Police Superintendents’ Association
of England and Wales

The Superintendents’ Association
of Northern Ireland

Joint Submission to the
Police Remuneration Review Body
Submission to the Police Remuneration Review Body

January 2016
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1. Introduction

1.1.1 This is a joint submission to the Police Remuneration Review Body (PRRB) by the Police Superintendents’ Association of England and Wales (PSAEW) and the Police Superintendents’ Association of Northern Ireland (SANI).

1.1.2 The PSAEW represents approximately 1,225 Superintendents and Chief Superintendents across 46 police forces throughout England and Wales. 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 protectorate of the Isle of Man. SANI represents 64 members in Northern Ireland. 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.

1.1.3 This submission made on behalf of the PSAEW and PSANI should be read in conjunction with submissions made jointly by the PSAEW and the Police Federation of England and Wales (PFEW); and between SANI and the Police Federation of Northern Ireland (PFNI).
2. The Remit Letters

2.1 England and Wales

2.1.1 The remit letter for England and Wales was issued by the Home Secretary on 9th November 2015 and requested that the PRRB make recommendations in respect of the following matters:

1. How to apply the pay award for 2016-17, in accordance with CST’s letter, including the consideration of parties’ evidence on the targeting of particular groups;
2. Whether any adjustments should be made to London and South East allowances in light of further evidence put forward by employers;
3. To be included as part of your rolling review of payments and allowances:
   a. Overtime rates for bank holiday working;
   b. Motor vehicle allowance rates; and
   c. The Away from Home Allowance.

2.2 Northern Ireland

2.2.1 The remit letter for Northern Ireland was issued by the Justice Minister on 20th October 2015 and requested that the PRRB make recommendations in respect of the following matters:

1. The application of any pay award for these police officers, effective from 1 September 2016;
2. Whether any increase should be applied to the Northern Ireland Transitional Allowance and whether to change its current non-pensionable status;
3. Whether any increase should be applied to the Competence Related Threshold Payment and/or Dog Handler’s Allowance;
4. The operation of current on call arrangements for the Federated and Superintending ranks – including compensation levels and accessibility by those ranks.

2.2.2 In addition to the specific areas for recommendation by the PRRB, both letters referred to correspondence sent by the Chief Secretary of the Treasury to chairs of pay review bodies (dated 19th August 2015) in relation to the need for continued pay restraint; as well as the work being undertaken by the College of Policing and the recommendations arising from the Review of Police Leadership. The remit letter in respect of Northern Ireland also made reference to the need to consider any specific challenges facing police officers in Northern Ireland, which are not already addressed; and the desirability of continuing to prevent the creation of barriers to movement between forces.
3. PSAEW and SANI submissions in respect of those matters contained within the Remit Letters

3.1 PSAEW

3.1.1 The PSAEW’s submission in respect of the following areas for recommendation by the PRRB is as follows:

Pay Award 2016 – the position is identical to that of the PFEW and evidence is contained within the joint submission.

London and South East Allowances – the position is identical to that of the PFEW and evidence is contained within the joint submission.

Review of Motor Vehicle Allowances - the position is identical to that of the PFEW and evidence is contained within the joint submission. However, a survey conducted of members of the PSAEW in December 2015 revealed the following in respect of 42 forces which is relevant to the submission and which members of the PRRB might find helpful to consider as part of their deliberations:

- Only 10 forces have ‘provided vehicle’ schemes for all members of the Superintending ranks with six forces making such a provision for some its Superintending ranks.
- In 39 forces, members of the Superintending ranks reported needing to routinely have access to either their own vehicle or one provided by the force in order to carry out their duties (primary role and whilst ‘on call’)
- In 33 forces, members of the Superintending ranks reported there being an expectation by their force that they would have access to, and use, their own vehicles in the course of their duties (primary role and whilst ‘on call’)
- In 8 forces, members of the Superintending ranks reported that their force reimbursed mileage other than at Essential, Casual or HMRC rate

3.1.2 The following areas for recommendation by the PRRB currently have no locus for members of the Superintending ranks:

Overtime rates for bank holiday working, and
The Away from Home Allowance

3.1.3 Any submission made by the PSAEW in respect of these two matters would be from the perspective of senior managers within policing, rather than as a membership organisation.
3.2 SANI

3.2.1 SANI’s submission in respect of the following areas for recommendation by the PRRB is as follows:

**Pay Award 2016** - the position is identical to that of the PFNI and evidence is contained within the joint submission.

**Northern Ireland Transitional Allowance and its non-pensionable status** - the position is identical to that of the PFNI and evidence is contained within the joint submission.

3.2.2 The following area for recommendation by the PRRB currently has no locus for members of the Superintending ranks:

**Competence Related Threshold Payment and/or Dog Handler’s Allowance;**

3.2.3 Any submission made by SANI in respect of these two matters would be from the perspective of senior managers within policing, rather than as a membership organisation.

In respect of the following area for recommendation by the PRRB:

**On Call Arrangements – access to and compensation level**

3.2.4 The following submission is made:

3.2.5 The Personal Resilience Survey (PRS) of members of SANI, which is commented upon elsewhere within this submission, illustrates clearly the impact of the pressures felt by its members upon their health. However, the issue of ‘on call’ is of particular concern and forms part of the basis for the request by SANI that consideration is given to the provision of an ‘on call’ allowance for Superintending ranks in the unique circumstances pertaining to Northern Ireland.

