



Submission to

The Police Remuneration and Review Body

on behalf of

the Police Federation of England and Wales (PFEW)

and

the Police Superintendents' Association (PSA)

29<sup>th</sup> January 2021

Police Federation  
Of England and Wales



Ffederasiwn Heddlu  
Lloegr a Chymru

Established by Act of Parliament

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NATIONAL SECRETARY'S OFFICE

29<sup>th</sup> January 2021

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

***Re. Seventh submission to the PRRB, from the Police Federation of England and Wales, and the Police Superintendents' Association, dated 29<sup>th</sup> January 2021***

*Dear Ms Bharucha*

Below is our seventh submission to the Police Remuneration Review Body. This is a joint submission provided on behalf of the Police Federation of England and Wales (PFEW), and the Police Superintendents' Association (PSA).

We know that the Chancellor has already announced that there should be a "pay pause" which would deny our members an uplift despite the vital work that they have undertaken during this terrible period: the danger they have been exposed to, the risks they have had to take; and the long hours and distressing workload. The Home Secretary states in the remit letter that the Government has only taken this decision in extraordinary circumstances: but this is the fifth time out of seven PRRB rounds that your deliberations have been stifled and your independence disregarded. We suspect that you share our frustration.

In our submission we question whether the directive to award no uplift is an economic necessity. The Spending Review awarded forces sufficient money for officers to be recognised for the work they have done in protecting the public. Denying that the budget exists serves no purpose, and will likely have a negative effect on recruitment and retention at the very time we need more officers protecting the public.

We ask that you do your work according to the remit you were given: independent of government, and using the evidence available. Review the data provided by all parties, and

draw your own conclusions. On the basis that there is scope in budget for an uplift, and that the private sector has rewarded its key workers with thank you payments, we seek for you to support a pay rise of 3%, and a thank you bonus to all officers payable under Regulation 34.

As ever, we are grateful for your consideration of our evidence, and look forward to your recommendations.

Yours faithfully,

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

Alex Duncan, National Secretary of PFEW

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

Dan Murphy , National Secretary of PSAEW

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

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## Table of Contents

|          |  |           |
|----------|--|-----------|
|          | Lists of Tables.....   | 6         |
| <b>1</b> | <b>Executive Summary .....</b>   | <b>7</b>  |
| <b>2</b> | <b>Chapter 2 Introduction .....</b>  | <b>11</b> |
| 2.1      | The remit letter process and content .....   | 11        |
| 2.2      | Our response.....  | 14        |
| <b>3</b> | <b>Chapter 3 Context, and matters pertaining to PRRB standing remit on recruitment and retention .....</b> | <b>16</b> |
| 3.1      | COVID: Officer experiences .....   | 16        |
| 3.2      | The inherent danger of the role .....  | 19        |
| 3.3      | Pay and morale survey.....   | 19        |
|          | Attitudes to recruitment and retention .....   | 20        |
| 3.4      | Current officer numbers and 20,000 uplift.....   | 20        |
|          | 20,000 Uplift: Pressure on Sergeants .....   | 21        |
| 3.5      | Affordability.....   | 23        |
|          | Existing Police budgets.....   | 23        |
|          | Wider UK public spending, and the budget deficit .....   | 24        |
|          | Public / private salary increases .....  | 26        |
| <b>4</b> | <b>Chapter 4 Remit letter topics.....</b>  | <b>28</b> |
| 4.1      | Ongoing work, outside the remit letter .....   | 28        |
| 4.2      | Those earning under £24,000.....   | 29        |
| 4.3      | The Pay Progression Standard.....  | 29        |
|          | Practical barriers.....  | 30        |
| 4.4      | The P factor: method of use, and valuation .....   | 32        |
|          | Method of use .....  | 32        |
|          | Valuation.....   | 32        |
| 4.5      | Benchmarking.....  | 34        |
| 4.6      | Targeted Variable Payments .....   | 41        |

## **Lists of Tables**

|   |           |
|---|-----------|
| <b>Table 1 Cost of pay increases as % of virus related measures in year .....</b>                             | <b>25</b> |
| <b>Table 2 P Factor calculations (NRT provided data) .....</b>  | <b>33</b> |
| <b>Table 3 Officer pay compared to IDR comparators: officer pay as percentage of comparator pay .....</b>     | <b>36</b> |
| <b>Table 4 Competitive pay (expressed as comparator pay adjusted to 40 hours, plus P factor at 13%) .....</b> | <b>38</b> |

# 1 Executive Summary

- 1.1.1 In the Spending Review on 25<sup>th</sup> November 2020 the Treasury announced that there would be a pay “pause” across the public sector. This means that in the seven years of its operation there have been only two years when the PRRB was allowed to make recommendations which were then accepted by government. We invite the Home Secretary to consider what message this sends to officers about the seriousness with which government takes this supposedly independent process.
- 1.1.2 Ironically, in the same Spending Review the Chancellor announced measures totalling £400 million extra for the Uplift programme, and £320 million for policing to be raised through Council Tax increases. An uplift to officer pay is therefore affordable within the budgets allocated to forces. Yet Chief Constables are restrained from exercising their ability to reward officers for the dangerous and challenging tasks they have faced this year. This makes the decision to insist on a 0% uplift seem more a political act, than economic necessity.
- 1.1.3 The explanation set out in the remit letter for this “pause” is that because of the pandemic private sector pay has fallen, while public sector pay “has been shielded”. Government does not want the gap between private and public sector pay to worsen. We question the reasoning behind these statements. The benchmarking work we present in this document demonstrates that for several ranks officers are paid at only around 80% of comparators in the private sector, when earnings are adjusted for hours worked and the P factor (which recognises the unique nature of the role). It is questionable whether withholding an uplift from only 130,000 officers will make any real difference to relativities, especially as over a million public sector workers will – justifiably – receive an increase that had already been negotiated prior to the pandemic. Finally, data provided in the Labour Research Department demonstrates that in the last year workers in the private sector attained pay settlements with a median of 2.5%. Many were agreed even after COVID hit. It is true that some parts of the private sector have been hit hard, and there have been many redundancies. But the impact has been extremely variable, and in parts of the private sector where workers have been essentially key workers in the pandemic (e.g. the food and supermarket sectors) workers have had good pay increases, and many companies awarded staff thank you payments of £1,000 or thereabouts. The private sector has

rewarded its key workers, while the government has failed to do so for public sector workers.

1.1.4 We believe that the government may be trying to reduce the deficit by suppressing public sector pay. But the deficit this year is around £3.90 billion, and government has spent £73.3 billion on employment support measures, and £279.9 billion on overall virus related measures. The entire basic pay bill for England and Wales has a value equivalent to just 1.6% of virus related spend. The cost of an uplift to reward officers would be equal to only 0.02% of this expenditure (for each 1% on basic pay). The impact on the deficit is miniscule.

