In the UK, to achieve the targets by 2012, will require a reduction of some 10.0g/km reduction a year over the next two years.

12 Summary

The above items are summarised in Appendix 6 together with the formula based allowances that would result.

13 Future Developments

The major areas for review have not changed for a number of years and include:

- As manufacturers strive to meet ever tightening emission regulations, new engines with slightly larger capacities are being introduced, generally around 1250cc. This has the effect of moving Group Two cars into Group Three and leads to distortions of operating costs and residual values. A good example of this is the Ford Fiesta which, although being in Group 3 for engine capacity, has the size and running costs of a typical Group Two car. The capacity classes for Groups Two and Three should be the subject of a review.
- The number of diesel-engined cars being sold has reached a significant level and is expected to reach in excess of 42% in 2010. The average diesel engined vehicle is generally more fuel efficient than its petrol powered counterpart, and as an example the best selling diesel engined car, the Ford Focus has a fuel cost per mile of 8.23 pence, compared to a fuel cost per mile of 11.66 pence for the petrol engined equivalent. The cost of operating diesel engined vehicles should be researched for possible factoring into future reviews.
 - The formula used has a number of areas based on historic costing, an example of this is the element for tyres which updates previous year figures for inflation but does not take account of technical or other changes that have increased the service life of tyres in recent years. This could reduce the cost element of tyres per mile by up to 50%. The formula in respect of issues of this nature should be reviewed.

K Dixon and P Gregory, Technical Advisers March 2010

STANDARD CAR ANALYSIS

1 SMMT - Top Twenty Sellers 2009

V/W Golf BMW 3 Series Peugeot 308 Ford Fiesta BMW Mini Toyota Yaris Honda Jazz Vauxhall Astra Nissan Qashqai Audi A3 Ford Mondeo BMW 1 Series Honda Civic Vauxhall Corsa Ford Focus Peugeot 207 V/W Passat Vauxhall Insignia Renault Clio V/W Polo

2 Standard Cars Related to Bands

451 - 999cc (3/5 door)

Citroen C1 VT (3); Vauxhall Agila 1.0i 12v ecoFLEX (5); Toyota Yaris 1.0VVT-i T2 (3); Chevrolet Matiz 1.0SE (5).

1000 - 1199cc (3/5 door)

Volkswagen Polo 1.2 60 Moda; Honda Jazz 1.2SE (5); Renault Clio 1.2 Expression (5); Vauxhall Corsa 1.2 16v Life (3).

1200 - 1450cc (5 door)

Ford Focus 1.4 Studio; Volkswagen Golf 1.4 80 S, Vauxhall Astra 1.4 100 Exclusive; Ford Fiesta 1.25i 82 Edge.

Note: The Nissan Micra has been replaced by the Honda Jazz in Group 2. Apart from minor model changes the remaining standard cars remain unchanged from last year.

PURCHASE PRICE AND RESIDUAL VALUE (RESALE VALUE) JANUARY 2010

Average Sell Price 5 Year 50,000 Miles £ 3,230 2,143 2,280 3,215 2,717 3,408 3,860	÷ 5
£ 3,230 2,143 2,280 3,215 2,717	£
£ 3,230 2,143 2,280 3,215 2,717	£
2,143 2,280 3,215 2,717	1,206
2,143 2,280 3,215 2,717	1,206
2,143 2,280 3,215 2,717	1,206
2,280 3,215 2,717 3,408	1,206
3,215 2,717 3,408	1,206
2,717 3,408	1,206
3,408	1,206
3,860	
2,920	
3,119	
3,327	1,431
3,321	1,431
3,873	
6,113	
3 388	
0,000	
)	6,113 3,388

FUEL CONSUMPTION ANALYSIS

Weighted Average	Band 1	Miles Per Gallon Band 2 1000cc to 1199cc	Band 3
(EC116-93)	450 to 999cc		1200cc to 1450cc
Five Year Average	Band 1	Band 2	Band 3
2010	56.55	50.33	46.98
2009	55.15	48.30	44.53
2008	53.20	48.30	44.30
2007	53.20	47.90	43.63
2006	53.20	49.25	43.40
Average	54.26	48.82	44.57

Weighted Average for the Official Fuel Consumption Test

Urban Cycle: From a cold start, the cycle consists of a series of accelerations, steady speeds, decelerations and idling, maximum speed 31 mph, average 12 mph and distance 2.5 miles.