3.2.6 At present an ‘on call’ allowance is paid to members of the Federated, but not the Superintending, ranks within Northern Ireland. Whilst this may reflect pay realities it is, SANI would submit, invidious that the same function, for example that of an ‘on call’ Tactical Firearms Commander, is recognised by the payment of an allowance for officers below the rank of Superintendent, but not at the rank of Superintendent or above.

3.2.7 Many of the highest risk functions within the PSNI - and cognisance should be taken of the unique environment of high operational threat and accountability in which members of the force operate - will be carried and discharged by members of the Superintending ranks, including ‘on call’ responsibilities. In most cases, the role of Strategic Firearms Command is undertaken by members of the Superintending ranks; and the Authorising Officer function, under the Regulatory and Investigate Powers Act (RIPA), is always undertaken by members of the Superintending ranks.
3.2.8 Whilst some ‘on call’ responsibilities are an inevitable consequence of a particular role undertaken, e.g. where an officer is an ‘Authorising Officer’ on a permanent basis, others are undertaken on a voluntary basis, e.g. that of Firearms Command which is, to a large degree, an additional non-core task.

3.2.9 Undertaking an ‘on call’ function has a significant impact upon officers and their private lives. In short, they must remain able at all times during their period of ‘on call’ to take command of any incident that might occur. This clearly places a foreseeable restriction not only upon officers themselves, but upon family members as well.

3.2.10 The PRS of members of SANI shows that, whilst 67% of respondents reported taking annual leave or rest days to avoid sickness absence, 90% were unable to use all of their Annual Leave in the previous twelve months; and 81% had been unable to take all of their scheduled rest days in the previous month. A total of 35% of members reported having permanently lost rest days in the previous twelve months which they had been unable to take (due to the provisions of Police Regulations).

3.2.11 In numerical terms, in June 2014 a total of 3,060 rest days were owed to members of SANI. A more up to date figure is currently being researched and this will be provided to members of the PPRB at the oral evidence stage, if not sooner, by SANI. On behalf of its membership, SANI is currently working with the PSNI to address this issue through a review of ‘on call’ arrangements. However, a recent survey indicates that the average number of rest days in lieu owed to members of SANI was 45, with the range being between 10 and 160 days owed.

3.2.12 Many, if not all, of the members of SANI seek to amalgamate their ‘on call’ functions already, e.g. being Duty Officer for their district or department whilst performing a wider PACE/firearms command function. The PRS shows that 98% of respondents reported undertaking ‘on call’ responsibilities which on a rest day. This is neither appropriate nor acceptable.

3.2.13 In view of the ‘on call’ demands upon their membership, and the unique operational challenges of policing Northern Ireland, SANI proposes that consideration is be given to the payment of an ‘on call’ allowance of £40.00 per 24 hour period (or fraction thereof).

3.2.14 Such a payment would go some way to compensating officers for the responsibilities carried and the restrictions placed upon them through the performance of such function. This amount is not considered exorbitant, nor massively out of kilter with that which is paid currently to members of the Federated ranks. If ten members of SANI were to be ‘on call’ in any 24 hour period, the annual cost to the PSNI would be in the region of £146,000. This is a relatively small sum when the overall benefit to the organisation is taken into account. As a result of the ongoing review of ‘on call’ arrangements, it is likely that this cost could be reduced.
3.2.15 It is not proposed that such an allowance would be pensionable. SANI accept that it would be appropriate for the allowance to be subject to review given that it reflects the unique operational pressures of policing within Northern Ireland. Thus, should the security situation normalise, the allowance may be discontinued as part of the review arrangements of allowances undertaken by the PRRB.
4. PSAEW and SANI submissions in respect of additional matters not contained within the Remit Letters

4.1.1 Although SANI had the opportunity to contribute to those matters contained within the remit letter for Northern Ireland, no such opportunity to contribute to the remit letter for England and Wales was afforded to the PSAEW.

4.1.2 In addition to those matters referred for recommendation by the PRRB, the PSAEW and SANI would wish the PRRB to consider submissions in the following two areas:

1. The appropriateness of the current pay mechanism for members of the Superintending ranks and the proposed provision of a non-pensionable allowance.

4.2 The appropriateness of the current pay mechanism for members of the Superintending ranks and the proposed provision of a non-pensionable allowance

4.2.1 Members of the PRRB will be aware that the PSAEW has, for some time, been questioning whether a remuneration mechanism for its members whereby pay is determined only by rank and the length of time served in that rank, remains be fit for purpose. This is due primarily, but not exclusively, to austerity measures introduced during the last Comprehensive Spending Review (CSR) period to meet the challenges of significant reductions in police funding. Although these reductions have affected all rank groups within the police service, arguably the greatest impact has been experienced by members of the Superintending ranks. The decision by two forces to arbitrarily remove the rank of Chief Superintendent without any evidence base to do so further calls into question the appropriateness of current pay mechanisms.

4.2.2 We are aware that specific pieces of work that have resulted from the Leadership Review undertaken by the College of Policing, and which will be referred to subsequently, may lead to alternative pay mechanisms being proposed in due course. Although these strands of work are at this stage relatively embryonic, the PSAEW has indicated a willingness in principle to consider alternative mechanisms for remuneration.

4.3 The changing policing landscape as it relates to members of the Superintending ranks

4.3.1 A presentation was delivered to members of the PRRB on the roles of Superintendents and Chief Superintendents in England, Wales and Northern Ireland on 1st July 2014. This was accompanied by a briefing document. Members of the PRRB will have
since gained first-hand knowledge of these roles through the various visits to police forces undertaken by them.