1.1.5 We believe that rather than try to create a narrative suggesting that public sector pay has been “shielded” it is right that government should adequately reward officers for their heroic efforts this year. Pay must be set at a level to recruit and retain people into a profession that is critical to the safety and welfare of the country.

1.1.6 The context for this pay “pause” is that:

- Over one third of officers have told us they did not have access to Personal Protective Equipment when they needed it.
- Officers have had to deal with 64 legislative changes (1 every 4 days), in the face of a high degree of press and public scrutiny, with frustration directed at officers.
- One third of Federated ranks reported that a member of the public believed to be carrying COVID-19 had threatened to attempt to infect them with the virus.
- Officers have dealt with distressing tasks on a level far in excess of that previously, including dealing with bodies, and with huge increases in mental health and threats of suicide calls from the public.
- Over three quarters of officers feel they are not fairly paid for the risks they have had to take and the responsibilities held during COVID.
- In the period to 28<sup>th</sup> December 2020, 20 Constables or Sergeants died, with COVID recorded as being involved in the death.

1.1.7 We believe the PRRB process should have proceeded unhindered this year. Chief Constables should have been allowed to present their evidence, and the PRRB allowed to examine whether force budgets in fact allow for an uplift. We suggest that the argument put forward by government regarding the public / private sector divide is spurious, and that the Treasury decision to pause public sector pay was a knee-jerk attempt to save pennies, in a moment when the deficit this year caused by expenditure on COVID must have seemed overwhelming.

1.1.8 We therefore recommend that:

- Recommendation 1 An uplift of 3% should be awarded to all officers.
- Recommendation 2 Existing regulations (Reg 34, annex U) regarding bonus payments can and should be used to ensure all officers are given a thank you payment for the COVID response.

1.1.9 A number of specific issues are raised in the remit letter or in the PRRB call for evidence. These are: how the pay uplift of £250 can be awarded to those earning under £24,000; the Pay Progression Standard; benchmarking, and the P factor; and Targeted Variable Payments.

1.1.10 Last year we asked that the two pay points below £24,000 (pay point -1 and 0) be removed, as being utterly inappropriate. We repeat that recommendation. We suggest that the fairest (and simplest) way to ensure officers currently earning below £24,000 receive at least the uplift the Chancellor approved is to simply move them all to pay point 1, which is £24,780. This would require no regulatory change.

- Recommendation 3 Pay points -1 and 0 should be removed.

1.1.11 Much has been achieved in year that is outside of the PRRB and remit letter scope. The staff associations have worked closely with the NPCC National Reward Team to resolve issues pertaining to officer pay and conditions that have been necessary to support them during COVID. Government departments have been less involved in this process perhaps because they have had to attend to other priorities during this time. Nonetheless in many cases we have been able to reach agreement and provide guidance that gives clarity and fairness. This has naturally meant that some of the progress on pay reform has been slowed this year. The biggest barrier to reform remains the lack of funding.

1.1.12 With regard to the Pay Progression Standard, there is agreement over the principles of reform. Practical barriers remain: notably the inconsistency of force Performance Development Reviews.

1.1.13 Significant process has been made on benchmarking and the P factor. We know that the NRT will provide benchmarking data sourced from Korn Ferry, whereas we provide data from IDR. This is by mutual agreement and an acceptance that there is a need to use several sources of data in order to triangulate. Crucially we are agreed on the key recommendations regarding benchmarking and the P factor, these being:

- Recommendation 4 Support the use of benchmarking as set out in this submission, and that of the NRT.
- Recommendation 5 Support the definition and valuation of the P factor, and its use in benchmarking (as agreed by the NRT and staff associations).
- Recommendation 6 Agree that the maximum value of the P factor should be 13% of the top of the Constable salary.
- Recommendation 7 Agree that the PRRB will review the notional value of the P Factor, along with the associated descriptors, at least every 5-years.
- Recommendation 8 The PRRB should insist that a timetable be set out to ensure that the pay scales are amended to take officer pay to the points where the evidence leads: i.e. competitive pay as calculated using benchmarking.

1.1.14 The last of these is extremely important. It is right that effort has been expended on benchmarking officer pay. But this must not become merely an academic exercise. Our data show that many officers are being paid only about 4/5 of comparators. This must be rectified as soon as possible.

1.1.15 Finally, regarding Targeted Variable Payments, we believe these are important rewards for those on hard to fill roles. We have recently received draft determinations which make some improvements. We welcome the proposal to increase the maximum payable to £5,000. Our remaining concerns, which we have stated in previous PRRB submissions, pertained to equality issues. We are very pleased that this month the Home Office have agreed to undertake to draft an Equality Impact Assessment, and that the Home Office have further indicated that the intention is to ultimately use “a form of job or role evaluation to ensure consistency in approach both within and across forces”. We see both the recognition of the need for an EIA and the need to use some form of job or role evaluation as significant successes for the staff associations, highlighting the vital role we play in holding the employer to account.

Recommendation 9 We welcome the Home Office’s agreement to conduct a national EIA and to ensure that going forward TVPs contain an element of role / job evaluation. We believe the PRRB has a role to play in monitoring the realisation of these promises.

Recommendation 10 The new determination on TVPs should be consulted on, and TVP payment maximum should be increased to £5,000.

## 2 Chapter 2 Introduction

### 2.1 The remit letter process and content

2.1.1 The Police Remuneration Review Body remit letter for the 2021-2022 pay round was published on 17<sup>th</sup> December 2020, and responses initially sought by 22<sup>nd</sup> January 2021. This allowed just twenty-two working days to prepare responses, over the Christmas period.<sup>1</sup>

2.1.2 This year all the pay review bodies are prevented from considering a pay uplift, as the Chancellor of the Exchequer insisted in the Spending Review in November 2020 that pay awards be “temporarily paused”. We understand the nature of the fiscal concerns expressed, and the government’s argument that COVID is responsible. However, sadly government’s constraint of the PRRB has by no means been limited to “extraordinary circumstances”, as is claimed in the letter.

2.1.3 This is the seventh year of the Police Remuneration Review Body.

- In both years 1 and 2 (2015-2017) the PRRB was directed to award no more than 1%, before the process of submitting and examining evidence was even begun.
- In both years 3 and 4 (2017-2019) the independent recommendation of the PRRB was not accepted by the Home Secretary: police received a total 3% over two years, instead of the 4% recommended.<sup>2</sup> The evidence was therefore ignored.
- Only in years 5 and 6 (2019-2021) were the PRRB recommendations unfettered and accepted by government: this was for 2.5% in each of the two years.
- Now, in year 7, the PRRB has been told there must be a “pay pause” and 0% uplift.