Extra Urban Cycle: This follows the urban cycle and consists of half steady speed driving, and the remainder accelerations, decelerations and some idling. Maximum speed is 75mph, average 39 mph and distance 4.3 miles.

Combined Fuel Consumption: This figure is a weighted average of the two cycles, 48% for Urban Cycle and 52% for Extra Urban and has now been used for all calculations.

SERVICE, REPAIRS, RENEWALS, AND OILS ANALYSIS (pence per mile)

2010 Costs

Car Type	Source Fleet Management Services P
Band 1 : 451-999cc	2.663
Average Band 1	2.003
Band 2 : 1000cc - 1199cc	
Average Band 2	2.330
Band 3 : 1200cc to 1450cc	
Average Band 3	2.753

Five Year Moving Average

	Band 1		Band 2		Band 3	
	Oct 2008 Cost	Repriced	Oct 2008 cost	Repriced	Oct 2008 Cost	Repriced
	р	р	р	р	р	р
2010 2009 2008 2007 2006	2.745 3.342 3.222 3.354	2.663 2.830 3.445 3.321 3.458	2.573 2.668 2.749 2.855	2.330 2.652 2.750 2.834 2.943	3.108 3.783 3.806 4.050	2.753 3.204 3.900 3.924 4.175
5 year		15.717 ÷5		13.509 ÷5		17.956 ÷5
average		3.143	1	2.702	-	3.591

<u>Note</u>

The repricing is achieved by applying the maintenance of motor vehicles index within the Motoring Expenditure element of the Index of Retail Prices. There is no completely accurate index that would reflect these costs but the RPI is generally understood.

2009	(Oct)	343.9
2008	(Oct)	333.6

VEHICLE EXCISE DUTY

	Excise Band	Duty £	<u>Average</u> £
Band 1			
Chevrolet Matiz Vauxhall Agila Citroen C1 Toyota Yaris	E C B C	110 30 20 30	48
Band 2			
Honda Jazz Renault Clio Vauxhall Corsa V/W Polo	D E E D	90 110 110 90	100
Band 3			
Ford Fiesta Ford Focus Vauxhall Astra V/W Golf	E G D F	110 155 90 125	120

MOTOR CAR ALLOWANCES

	451 -	1000 -	1200 -
	999cc	1199cc	1450cc
	£	£	£
Standing Charges (per annum)			
Depreciation	1,217	1,437	2,017
Tax	48	100	120
Insurance	1,553	1,672	1,995
	2,818	3,209	4,132
Lump sum allowance for essential users based on 30% of standing charges (rounded to nearest multiple of £3)	£846	£963	£1,239
Remainder of standing charge to be paid at a mileage rate over 8,500 miles	23.200p	26.424p	34.035p
Running Expenses (per mile)	Р	Р	Р
Petrol (unleaded) – 111.74p per litre Tyres	9.406 1.153	10.366 1.369	11.288 1.547
Servicing, repairs, renewals, oil	3.143	2.702	3.591
	13.702	14.437	16.426
Allowances			
Essential Users			
Lump sum per annum	£846	£963	£1,239
Per mile first 8,500 miles	36.9p	40.9p	50.5p
Per mile - after 8,500 miles	13.7p	14.4p	16.4p
Casual Users			
Per mile first 8,500 miles	46.9p	52.2p	65.0p
Per mile - after 8,500 miles	13.7p	14.4p	16.4p