4.3.2 The scope of the roles performed by members of the Superintending ranks has changed markedly since 2010 when austerity measures were first introduced. Up until this point, there was a fairly consistent approach to command responsibilities throughout the UK. The ‘building block’ of policing was the ‘BCU’ model (Basic Command Unit). Such units were typically co-terminus with one of more local authority areas. In some police force areas, BCUs were sometimes referred to as either ‘Divisions’ or OCUs (Operational Command Units). Overlaying territorial policing areas were specialist commands to deliver those policing functions that either could not be delivered locally, or where it was impractical to do so.

4.3.3 The territorial policing areas referred to (by whatever name) and specialist support functions were typically commanded by members of the Superintending ranks. Whilst the size of commands varied across the country, a Chief Superintendent in charge of either a territorial policing area or a specialist support function would typically expect to have between 400 and 700 police officers under his/her command. The operating principle was that the BCU Commander was responsible for the delivery of policing across his/her area, and was held accountable for such.

4.3.4 In addition to undertaking the core responsibilities associated with their specific command function, most Superintending ranks would also provide either an ‘on duty’ or ‘on call’ support to the force ‘out of hours’ and at weekends to discharge Gold/Silver command responsibilities; deal with critical incidents from a command perspective and fulfil legal responsibilities around those authorisation requirements enshrined either in law or force policy.

4.3.5 Since 2010, police forces have undergone radical re-structuring, business re-engineering and down-sizing in order to meet the demands of significantly reduced budgets. Whilst all ranks have to some degree been affected, the biggest impact has undoubtedly fallen upon members of the Superintending ranks. The number of Superintendents and Chief Superintendents across England, Wales and Northern Ireland has reduced from 1,733 in June 2010 to 1,289 in October 2015 (based upon PSAEW and SANI membership data). This amounts to a reduction of 25.6% over a five year period. This figure is masked somewhat due to an increase that has taken place in the number of Superintendents and Chief Superintendents seconded to HMIC (currently in the region of 50) who, whilst featuring as part of the PSAEW’s membership, are not performing operational roles within a police force.

4.3.6 Two forces, Northamptonshire and Wiltshire have removed entirely the rank of Chief Superintendent from their force command structures. This is despite there being quite clear differences between the roles as set out in the Police Professional Framework developed by
Skills for Justice. Wiltshire has also removed the rank of Chief Inspector. The removal of ranks without any re-definition of roles and responsibilities has had the effect of artificially suppressing salary levels.

4.3.7 Whilst some forces have retained the BCU model, many have not. There is now no consistent model of policing across England and Wales. Many forces have adopted a ‘functional’ model where Superintending ranks have force-wide (or in some cases multi-force) responsibilities. Where BCUs have been retained, in many cases they have been merged to form larger territorial commands (super-BCUs). Examples of these will be referred to later in this submission.

4.3.8 Notwithstanding the significant reduction in numbers, Superintending ranks are taking on additional responsibilities and their spans of command are increasing markedly. Some of these are as a result of legislative changes but, for the most part, it is a result of a much reduced pool of officers endeavouring to cope with an increasing workload.

4.3.9 There has also been an increase in the number of collaborative arrangements being developed between forces which are led by members of the Superintending ranks. For example, Kent and Essex share a Major Crime Unit whilst Hertfordshire, Bedfordshire and Cambridgeshire share a Professional Standards Unit. Tarian and Titan are both Regional Organised Crime Units that encompass more than one force area.

4.3.10 Further changes have resulted from the increased scrutiny being applied to certain areas of policing involving joint working with partner agencies where public enquiries have resulted from critical incidents. For example, the responsibility for protecting vulnerable people has, quite rightly, become a much higher priority than ever it was. Protecting Vulnerable People units are commanded in most cases by members of the Superintending ranks. These are very demanding and critical roles which necessitate operating routinely in areas of policing where there are very high levels of threat, risk and harm. If mistakes are made in a case review, or other decision-making process; or some factors are inadvertently over-looked, a critical incident will almost certainly result and, in the worst case scenario, possibly the death of a vulnerable individual.

4.3.11 Now becoming established, the introduction of Police and Crime Commissioners (PCCs) in England and Wales changed the governance structure within policing. Although PCCs have no operational responsibilities, members of the Superintending ranks report that their appointment has led to an increase in the demands placed upon them in terms of the provision of additional reports and briefings.

4.3.12 In many forces, members of the Superintending ranks are now performing the operational ‘strategic command’ functions previously undertaken by Chief Officers. This is adding to the responsibilities carried by, and the demands placed upon, a much reduced number of officers.
4.3.13 It is acknowledged that the Superintendents and Chief Superintendents are not the only rank group to experience a reduction in numbers since 2010. The Inspecting ranks have also experienced a reduction of around 17%.

4.3.14 Figures provided in respect of Chief Officer numbers, show that an overall reduction in posts of around 10% has occurred during the same period. This figure, when taken in isolation, can paint a somewhat incomplete picture as to the impact that this has had across England, Wales and Northern Ireland.