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<sup>1</sup> This is part of a pattern whereby the period allotted to complete submissions has grown shorter each year. For example, the first remit letter was received 3<sup>rd</sup> November 2014, with a submission date of 9<sup>th</sup> January, some 8 working weeks later. Each year since the period during which parties are expected to prepare responses has been shortened. As this is the only way in which staff associations are able to make representations regarding questions of pay that have a significant impact on officers’ lives and morale, we believe this sets an extremely poor example of employee relations and consultation.

<sup>2</sup> In 2017/18 the PRRB recommended 2%: the government awarded 1% consolidated and a further 1% unconsolidated. In 2018/19 the PRRB specified that the 1% unconsolidated from the previous year should be consolidated and an *additional* 2% awarded. The government awarded only 2%, causing the PRRB to comment on the failure to accept its recommendations, and the impact this would have.

- 2.1.4 Thus the Treasury has stepped in again and prevented the PRRB from doing the job that government set it up to do. In its short history the PRRB has been allowed to function as intended in only 2 out of 7 years.
- 2.1.5 We invite the Home Secretary to consider what message this sends to officers and their representatives about the seriousness with which government treats this process.
- 2.1.6 The remit letter itself is replicated below:

Home Secretary  
2 Marsham Street London SW1P 4DF

BY EMAIL ONLY  
Anita Bharucha  
Chair  
Police Remuneration Review Body  
Office of Manpower Economics  
Fleetbank House  
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EC4Y 8JX

16 December 2020

Dear Anita,

I would like to thank the Police Remuneration Review Body (PRRB) for your work over the past year and for your recommendations and observations on police officer pay in your 2020 report. The Government appreciates and values the independent, expert advice and contribution that the PRRB makes.

The timing of the Spending Review announcement has unfortunately delayed the commencement of 2021/22 pay round. I am writing now to set out how the Government proposes working with the PRRB in this pay round, and to set out the areas I would like you to consider.

At the Spending Review, the Chancellor of the Exchequer announced that pay rises in the public sector will be restrained and targeted in 2021/22. As the Chancellor set out, coronavirus is significantly impacting the economy, labour market and the fiscal position and has suppressed earnings growth and increased redundancies in the private sector. Public sector pay has been shielded from the pandemic's economic effects. Since March, the number of people in employment in the UK fell by 782,000, whilst over a similar period of time public sector employment increased.

If we continued with rises across the board, the existing gap between public sector reward and the private sector would widen significantly. Therefore, it is right to temporarily pause pay awards for the majority of the public sector as we assess the impact Covid-19 has had on the wider economy and labour market. This approach will also allow us to protect public sector jobs and investment in public services as Covid-19 continues to have an impact.

We will be able to reassess this picture after 2021/22 when the fuller impact of Covid-19 on the wider labour market will be clearer.

No member of the police workforce will face a cut to their existing reward package and the pause will apply to headline pay uplifts only – other payments, such as progression pay, overtime and special allowances will continue as before. HM Treasury will set out the justification and evidence for this policy in more detail in the upcoming informal economic discussion, which will be followed by the publication of the official economic evidence paper.

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.

I ask that your recommendations and observations are considered in the context of the Government's commitment to increase police officer numbers by 20,000 over three years, while improving officer welfare and leadership - aims which should be supported by the pay structure.

As in previous years, I would also ask you to have regard to the standing terms of reference as set out in previous remit letters.

I offer my thanks to you for your continued hard work in this important area. I look forward to receiving your report no later than early May, subject to further discussion with the OME.

Rt Hon Priti Patel MP

2.1.7 It is disappointing that in setting out the rationale for this pay “pause” the remit letter focuses only on the fact that earnings in the private sector have been suppressed, and states that “public sector pay has been *shielded* from the pandemic’s economic effects”. (Our emphasis). There is no mention of the incredible work that our members and other public sector workers have undertaken during this terrible period; the danger they have been exposed to, and the risks they have taken to their own health and that of their families; the long hours and distressing workload; the fact that it is largely public servants – covered by the pay review bodies – who have fulfilled key worker roles.

2.1.8 We understand that from an economic perspective many of those in the private sector have been hard hit. We do not claim, either, that our members have undertaken these sacrifices in expectation of monetary reward. However, in focusing only on the supposition that the notional pay gap between private and public sector pay will widen due to the pandemic, the remit letter fails to acknowledge that it is also right – perhaps in this year more than any other – to focus on the inherent value of the work done, and provide fair pay for this: rather than merely focusing on the perceived differentials between jobs. Furthermore, we dispute the accuracy of the

assumption that the pay gap is in our members' favour. Our benchmarking work, set out in this submission, demonstrates otherwise.

2.1.9 Officers understand that government expenditure this year has been unprecedented. They understand that the Treasury will likely seek to recoup money that it had previously intended be spent in the public sector, in order to reduce the national debt. Perhaps it would be a more palatable remit letter if it facilitated open and frank conversations, instead of pressing the divisive message that officers are already well paid and will be riding out this storm in a better position than other members of the public.

2.1.10 We hope that in future years the Home Secretary will reflect on this, and that the remit letter will acknowledge the need to adequately reward officers so as to recruit and retain people into a profession that is critical to the safety and welfare of the country.

## 2.2 Our response

2.2.1 Via the Office of Manpower Economics the PRRB has made evidence and information requests of all respondents. These include requests pertaining to the PRRB's standing remit (e.g. recruitment retention, and motivation of staff). The remit letter seeks that the PRRB consider the context of the 20,000 uplift, while the PRRB points to the need to cover the impact of COVID-19. In order to satisfy the need for evidence regarding the broad context for the pay recommendations, we provide evidence on these matters in Chapter 3.

2.2.2 Nonetheless our submission is focused mainly on those specific matters contained in the remit letter, and we understand the constraints placed on the PRRB by the government. In Chapter 4 we therefore present our views on the three matters that are listed in the remit letter, these being:

- How the pay uplift of £250 can be awarded to those earning under £24,000. (A measure announced in the Spending Review.)
- Recommendations on the pay progression standard. (Part of the pay reform process).
- Benchmarking, and the P factor. (These are also components of the pay reform process).

2.2.3 Further, because the PRRB has specifically asked for evidence about Targeted Variable Payments (another aspect of pay reform, and one which is currently designated as a temporary measure) we also set out our current position on these. This is presented in Chapter 4, alongside the other pay reform measures.

### **3 Chapter 3 Context, and matters pertaining to PRRB standing remit on recruitment and retention**

#### **3.1 COVID: Officer experiences**

3.1.1 We feel it is critical that we remind the PRRB and government of the context in which government has chosen to deny any pay uplift to the public sector, and therefore we include a short section on the experiences of our members during what has been a very distressing year for all. We invite the PRRB to consider how these experiences, coupled with a pay freeze, are likely to impact on recruitment and retention.