4.3.15 It is acknowledged that there are legislative requirements on police forces to have a Chief Constable, a Deputy Chief Constable and an Assistant Chief Constable. It is also acknowledged that many forces operate on a two Assistant Chief Constable model, which would make rationalisation difficult. However, figures obtained by the PSAEW from 42 police forces (excluding the MPS) show that since October 2010, a 4.6% reduction has taken place in the number of Assistant Chief Constables (down from 97 to 92.5); a 7.1% increase has taken place in the number of Deputy Chief Constables (up from 42 to 45) and a 9.8% reduction has taken place in the number of Assistant Chief Officers (down from 56 to 50.5). Assistant Chief Officers are non-warranted senior members of police staff. The figures in respect of the MPS have been slightly more difficult to plot with any certainty, however, it is reported that a 15% reduction in the number of Chief Officers has taken place over the same period. It is understood that one post at the rank of Assistant Commissioner has been removed, as has one post at the rank of Deputy Assistant Commissioner and three posts at the rank of Commander.

4.3.16 The purpose of making reference to this is for no other reason than to illustrate that, whilst the reduction in the number of Superintending and Inspecting ranks has taken place throughout England, Wales and Northern Ireland, the reduction in the number of Chief Police Officers has been rather less evenly spread with many police forces retaining the same size and structure of its executive whilst reducing significantly its middle and senior management rank groups.

4.4 The impact of the changing landscape upon members of the Superintending ranks

4.4.1 Although there has been a significant reduction in the number of Superintending ranks, there has been no corresponding reduction in either the workload or the expectations made of those that remain. In fact, the opposite is true.

4.4.2 Two surveys have recently been conducted of members of the PSAEW and SANI. One was a Personal Resilience Survey and the other a Workforce Survey.

4.4.3 The Personal Resilience Survey (PRS) was carried out by an Occupational Psychologist, Emma Donaldson-Feilder (Affinity at Work) on behalf of both the PSAEW and SANI. The surveys were carried out in 2014 and 2015 respectively. The questionnaire
completed by members of SANI was tailored to meet some of the particular challenges facing Superintending ranks in Northern Ireland. It was otherwise identical to that completed by members of the PSAEW. The response rates for the surveys were 81.4% (PSAEW) and 65.6% (SANI).

4.4.4 The Workforce Survey was conducted of both members of the PSAEW and SANI during June/July 2015. The survey was developed, and the responses analysed, by Dr Fran Boag-Munroe, a Research Practitioner with the PFEW. The response rate for the survey was 72%.

**Personal Resilience Survey**

4.4.5 Key themes that emerged from the survey of members of the PSAEW:

- 89% of respondents reported that the demands of their particular role had increased during the previous year.
- 64% reported that their span of command was such that it required excessive hours to be worked.
- 77% reported regularly working in excess of 50 hours per week with some regularly working in excess of 70 hours per week.
- 58% reported having insufficient resources/staff to do their job.
- 78% reported receiving work-related telephone calls ‘out of office hours’ and during the silent hours.
- 74% reported difficulties in achieving work/life balance.
- 95% reported taking work home with them.
- 41% reported that they do not receive the training that they require to do their job.

4.4.6 Key themes that emerged from the survey of members of SANI:

- 88% of SANI members reported working in excess of 50hrs per week with 26% working in excess of 60 hours per week.
- 68% reported having insufficient resources/staff to do the job.
- 88% reported receiving work-related telephone calls ‘out of office hours’ and during the silent hours.
- 70% reported experiencing difficulties in achieving a work life balance.
- 90% reported taking work home.
- 48% reported that they do not receive the training they require to do their job.

**Workforce Survey**

4.4.7 The following is an extract from the report prepared by Dr Boag-Munroe. It contains key themes identified during this survey of members of the PSAEW and SANI:

4.4.8 Morale amongst the Superintending ranks appears higher than amongst the federated ranks. 22% of respondents said that their personal morale was low, whilst 45% of
respondents reported high personal morale. A large majority of respondents the PSAEW survey also said that they had a strong attachment to the police and were willing to go the extra mile. 84% agreed that they had a strong personal attachment to the police and 93% agreed that they were willing to go the extra mile for the police; only 3% of respondents said that they were not willing to go the extra mile.

**Proportion of superintending ranks who agree and disagree with engagement indicators**

<table>
<thead>
<tr>
<th></th>
<th>Disagree</th>
<th>Neither Agree nor Disagree</th>
<th>Agree</th>
</tr>
</thead>
<tbody>
<tr>
<td>I am willing to go the extra mile for the Police</td>
<td>3%</td>
<td>93%</td>
<td></td>
</tr>
<tr>
<td>I feel a strong personal attachment to the Police</td>
<td>8% 9%</td>
<td>84%</td>
<td></td>
</tr>
<tr>
<td>I feel valued in the Police</td>
<td>33%</td>
<td>22%</td>
<td>45%</td>
</tr>
</tbody>
</table>

4.4.9 However, although at first glance these figures appear positive and are indicative of high levels of engagement amongst the Superintending ranks, they also highlight two areas of potential concern that should also be borne in mind. First, despite high levels of engagement, fewer than half of respondents said that they felt valued in the police. This suggests that for some officers there may be an imbalance between what they put into the police service and level of recognition and respect they receive from the service in return.

4.4.10 Researchers have previously argued that inequity of this nature can have negative consequences both for a person’s wellbeing and their long-term relationship with an organisation\(^1\); there is perhaps some indication of this latter outcome within other findings from the survey. For example, 63% of respondents said that they planned to stay in the police until pension age, however, only 12% said that they wanted to remain in police after they had attained maximum pensionable service. In addition, only around two in five respondents said that they wished to apply for further promotion, with just one in five respondents saying that they aspired to apply for chief officer rank.

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Superintending ranks intention to apply for further promotion

<table>
<thead>
<tr>
<th>Survey Question</th>
<th>Response Distribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Do you intend to apply for further promotion?</td>
<td>18%</td>
</tr>
<tr>
<td></td>
<td>41%</td>
</tr>
<tr>
<td></td>
<td>40%</td>
</tr>
<tr>
<td>Do you intend to apply for chief officer rank?</td>
<td>18%</td>
</tr>
<tr>
<td></td>
<td>21%</td>
</tr>
<tr>
<td></td>
<td>60%</td>
</tr>
</tbody>
</table>

4.4.11 Second, a possibly more immediate concern arising from the high levels of engagement reported in the PSAEW survey are the potential costs of high engagement. This is particularly pertinent in terms of its impact on working hours, recovery time and work-life balance\(^2\). The analysis indicated that there was a statistically significant negative relationship between respondents’ engagement and their work-life balance (even when controlling for a range of additional demographic and attitudinal variables). This means that as engagement increased the quality of respondents’ work-life balance decreased. As such, many Superintendents and Chief Superintendents appear to have made sacrifices in terms of their family life and recovery time because of their engagement and commitment to the police, and it is particularly important that these negative, as well as positive, consequences of engagement amongst Superintending ranks are taken into account.

4.4.12 The survey found that only one in three respondents had taken all of their annual leave in the last year, and just 17% of respondents had taken all of their rest days in the last three months. There is therefore clear evidence to indicate that a large proportion of superintending ranks see their work life encroach upon their life away from the police on an ongoing basis. Whilst the aforementioned "over-engagement" is likely to play a part in this, it must also be noted that 83% of respondents have experienced an increase in their workload in the last 12 months, with 80% saying that their workload has been too high over this period.

4.4.13 Therefore, although many respondents may choose to make sacrifices because they are engaged and committed to the police service, still more have to make these sacrifices simply to stay on top of their high and increasing workload. What this does highlight however is a need to differentiate between what can be expected from officers and what should be expected. Whilst officers might be willing to work long hours and go the extra mile for the police, there is the risk that this can be taken advantage of to their detriment. One such area where concerns may be raised is in relation to 'on-call' arrangements. All respondents to the survey reported performing 'on call' duties, with 92% reporting being 'on call' for up to fourteen days in any 28 day period. 4% reported being 'on call' on a permanent basis. Respondents were asked within the survey whether they were required to perform 'on-call' whilst either on rest days or annual leave for which no compensatory days off in lieu were then provided. This practice should not happen, yet 39% of respondents said that they did perform 'on call' on weekly or annual leave days without any compensation.
4.4.14 The challenges of workload and work pressure also have implications for respondents’ attitudes towards their pay. Although just fewer than half of respondents disagreed that their pay was fair considering the amount of experience and training they had, more than two thirds disagreed that they were fairly paid for their responsibilities and more than seven out of ten respondents did not feel fairly paid given the stresses and strains of their job and the number of hours they work in order to do their job. The pressures placed upon the Superintending ranks within their day-to-day job roles are notable factors in influencing attitudes towards pay.

**Proportion of superintending ranks who agree and disagree with engagement indicators**

<table>
<thead>
<tr>
<th>Statement</th>
<th>Agree %</th>
<th>Neither Agree nor Disagree %</th>
<th>Disagree %</th>
</tr>
</thead>
<tbody>
<tr>
<td>I am fairly paid considering the amount of experience and training I have</td>
<td>33%</td>
<td>21%</td>
<td>49%</td>
</tr>
<tr>
<td>I am fairly paid considering the responsibilities I have within my job</td>
<td>19%</td>
<td>11%</td>
<td>68%</td>
</tr>
<tr>
<td>I am fairly paid considering the number of hours I work in order to do my job</td>
<td>15%</td>
<td>12%</td>
<td>73%</td>
</tr>
<tr>
<td>I am fairly paid considering the stresses and strains of my job</td>
<td>15%</td>
<td>11%</td>
<td>74%</td>
</tr>
</tbody>
</table>

4.5 **Pay determined only by rank and length of service within a rank**

4.5.1 As stated previously, the PSAEW has questioned whether a mechanism whereby pay is determined only by rank and length of service within that rank is one that continues to be fit for purpose for its members and is willing, in principle, to consider alternative approaches to remuneration.

4.5.2 During the briefing session which took place on 1st July 2014, members of the PRRB were provided with a number of actual examples of those roles carried out by Superintending ranks across England, Wales and Northern Ireland. Updated versions of three of the examples provided are shown below together with a further example. These are not intended to either be an exhaustive or a fully representative list. They do, however, indicate the type of roles undertaken by members of the Superintending ranks as well as how these have changed over time.

- **Leeds BCU (West Yorkshire)** – This single BCU, under the command of a Chief Superintendent, was formed by merging three BCU’s - each of which was formerly under the command of a Chief Superintendent - into one. The BCU has 1,900 police
officers and members of police staff, and covers a diverse population of 760,000 people. In terms of police officer numbers alone, this BCU is either larger than, or equivalent to, ten of the current police forces in England and Wales, each of which has a Chief Constable, an executive team and a force infrastructure.

- **Transport for London and Roads Policing OCU (Metropolitan)** – This OCU is a new command that was created in 2014 which has responsibility for roads policing and Transport for London across 32 Boroughs. The OCU is commanded by a Chief Superintendent, has 2,500 police officers and police staff with contracts of approximately £100m. In terms of police officer numbers alone, this OCU is either larger than, or equivalent to, eighteen of the current police forces in England and Wales, each of which has a Chief Constable, an executive team and a force infrastructure.