3.1.2 From the earliest days of the crisis we invited local Single Points of Contact to report on the experiences of members: in particular, whether they had adequate safety measures in place, and whether forces were supporting them as best they could expect. For example, eleven surveys were conducted between April and July alone, tracking progress. These were provided to Op Talla. It is clear that, while Personal Protective Equipment (PPE) guidance and policy were in place very early on, the data also indicated that this did not translate to sufficient PPE access. We understand this was a reflection of the of nation-wide supply and logistical issues suffered across the emergency services, and forces improved rapidly: nonetheless, our members were, for a period, working without sufficient PPE.<sup>3</sup> When we conducted our Pay and Morale survey in August 2020, we found that over a third of officers (34%) said they had not had access to PPE when they had needed it during the crisis.<sup>4</sup> In the period up to 28<sup>th</sup> December 2020 20 officers died, with COVID being recorded as being involved in the death.<sup>5</sup>

3.1.3 During this period officers have had to deal with many legislative changes. In fact, it has been reported (the Guardian, 12th January 2021)<sup>6</sup> that there have been 64 legislative changes since last March, meaning officers have faced getting up to

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<sup>3</sup> Quarterly COVID report, (April-August COVID data); Chandler, N. PFEW Research and Policy department, R022/2020

<sup>4</sup> Pay and Morale Survey 2020 COVID-19; Chandler, N.; R073/2020

<sup>5</sup> (COVID-19) related deaths by occupation, England and Wales: deaths registered between 9 March and 28 December; Office for National Statistics Coronavirus; 25<sup>th</sup> January 2021 <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/causesofdeath/bulletins/coronaviruscovid19relateddeathsbyoccupationenglandandwales/latest>

<sup>6</sup> <https://www.theguardian.com/world/2021/jan/12/england-covid-lockdown-rules-have-changed-64-times-says-barrister>

speed with changes an average of every four and a half days. Officers have had to understand and adhere to rapidly evolving guidance provided by the College of Policing, while at the same time exercising discretion (and applying a high degree of emotional intelligence) in order to deal with confused and anxious members of the public. Throughout, there has been a high degree of media and public scrutiny, and officers have taken the brunt of press and public frustration at times when laws have been unclear or ambiguous.

3.1.4 Data from our Pay and Morale survey<sup>7</sup> (conducted in August) shows how these rapid changes were experienced by officers. While most felt their force had kept them up to date on COVID guidance (78%), only 49% of officers felt their force had managed officers well, and only 41% felt they had received adequate training on the COVID crisis, meaning that officers were under pressure to work out for themselves how best to deal with the situation.

3.1.5 To further assess the impact on our members we included a number of questions in our Demand, Capacity and Welfare survey, run in October-November 2020.<sup>8</sup> The responses suggest that officers are being exposed to a level of risk and attack never seen before.

3.1.6 The weaponization of COVID has been shocking: nearly one third of our members (32%) reported that a member of the public believed to be carrying COVID-19 had threatened they would attempt to infect them with the virus, often by coughing on them.

*“A suspect who was believed to have COVID-19 (his family had tested positive) deliberately spat a mouthful of juice in my face whilst in custody and said he hoped that I died” Constable, 10 years’ service.*

3.1.7 Because of COVID, officers have dealt with distressing tasks on a level far in excess of that previously. Moreover, the nature of the pandemic makes these tasks dangerous too. 28% of our members had been performing duties that were specific to COVID.

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<sup>7</sup> Pay and Morale Survey 2020 – COVID 19, Nov 2020; PFEW Research and Policy Department; Chandler, N. R073/2020

<sup>8</sup> Demand, Capacity and Welfare Survey 2020 Headline report: PRRB December 2020; PFEW Research and Policy Department; Elliott-Davies, M. R095/2020

*“I was posted to a COVID response team for 2 months, attending to those that had died and suspected to be COVID related. Wrapping bodies for the undertaker to remove”. Constable, 25 years’ service.*

*“Welfare checks on COVID positive patients who have been released to their homes from hospital and have become uncontactable. Face masks and thin plastic pinny was the only issued kit”. Constable, 7 years’ service.*

- 3.1.8 Being a police officer always impacts on the officer’s family, but during COVID this has had even harsher consequences:

*“Right at the start my father was in a care home in his final weeks of life. Visits were restricted and I was booked to go and see him .... The night before a prisoner came into custody who we were dealing with - she stated she had COVID and was coughing all over the place. It turned out she did not have it - but I was distraught that I probably could not visit my dying father because of her lies - and they were lies.” Sergeant, 18 years’ service.*

*“I attended a sudden death at a care home at the start of the pandemic where advice from HQ was not to wear PPE unless it was a confirmed or suspected COVID death. I therefore wore no mask, and gloves only, hand sanitising on entry and exit of the building”. The officer then tested positive for COVID, and passed it to his family. “The advice has now changed...different advice could have protected my family and I”. Constable, 5 years’ service.*

- 3.1.9 Further, a number of officers reported that they are having to deal with an increase in calls to people in crisis of having mental health issues.

*“Since March my team and I have seen a huge increase in self harm and suicide calls. Between April and July it felt like there was a suicide per set of shifts. I can personally count as having gone to 5 or more in that period. One in particular was a male who put a high velocity rifle to his head. There have been numerous hangings and due to working in a coastal area, there have also been several bodies recovered from the cliffs or sea.” Sergeant, 19 years’ service.*

- 3.1.10 Throughout, officers have had rest days cancelled and worked extra hours. 63% reported that they had had a request for leave refused more than once, while others stated that they had not bothered to ask for leave, knowing it would be impossible. Only 14% of officers indicated that they believed that there were enough officers to manage the demands being made on them as a team. Worryingly, 77% of

respondents said they had suffered difficulties with their mental health over the last 12 months.

## 3.2 The inherent danger of the role

- 3.2.1 Whilst this year has thrown up unprecedented challenges for officers and the public, it must be remembered that even in the best of times officers fulfil a dangerous role. Some further findings from our Demand, Capacity and Welfare report serve to shine a light on the challenges officers face.
- 3.2.2 83% of officers in front-line roles (response, neighbourhood policing, custody and roads) were the victim of an unarmed attack within the last 12 months.
- 3.2.3 In the last year 24% of roads policing officers have had a vehicle used to attack them (9% more than twice). This included being driven at, and / or being purposely knocked down by a vehicle. 17% of roads policing officers have been injured while attempting to get a member of the public out of a vehicle.
- 3.2.4 60% of respondents reported that their ongoing workload was too high. 8% of officers said their average shift lasted longer than the ten hour maximum suggested by the Home Office. A number of officers reported that minimum staffing levels were being adjusted so that forces seemed to meet targets.

*“The minimum staffing levels have been adjusted to match the current staff number, not because it is an adequate number”. Constable, 9 years’ service.*

## 3.3 Pay and morale survey

- 3.3.1 In our yearly Pay and Morale survey we asked officers some specific questions about the effect of COVID, and how this had caused them to think about their pay and morale. 65% of respondents said COVID had had a negative effect on their morale. More than three quarters (76%) said that they were unfairly paid for the risks and responsibilities of their job during COVID. This was, of course, before the government announcement that officers would receive no pay increase this coming year.<sup>9</sup> It is highly likely that this announcement will have increased the numbers who feel their pay is not fair.

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<sup>9</sup> Pay and Morale Survey 2020 – COVID 19, Nov 2020; PFEW Research and Policy Department; Chandler, N. R073/2020

3.3.2 As for the general pay questions that we ask year on year,<sup>10</sup> to track change over time, 86% of respondents said they do not feel fairly paid for the stresses and strains of their job, while only 18% were satisfied with their basic pay. 77% do not feel fairly paid considering the hazards faced in the job, and 74% don't feel fairly rewarded for the responsibilities undertaken. Only 10% agree that the pay is fair compared to employees doing similar work in other organisations.

### **Attitudes to recruitment and retention**

3.3.3 Given the PRRB's standing remit on recruitment and retention, we invite the PRRB to consider some of our survey findings that we believe suggest that recruitment and retention are likely to be challenging for policing in the years to come.

3.3.4 The factor most likely to have a negative effect on officers' morale is how the police are treated, with 90% saying this was the case. This is an increase since last year, and likely due to the issues reported above, with some members of both the press and public treating officers badly during the pandemic. 59% of respondents would not recommend to others that they join the police.<sup>11</sup>

### **3.4 Current officer numbers and 20,000 uplift**

3.4.1 We wrote last year about our concerns about forces' ability to recruit the numbers required for the uplift of 20,000 officers in a relatively short period. We do not intend to repeat that information again: however, the COVID situation has only served to increase these concerns.

3.4.2 In response to our Pay and Morale survey<sup>12</sup> only 33% felt their force would be able to recruit the required number of new officers. Only 7% said they believed their force would have the necessary numbers of Tutor Constables to train new recruits. 45% felt their force would not have enough Sergeants and line managers. One respondent to the Demand and Capacity survey pointed out that even when minimum staffing levels have been met:

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<sup>10</sup> Pay and Morale Survey 2020 – Attitudes Towards Pay, Nov 2020; PFEW Research and Policy Department; Chandler, N. R075/2020

<sup>11</sup> Pay and Morale Survey 2020 – Morale and Engagement, Nov 2020; PFEW Research and Policy Department; Chandler, N. R070/2020

<sup>12</sup> Pay and Morale Survey 2020 – Officer Uplift, Nov 2020; PFEW Research and Policy Department; Chandler, N. R074/2020

*“A lot of us are students so although there are a fair few officers on the shift the experience levels vary a lot”. Constable, 1 years’ service.*

- 3.4.3 As for the attitudes of new recruits themselves, 92% were proud to be in the police, but worryingly of those with less than a year in service only 54% felt valued in the police.
- 3.4.4 Whilst it might be expected that the uplift would have provided a huge morale boost to officers, given that it is intended to alleviate some of the pressure caused by the reduction in numbers over many years, only 25% of officers said it had had a positive effect on morale, and 64% said it had had no impact at all. These figures are likely explained by the concerns expressed about the readiness of forces to incorporate and manage new recruits in the timescales required.

### **20,000 Uplift: Pressure on Sergeants**

- 3.4.5 In our submission last year we raised the issue that the pressure on Sergeants would be significant, following the recruitment of large numbers of new Constables. For that reason we asked some questions specifically about Sergeants in this year’s Demand Capacity and Welfare survey.<sup>13</sup> Only 15% said their force would have enough Sergeants to supervise all the new officers being recruited. On average, Sergeants reported having direct line management for 6 Constables, but having responsibility for 8 officers during a typical shift. 32% of Sergeants believe the average number of Constables they manage on a shift will increase due to the Uplift programme, and 54% of these say it is unlikely (or extremely unlikely) they will have enough time and resources to manage this increase in responsibilities.
- 3.4.6 Sergeants were concerned both about the sheer numbers they were being asked to manage, and about the impact of having so many inexperienced people in their teams. 1,246 Sergeants left comments in an open text box to tell us about the impact the Uplift programme might have on their rank. (We had 2,527 Sergeants respond to the survey: the fact that nearly 50% felt strongly enough to leave comments is itself indicative of the strength of feeling here).

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<sup>13</sup> Demand, Capacity and Welfare Survey 2020 The Officer Uplift and Sergeant Impacts; PFEW Research and Policy Department; Elliott-Davies, M. R097/2020

*“A few years ago, Response Sergeants were a 1:7 ratio, now they're 1:10, this will only increase with the uplift. There will need to be more sergeants as 1:10 is already too many.” Sergeant, 11 years' service*

*“A greater demand on Sergeants to act as development officers for young in-service PCs [Police Constables]. My team has gone from being 30% student officers a year ago to 60% now. There are less PCs around with experience and the officers coming through are receiving less initial training meaning there is an ever-increasing demand on supervisors to fill this gap in training and experience.” Sergeant, 14 years' service*

*“We don't have the time to train and mentor new officers. Their foundation training is not good enough, even worse now with COVID. Probationers are left to train other probationers. We can't effectively supervise the officers we already have.” Sergeant, 7 years' service*

*“Current new officers joining my teams have very little training - e.g. 1 hour's total ELS [Emergency life support] training, lack of knowledge of law and procedures leading to numerous near misses and requiring intensive close supervision”  
Sergeant, 21 years' service*

*“Trying to find suitable tutor constables is a real issue. Currently 75% of my shift have less than 3 years' service. It is not safe or healthy to have such inexperience.”  
Sergeant, 35 years' service*

*“There are so many probationers that come into custody with prisoners and they don't have the support of an experienced officer. It raises risk in custody” Sergeant, 22 years' service*

*“The uplift of new officers needed a raft of measures to support it, especially from our training dept; there have been none. This additional workload may break some of my fellow supervisors, or they will stop giving a damn” Sergeant, 18 years' service*

## 3.5 Affordability

3.5.1 The issue of affordability in the public sector is complex, and valid perspectives include whether a pay increase is affordable within the amount already budgeted by Chief Constables, and whether it is affordable within the constraints of changing public expenditure. It is acknowledged that the level of public sector spending in this last year was unforeseen, and at unprecedented levels. Unlike the private sector, in the public sector a third perspective is raised by government in considering expenditure, and that is whether increases in public sector pay – whether affordable or not – are in step with those in the private sector. That is the focus of this year’s remit letter.