- **District Commander - Belfast District Command (PSNI)** – Members of the PRRB were briefed on the role of the North and West Belfast District Commander in July 2014. At the time of the briefing, the Chief Superintendent in command of this District had responsibility for policing approximately half of the city of Belfast with approximately 500 police officers and police staff. He policed a population of 196,000 people who were from a majority Catholic/Nationalist/Republican background as well as a vociferous Protestant/Unionist/Loyalist minority, resulting in polarisation. In late 2014, the North and West Belfast District Command was merged with the South and East Belfast District Command under one Chief Superintendent where previously there had been two. The span of command of the Chief Superintendent has been extended to provide policing to a population of 330,000 with over 1,000 police officers and police staff. Sectarianism continues to pervade and legacy paramilitary organisations are still in operation. A ‘protest camp’ and nightly parades required a 24/7/365 Silver Command operation. Not infrequent attacks using guns and explosives take place on police patrols.

- **South Area Co-ordinator (PSNI)** - The Chief Superintendent (Area Co-ordinator) has responsibility for the delivery of uniform policing in six of the PSNI’s eleven Districts, each of which is co-terminus with a local council. The Area covers approximately 60% of Northern Ireland, including most of the international land border with the Republic of Ireland. Approximately 50% of Northern Ireland’s population reside within the South Area and 39% of recorded crime takes place there. The threat from dissident Republican terrorists remains severe. The Area covers South Armagh, Mid Ulster, and South Fermanagh where there are significant levels of terrorist activity. Excluding pay roll, the South Area Co-ordinator has responsibility for an annual budget of £25m and has 1,780 police officers and 168 police staff under her command.
4.5.3 In addition to their core roles, all of the officers in the above examples hold force-wide portfolios and undertake ‘on call’ duties for various command functions and to fulfil legal and force policy requirements.

4.5.4 The purpose of including these examples, and the extent of the individual commands, is not intended to promote an argument that Chief Superintendents with large and challenging commands have responsibilities that either equate to, or exceed, those of some Chief Constables. However, it is the view of both the PSAEW and SANI that the increasing spans of command for our respective memberships has, as a result primarily of the reduction in numbers, blurred the relationship between Superintendents and Chief Superintendents and between Chief Superintendents and Assistant Chief Constables/Commanders to the point where the relative pay scales determined by rank and length of service in many cases no longer properly remunerates individual members for the responsibilities carried by them. This is particularly apparent when comparisons are made across different forces and the small reduction in the number of ACC posts is taken into account.

4.6 Potential changes to the rank structure and pay mechanisms

4.6.1 Recommendation 2 of the College of Policing’s Leadership Review has led to a review of the rank structure which is being led by the NPCC’s lead for Reward and Recognition, Chief Constable Francis Habgood. This is work in progress and is referred to in greater detail in the joint PFEW/PSAEW submission. The review may, in due course, recommend changes to the current rank structure. At present, there is a very clear relationship between rank and remuneration which may not be so clearly defined in the future. It is not expected that that this piece of work will be completed until 2020.

4.6.2 The Metropolitan Police Service (MPS) has commissioned a piece of work by Deloitte in relation to the career components of attraction, development, reward and exit. Again, this piece of work is referred to in greater detail in the joint PFEW/PSAEW submission. One of the elements under consideration is a remuneration model based on contribution and competence, rather than time served. Although this piece of work is being undertaken by the MPS, it is anticipated that it will have implications for policing throughout England and Wales and potentially Northern Ireland too.

4.7 Recent Pay History

4.7.1 The current pay scales for Superintendents and Chief Superintendents are shown below as are the current pay scales for ACCs/Commanders.
## Superintendents

<table>
<thead>
<tr>
<th>Pay Point</th>
<th>Five Point Pay Scale with effect from 1st September 2015</th>
<th>Four Point Pay Scale with effect from 1st September 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>£64,188</td>
<td>£64,188</td>
</tr>
<tr>
<td>2</td>
<td>£66,834</td>
<td>£67,542</td>
</tr>
<tr>
<td>3</td>
<td>£69,480</td>
<td>£71,070</td>
</tr>
<tr>
<td>4</td>
<td>£72,135</td>
<td>£75,816</td>
</tr>
<tr>
<td>5</td>
<td>£74,784</td>
<td>-</td>
</tr>
</tbody>
</table>

*NB* Due to assimilation arrangements to move officers from the old five point pay scale to the new four point pay scale, some officers will remain on the five point pay scale until 31st March 2017.

## Chief Superintendents

<table>
<thead>
<tr>
<th>Pay Point</th>
<th>With effect from 1st September 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>£79,557</td>
</tr>
<tr>
<td>2</td>
<td>£82,248</td>
</tr>
<tr>
<td>3</td>
<td>£83,925</td>
</tr>
</tbody>
</table>

## ACC/Commander

<table>
<thead>
<tr>
<th>Pay Point</th>
<th>With effect from 1st September 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>2</td>
<td>£96,597</td>
</tr>
<tr>
<td>3</td>
<td>-</td>
</tr>
<tr>
<td>4</td>
<td>£102,822</td>
</tr>
<tr>
<td>5</td>
<td>£105,945</td>
</tr>
<tr>
<td>6</td>
<td>£109,056</td>
</tr>
</tbody>
</table>

*NB* Due to assimilation arrangements to move officers from the old six point pay scale to a new three point pay scale, pay points 1 and 3 have already been removed. The current pay point 5 will be removed in June 2016 to complete the transition.
4.7.2 There is a significant difference between the scale maximum for a Chief Superintendent and that of a newly appointed Assistant Chief Constable/Commander. This difference becomes even more significant when non-pay benefits made available to the latter rank groups are also taken into account. Such non-pay benefits are a matter of contract and are determined at a local level. We understand that, as such, there is no accurate national picture available.

4.7.3 New pay scales were introduced in April 2012 for both Superintendents and Chief Superintendents resulting from recommendations arising from the Winsor Review.

4.7.4 The pay scale for Superintendents was reduced from five points to four and the scale maximum was increased by approximately £1,000. This was funded by discontinuing Performance Related Bonus payments (PRB) and double increment progression.

4.7.5 The pay scale for Chief Superintendents was maintained at three points but each scale point was increased by approximately £3,000. This was funded by discontinuing Performance Related Bonus Payments and double increment progression as well as Post Related Allowances (PRAs).

4.7.6 Only Chief Superintendents were eligible to receive a PRA, which was a non-pensionable allowance of £5,001, payable to those officers considered to have particularly complex and demanding commands. Approximately 35% of Chief Superintendents were in receipt of such a payment.

4.7.7 Superintendents were not eligible to receive a PRA on the assumption that if they met the criteria for such a payment they would be promoted to Chief Superintendent rank.

4.7.8 Although the Winsor Review had no locus in Northern Ireland, the recommendations as they related to members of the Superintending ranks were implemented in 2014, although slightly different assimilation arrangements were put in place.

4.7.9 Whilst the revised pay scales were implemented in April 2014, the majority of the data used to inform the Review was gained prior to 2012, and before the significant reductions took place in the number of Superintendents and Chief Superintendents, with the resultant changes in responsibilities and increased spans of command.

4.7.10 There is currently no provision within Police Regulations and determinations for Chief Officers to remunerate members of the Superintending ranks outside the established pay scales for their rank and length of service in that rank. Where senior police staff posts are merged, there is an opportunity for Chief Officers to review the levels of salary awarded and it is our understanding that some Chief Officers have chosen to take just such an approach.
4.7.11 It is the view of both the PSAEW and SANI that the nature of the roles and responsibilities carried by our respective memberships are no longer either properly or fairly remunerated by a pay mechanism that is determined by rank and length of service in that rank alone. We are willing in principle to consider moving away from this model to one where factors such as contribution; span of command; complexity; responsibility and risk factors are also taken into account. It seems likely that the reviews of rank structures and career components referred to previously may lead in this direction. However, any changes that may result are unlikely to be implemented until 2020 at the earliest.

4.8 A Proposed Interim solution

4.8.1 The changes experienced by members of the Superintending ranks began in 2010/11 and are ongoing. Although the most recent CSR was more favourable than was anticipated, both Associations anticipate that further reductions will take place in the number of Superintendents and Chief Superintendents across England, Wales and Northern Ireland during the next few years as reform programmes continue. In our view an interim solution is required to ensure those whom we represent are properly and fairly remunerated for the additional workload, responsibilities and spans of command that they now carry. Until such time as the reviews being undertaken have been completed we propose the following as an interim solution:

- That Chief Officers be empowered to pay a non-pensionable allowance over and above an officer’s basic salary to those Superintending ranks in roles where such a payment is considered justified.
  - For a Superintendent, such an allowance would be up to 100% of the difference between the officer’s basic salary and that of a newly promoted Chief Superintendent.
  - For a Chief Superintendent, such an allowance would be up to 100% of the difference between the officer’s basic salary and that of a newly promoted ACC/Commander.

4.8.2 The payment of such an allowance would be at the discretion of a Chief Officer and determined locally. Whilst this is a somewhat imperfect solution to a problem, and is one that we would not ordinarily propose, the alternative is to wait until the various strands of work currently in progress have been completed. As previously stated, this is unlikely to be until 2020. We consider it unreasonable for those members of the Superintending ranks whose roles have been extended significantly not to be properly remunerated in the meantime and, in those forces where the rank of Chief Superintendent has been removed, for pay to continue to be artificially suppressed.

4.8.3 We consider that an enabling provision of this nature would grant Chief Officers greater flexibility to reward those officers who have taken on additional responsibilities, or expanded spans of command. Such an approach would be consistent with the Government’s continued commitment to maximising flexibility for Chief Constables and
4.8.4 Police and Crime Commissioners to manage their workforce in the most efficient way possible at a local level as stated within the Home Secretary’s remit letter.

4.8.5 We do not regard this proposal as ‘targeting’ in accordance with the Chief Secretary to the Treasury’s letter of 19th August 2015, and to which we are opposed for those reasons stated in our joint submission with the PFEW. We are not proposing that any such non-pensionable allowances are considered as part of the 2016/17 pay award but should be dealt with separately.

4.8.6 We would welcome the PRRB considering this proposal and making a recommendation in relation to it.

4.9 Taxation on Pensions and the Impact upon Promotions - Creating ‘freedom of choice’ in respect of pensionable pay for members of the Superintending ranks

4.9.1 Although pensions do not come under the remit of the PRRB, its Terms of Reference state that it should be “mindful of developments in police officer pensions to ensure that there is a consistent, strategic and holistic approach to police pay and conditions”. Pension provision is also considered to be deferred salary and, as such, must be taken into account as part of an officer’s overall remuneration. To this end, we would like to draw the PRRB’s attention to a pensions’ taxation issue, the Annual Allowance, which impacts disproportionately on members of the Police Pension Scheme (PPS) 1987. This, in turn, is having a negative impact on promotion to senior ranks.