### Existing Police budgets

- 3.5.2 Each year policing budgets are settled before the pay round. As an example, last year the Home Office reported in its submission to the PRRB the 2020/2021 (published on 12<sup>th</sup> March 2020) that the total pay bill (including basic pay and allowances) was £6.5 billion, and that increases of £150-£160 million were affordable.<sup>14</sup> We are aware that Chief Constables had budgeted for an increase in this coming year, and that they normally have discretion over how they spend the money allocated to them.
- 3.5.3 In the Spending Review on 25<sup>th</sup> November 2020 the government announced that officers would suffer a pay “pause”. Yet at the same time, forces were given an extra £400 million for the Uplift programme to ensure that the uplift does not squeeze existing budgets, and Police and Crime Commissioners were allowed to increase their budgets with an extra £15 per band D property bringing in an additional £320 million this year.
- 3.5.4 We have calculated the cost of an uplift to the existing basic pay only. We have based figures on existing officer numbers, as the new £400 million for the uplift programme will cover these. We have also excluded allowances, as the government’s rationale for the pay pause refers only to the comparison of basic pay to private sector pay. The costs of an uplift would be as follows:
- 1% would cost £46,038,881

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<sup>14</sup> Home Office evidence to the Police Remuneration Review Body 2020/21 pay round; 12 March 2020. (Para 36).

- 2% would cost £92,077,762
- 3% would cost £138,116,644

3.5.5 The Spending Review allocated ample money for the pay bill for new recruits, and still another £320 million new funding available for Chief Constables – more than double the amount that the Home Office said last year would be available for a pay uplift. Last year officers received 2.5%. Officers can rightfully ask why it is that this year some of the £320 million extra funding cannot be spent on pay?

3.5.6 Meanwhile Chief Constables are having their hands tied, and prevented from choosing to spend this budget in a way that would improve the morale of a workforce who have risen to the year's challenges in an exemplary manner. Notably the Treasurer has chosen to insist that there be no uplift in spite of the fact that the Spending Review allocated money to forces. The PRRB has been prevented from having these data presented for its consideration.

3.5.7 We believe it would have been appropriate to run the process as usual, with the PRRB taking evidence on affordability from all parties. We would like to have heard from Chief Constables as to whether the budget they were allocated in the November Spending Review would have allowed them as the employer to reward their officers with an uplift.

3.5.8 We believe that it is fair to say that the choice to deny officers this available money is a political one, rather than an economic one.

### **Wider UK public spending, and the budget deficit**

3.5.9 We understand that the events of the last year have damaged the economy. The Office for Budget Responsibility (OBR) forecast a UK budgetary deficit of £394 billion in 2020/21.<sup>15</sup> This is equivalent to 19% of GDP, the highest level since 1944/45. Of this, around £279 billion is attributable to measures related to coronavirus, including £53.7 billion to the Coronavirus job retention scheme, and £19.6 billion to the self-employed income support scheme: £73.3 billion in total on employment support alone. The national debt is running at around 105% of GDP: over £2 trillion.

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<sup>15</sup> Economic and Fiscal Outlook – November 2020; Office for Budgetary Responsibility.

3.5.10 It would be understandable if, in this context, the government were to try to tighten up on spending in any way it can, in order to try to avoid further deficit. However, if this is the case, then firstly it would be better to be clear about this, rather than using the argument in the remit letter that public sector pay needs to be constrained because it will become out of kilter with private sector; and secondly, moreover, any small savings made by refusing officers a pay increase are so small as to be inconsequential.

3.5.11 In the following table we describe the costs of an increase to the police pay bill as a proportion of the costs of various virus-related support measures.<sup>16</sup>

*Table 1 Cost of pay increases as % of virus related measures in year.*

| Measure                                | Net cost 2020-2021 | Pay bill figures as percentage of the cost of each measure |                   |                   |                   |
|--|--------------------|--|-------------------|-------------------|-------------------|
|  |                    | Whole basic pay bill for policing                          | Cost of 1% uplift | Cost of 2% uplift | Cost of 3% uplift |
| Overall virus related support measures | £279,976,076,917   | 1.64%  | 0.02%             | 0.03%             | 0.05%             |
| Employment support measures            | £73,323,033,224    | 6.28%  | 0.06%             | 0.13%             | 0.19%             |

3.5.12 No one would argue that the £73.3 billion spent on employment measures was not vital for families who have suffered terrible financial losses. Only that the costs of providing a pay uplift for officers is, by comparison, a drop in the ocean. A 1% uplift would cost only 0.02% of the cost of expenditure on virus related measures. Denying officers this uplift serves no real purpose in economic terms, but could have significant negative impacts on morale and on the future ability to recruit and retain officers.

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<sup>16</sup> Estimating the projected cost of pay rises and comparing these to key fiscal indicators; Ferrer, R.; R048/2021

## **Public / private salary increases**

3.5.13 The remit letter this year states that:

*“Covid-19 ...has suppressed earnings growth and increased redundancies in the private sector. Public sector pay has been shielded from the pandemic’s economic effects....If we continued with rises across the board, the existing gap between public sector reward and the private sector would widen significantly”.*

3.5.14 The idea that suppressing public sector pay is in order to prevent a gap with private sector workers does not bear scrutiny, for three main reasons.

3.5.15 First, as our benchmarking work presented in Chapter 4 shows, public sector workers are not already paid more than those in comparable jobs in the private sector. In fact, many officers earn only around 4/5 of the salary of roles of equal level.

3.5.16 Second, not all public sector workers are being denied a pay rise: in fact, the biggest single group of public sector workers will receive an uplift. NHS workers – alone of all public sector workers – will receive rises this year. To be clear, we are pleased that they will. We believe they are thoroughly deserving of this. But the fact that there are over one million NHS workers receiving an uplift means that denying the same to a relatively small workforce – only 130,000 officers – and arguing that this will prevent the growth of a public / private sector gap, makes no mathematical sense.

3.5.17 Third, the impact on the private sector has been uneven, with many who were in “key worker” roles during the pandemic being rewarded for this. While the tourism and leisure sectors have suffered catastrophic losses, supermarkets and food suppliers have seen growth. During the summer the whole economy bounced back relatively quickly, for a period.

3.5.18 The Labour Research Department 2019-2020 Pay Survey covers the year up to the end of July 2020.<sup>17</sup> Six hundred and twenty nine pay settlements were included, with 74% of these being in the private sector. The truth is that COVID had a very uneven impact on pay.

3.5.19 Whilst it is true that redundancies are high, and pay has been suppressed in places, workers in some sectors achieved good increases, especially where they were key

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<sup>17</sup> Labour Research Department 2019-2020 Pay Survey  
<http://www.lrd.org.uk/payline/supplement/LRDPaySurvey2020Printable.pdf>

workers during the pandemic (e.g. the food industry). The median increase in the private sector was 2.5%, with a number of examples of these agreements being reached after April 2020. In short, the private sector has reacted to the pandemic as one might expect, with many workers being rewarded for their continued contributions during the pandemic.

3.5.20 Indeed, in an attempt to recognise the value of their workers' contributions during COVID a range of private sector employers paid "thank you" payments to staff. There were 10% bonuses or enhancements at a number of retailers (including Argos, B&M Heron Foods, Ocado, Sainsbury's and Tesco); Asda and some Co-op stores paid an extra week's pay; and Morrisons paid a 6% quarterly bonus worth around £1,050 for full-time staff.

3.5.21 The private sector, then, has rewarded those whose work was most necessary during this period. This is exactly what one might expect from the private sector, with wages being driven by demand. Additionally, the government has provided a safety net for those unable to work in their normal roles. However, in the public sector, the increased demands on officers in particular are not being rewarded.

3.5.22 We believe that the Spending Review provided sufficient funding for officers to receive a pay uplift of 3% this year, which would cost £138,116,644 in addition to current basic salaries. We believe that there is scope to also increase allowances by the same amount: but a pay uplift across the board is our priority.

3.5.23 Further, we believe that officers should expect a thank you payment in the same way that key workers in industry have received such a payment. There is scope in regulations: bonus payments, of between £50 and £500, are payable to any officer where the chief officer judges a piece of work by a member to be of an outstandingly demanding, unpleasant or important nature. (Reg 34, annex U, para 8). There is some good practice in this area: for example, we are aware that Special Constables in Devon and Cornwall who are receiving a £750 bonus for the COVID response.

*Recommendation 1 An uplift of 3% should be awarded to all officers*

*Recommendation 2 Existing regulations (Reg 34, annex U) regarding bonuses should be used to ensure all officers are given a thank you payment for the COVID response.*

## **4 Chapter 4 Remit letter topics**

### **4.1 Ongoing work, outside the remit letter**

- 4.1.1 We have worked closely with the National Police Chiefs' Council National Reward Team (NRT) since March, to try to resolve a number of issues pertaining to the nature of officers' pay and conditions. These have included working through the detail of measures to try and ensure recruitment and retention of officers (including pensions issues relating to re-employment of retired officers), working through overarching legislative changes caused by COVID (such as the changes to the Working Time Regulations regarding the carry over of leave), and developing guidance for matters such as officers being thought to be at higher risk (e.g. pregnant officers) being able to work from home. In many cases we have been able to reach agreement and provide guidance to forces that helps give clarity and fairness. Much of this work has been undertaken under the auspices of the Police Consultative Forum, via both formal and informal meetings.
- 4.1.2 However, government departments have largely remained outside of these discussions. We understand the pressures on government departments at this time. In some cases (such as regarding the abatement of pensions) informed discussion has been held at the Scheme Advisory Board, where the APCC, NPCC, and staff associations have devoted considerable time and energy in trying to resolve a matter that has a direct and measurable consequence in terms of officer re-employment. We have been in broad agreement: but we are unable to make the changes required to support recruitment of retired officers without Treasury action.
- 4.1.3 In short, both the National Reward Team and the staff associations have been dealing with issues that were largely unexpected, but became priorities in year. Progress towards pay reform has therefore been perhaps less speedy than some would wish. But it must be clear that this was due to a combination of circumstances, including COVID, and that the NRT and staff associations have devoted considerable resources to trying to support officers with appropriate pay and conditions.
- 4.1.4 The Police Consultative Forum has benefited greatly from having a Chair, Elizabeth France, and we trust that her successor will be able to carry on this work.
- 4.1.5 Aside from COVID, the biggest single barrier to pay reform has, in fact, been a lack of funding. In other parts of the public sector, such as health and teaching, pay reform has been accompanied by investment in the overall package. Yet in policing

there appears to be an expectation that reform can be enacted without providing Chief Constables with the money needed for incentivisation. It is against this backdrop that progress towards the Pay Progression Standard, benchmarking, the P factor, and Targeted Variable Payments has to be considered.

## **4.2 Those earning under £24,000**

- 4.2.1 The remit letter seeks a view on how to pay those currently earning under £24,000 the £250 increase allotted in the Spending Review, without causing leapfrogging.
- 4.2.2 There are 2 pay points below £24,000. These are pay point -1 (£18,912) and pay point 0 (£21,402). The number of officers on these two pay points is not transparent. We have access to pay census data from 2019, but the number of officers recruited last year under the Uplift programme means that the census data we have is out of date.
- 4.2.3 From April 2021 the National Living Wage is £8.91 per hour. An officer at the lowest pay point of -1 earns just 18 pence above that: £9.09 per hour. (If we take the P factor away, then the amount of these officers' pay that we use to compare to other roles is actually just £7.90, well below the National Living Wage).
- 4.2.4 Last year we argued that both these pay points should be removed, as being uncompetitive and unfair. We believe that the easiest way for government to provide these officers with the uplift set out in the Spending Review would be to simply remove these two pay points, and move all officers to pay point 1, which is £24,780. This would prevent any leapfrogging, and would take away the need to make any changes to regulations. Given that last year's uplifts (which took effect on 1<sup>st</sup> September 2020) have still not been consulted on or incorporated in regulations, we are concerned that any method of implementation that would require new pay points to be created would cause a burden on the Home Office. We do not believe the costs of simple removal of two pay points would be prohibitive.

*Recommendation 3 Pay points -1 and 0 should be removed.*

## **4.3 The Pay Progression Standard**

- 4.3.1 There has been broad agreement over the principles of the Pay Progression Standard for some time now. The system proposed means that officers will be entitled to progress up the pay scales so long as their Performance Development Review confirms they are competent, and they are not already subject to Unsatisfactory Performance Procedures (UPP). As we noted last year in our

submission to you (para 4.4.21) “the staff associations have always acknowledged that officers who are not meeting the basic standards of performance and are on Unsatisfactory Performance Procedures should not receive incremental awards”. There has been a proposal based on extending this to include unsatisfactory attendance too: but we are not convinced this could be achieved without creating discrimination against disabled officers. The NRT have also proposed that officers would need to have undertaken mandatory training in order to progress, and that officers with line management responsibilities should have completed the PDRs for their appraisees. We have no objections in principle to these, but there are some practical considerations (such as what training forces suggest is mandated, and whether officers are actually able to access this) that must be taken into account. We are happy to engage with the NRT further on this detail of implementation.