4.9.2 On 6th April 2006 various changes were brought in to simplify the pensions’ taxation regime. One of these was the Annual Allowance (AA). The AA is the maximum amount of pension savings an individual can accrue each year that receives taxation relief. The effect of the AA charge is to remove taxation relief on any pension savings over the available AA. The AA was originally set at £215,000 in 2006 and had increased to £255,000 by 2010-11. However, instead of remaining at £255,000 in 2011-12, it was reduced to £50,000. Since 6th April 2014, the AA has been set at £40,000.

4.9.3 In order to determine the value of pension savings for defined benefit schemes, such as the PPS 1987, a member works out the value of their pension on 1st April, the first day of the Pension Input Period (PIP). This is then multiplied by sixteen, the factor used to value defined pension benefits. The whole amount is then increased by the twelve month increase in the CPI to the September before the start of the taxation year for which the AA is being calculated.

4.9.4 The member then calculates the closing value of the pension at the end of the PIP (31st March for PPS 1987 members). This is done by taking the amount of the pension on 31st March and multiplying it by the defined benefit factor of sixteen. The increase in the
value of the pension is the value at the close of the PIP minus the value at the start of the PIP (uprated by CPI). It is this amount which is assessed against the AA.

4.9.5 The AA disproportionately impacts upon police officers in the PPS 1987 because of its double accrual feature which provides that in the last ten years in the scheme the pension increases at a rate of 2/60\textsuperscript{th} instead of 1/60\textsuperscript{th}. This means that PPS 1987 officers in the last ten years of service accrue pension at a faster rate and are therefore more likely to breach the AA. This impacts upon members of the Superintending and Chief Officer ranks particularly but, due to the dramatic reduction in the AA, it can also affect officers in the Sergeant and Inspecting ranks. Various examples are included within the joint PFEW/PSAEW submission.

4.9.6 In order to avoid breaching the AA, we are aware that officers are now choosing not to put themselves forward for promotion, including temporary promotion. Those seeking promotion to (and within) the Superintending and Chief Officer ranks will, for the most part, be longer in service and consequently are more likely to be double accruing members of the PPS 1987.

4.9.7 It is worth noting that subsequent police pension schemes have single rates of accrual. The only beneficiary of the double accrual rate found in the PPS 1987 is the employer. Early leavers, or those who die in service, would receive less pensionable benefit than they would had the scheme a single rate of accrual of 1/45\textsuperscript{th} for each year of service. Parity between the double accrual and a 1/45\textsuperscript{th} single rate of accrual is only achieved at the point at which an officer attains 30 years of service, at which point all future accrual ceases. The combined effect of the reduced AA and the double accrual structure of the PPS 1987 means that officers who are promoted, either substantively or temporarily, during their first twenty years of service are treated differently, and more beneficially, than their colleagues who are promoted during their last ten years of service. This is not equitable.

4.9.8 The results from the PSAEW/SANI Workforce Survey show that of those officers who have indicated they do not intend to apply for further promotion, 26\% would not do so because of the impact on their pensions of the AA taxation charge (and also the Lifetime Allowance taxation charge, against which pension benefits are measured at retirement). We also have concrete examples of officers who either did not take, or did not apply for, a temporary promotion because of the risk of incurring an AA taxation charge without receiving any increase in pensionable benefit from the promotion. This is because only pensionable pay in the last three years of service counts towards the final salary calculation in the PPS 1987. Therefore, officers who are temporarily promoted earlier than their last three years of service may consequently incur a tax charge but will receive no increase in their pension benefit (based on the higher salary) as a result of the promotion. An example of the impact this has had is a Superintendent in Wiltshire with 24 years of service who deselected himself from applying for three regional roles as a Chief Superintendent due to the potential to incur an AA taxation charge but no additional pensionable benefit.
4.9.9 We are concerned that not only is this situation prohibiting officers' career progression, it is also negatively impacting upon the operational ability of forces to promote those most competent and appropriately qualified for the role.

4.9.10 A practical solution to this problem would be to allow members of the three police pension schemes to be able to treat as non-pensionable, in whole or in part, any pay increase that would cause them to breach the AA. The default position would be that the increase would remain as pensionable pay. A precedent for this type of provision has already been set as, under Police Regulations 2003 and determinations, Assistant Chief Constables (and equivalent ranks in London) receiving temporary salary can receive up to 90% of the higher rank's basic pay or receive a non-pensionable honorarium of an amount determined by the chief officer of the local policing body (in respect of chief officers). Also, Superintending ranks who are temporarily promoted to, or who receive temporary salary in respect of performing at, the rank of Assistant Chief Constable/Commander can request to receive up to 100% of the increase in pay as a non-pensionable honorarium. This agreement is detailed in PNB Circular 2014/20 which was ratified subsequently by HO Circular 19/2014.

4.9.11 An advantage of this provision for the employer is that if an element of pay is non-pensionable, employer pension contributions will not need to be paid in respect of it. This will also reduce pension scheme liabilities. This practical arrangement has already been made available to chief fire officers.

4.9.12 Such a provision would require a change to the police pension regulations and would consequently need to go through the Police Advisory Board for England and Wales. However, a recommendation by the PRRB that the negative impact of the pensions' taxation regime on promotion needs to be addressed would be welcomed.