### **Practical barriers**

- 4.3.2 Last year the PRRB invited all parties to comment on force readiness for change. We pointed out then that several forces do not have PDR systems in place. This year, as in last, we have found via our Pay and Morale survey that there are considerable gaps. Even where respondents said their force had a PDR process, almost 1/3 (31.6%) said they had not had a PDR in the last 12 months. In better forces (e.g. Gwent) just 5.7% of respondents had not had a PDR in this period. But in the worst performing a staggering 4/5 of respondents had had no PDR (West Midlands, 79.7%).<sup>18</sup> Whilst we appreciate that it might be argued that COVID could have had an impact on whether PDRs were completed, the proportion of officers who have not had a PDR this year did not change considerably (in 2018 it was 28.8% compared to 31.4% in this last year).
- 4.3.3 Further, whilst no one argues against the introduction of a PPS based on UPP where there is genuine unsatisfactory performance, worryingly we have found significant differences between the numbers of females going through UPP compared to males, and the number of BAME candidates compared to white: (2.0% compared to 1.5%, and 2.9% compared to 1.6%). We believe that the reasons for these findings will need to be considered carefully in progressing the PPS, and a full EIA is awaited.

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<sup>18</sup> Pay and Morale Survey – Pay Reform Data Report November 2020; Boag-Munroe, F.; R078/2020.

4.3.4 Finally, another barrier is the speed with which the Home Office is able to enact change. Unfortunately there is now something of a backlog of legislative changes required to Police Regulations: for example, the amendments needed due to the Children and Families Act 2014 have not yet been made; nor have last year's pay uplifts been included in regulations yet. In our submission last year we responded to PRRB concerns about the length of time taken to enact changes in regulations. This formed section 4.5 of our submission dated 7<sup>th</sup> February 2020: very little has changed since.

4.3.5 In summary, the current status with regard to the PPS is that while there is broad agreement in principle, practical barriers remain.

## 4.4 The P factor: method of use, and valuation

### Method of use

- 4.4.1 Last year in our submission we supported the NPCC's intention to separate out the component of pay known as the P factor for benchmarking purposes, and to use only the balance of pay remaining for comparison. We said that the "sequence should be to first determine the size of the P factor, then subtract that from current pay, and compare the value that is left to appropriate comparators". (Para 3.3.3).<sup>19</sup> We are pleased that the NPCC NRT are also advocating this sequence, and in their draft PRRB submission documents supplied to us on 11<sup>th</sup> January 2021 have noted "for the purposes of benchmarking the 'salary' figure used for comparison purposes would be base salary minus the notional value attributed to the P Factor". The NRT have also stated that "for the purposes of benchmarking the 'salary' figure used for comparison purposes would be base salary minus the notional value attributed to the P Factor. Purely as an example, and assuming a notional value for the P Factor is the proposed 13%, the salary used for a top of scale Constable for benchmarking purposes would, therefore, be £35,784 (£ 41,130 - 13%)". We agree this method.
- 4.4.2 In our benchmarking work, therefore, we have followed this agreed process.

### Valuation

- 4.4.3 Over the last few years we have been discussing both the content and valuation of the P factor. NPCC originally proposed setting the P factor at the value of the X factor (set by Winsor), which of course only acknowledged the dangerous aspect of the role, and not the other unique factors. Last year we noted that the NRT had moved from their original statement and increased their valuation to 12%. At that time we stated that the argument for 12% was not persuasive, and sought for an independent valuation. In absence of that, we sought for a valuation of 14.5%.
- 4.4.4 In the time since, we have worked with the NRT to arrive at an agreed valuation. We are grateful to the NRT for sight of the work that Korn Ferry have done on their behalf, both to fine tune the definitions of the P factor, and to independently assure that there is no "double counting" on the constructs stipulated within the definition, in the benchmarking methodology.

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<sup>19</sup> Submission to the Police Remuneration and Review Body, on behalf of the PFEW and PSA, 7<sup>th</sup> Feb 2020; prepared by the PFEW Research and Policy department.

4.4.5 The NRT and the staff associations have agreed, on the basis of work done in year, that the appropriate valuation of the P factor is 13%. This is calculated as being for each pay point up to Constable pay point 7, where it is capped. Hence the NRT and staff associations agree that the value should be set at a maximum of £5,347. This represents 13% of a Constable's base pay at pay point 7, £41,130.

4.4.6 We therefore agree that the P factor for each rank and pay point, and the element of officers' salaries that should be used for comparison is as set out in the table below (which is provided by the National Reward Team).

*Table 2 P Factor calculations (NRT provided data)*

| Federated ranks  | Pay point | Full salary from September 2020 | P factor | Element of basic salary after P factor (and therefore used for comparison to benchmark data) |
|------------------|-----------|---------------------------------|----------|--|
| PCDA             | -1        | £18,912                         | £2,459   | £16,453  |
| PCDA / Constable | 0         | £21,402                         | £2,782   | £18,620  |
| PCDA / Constable | 1         | £24,780                         | £3,221   | £21,559  |
| Constable        | 2         | £25,902                         | £3,367   | £22,535  |
|                  | 3         | £27,030                         | £3,514   | £23,516  |
|                  | 4         | £28,158                         | £3,661   | £24,497  |
|                  | 5         | £30,411                         | £3,953   | £26,458  |
|                  | 6         | £34,950                         | £4,544   | £30,407  |
|                  | 7         | £41,130                         | £5,347   | £35,783  |
| Sergeant         | 2         | £43,965                         | £5,347   | £38,618  |
|                  | 3         | £44,901                         | £5,347   | £39,554  |
|                  | 4         | £46,227                         | £5,347   | £40,880  |
| Inspector        | 0         | £52,698                         | £5,347   | £47,351  |
|                  | 1         | £54,186                         | £5,347   | £48,839  |
|                  | 2         | £55,671                         | £5,347   | £50,324  |
|                  | 3         | £57,162                         | £5,347   | £51,815  |
| Chief Inspector  | 1         | £58,332                         | £5,347   | £52,985  |
|                  | 2         | £59,502                         | £5,347   | £54,155  |
|                  | 3         | £60,732                         | £5,347   | £55,385  |

## 4.5 Benchmarking

4.5.1 The staff associations have always agreed that the benchmarking of pay is a useful way to start to attain pay that is fair by comparison to others. That is the reason why we believe that choosing appropriate comparators based on levels and adjusting for the unique nature of the job – the P factor – is crucial.

4.5.2 We understand that in this year the PRRB are hampered by the Spending Review, in which government choose to make no money available for an uplift. Nonetheless we agree the NPCC position, which is to use benchmarking as follows:

*“The use of benchmarking data by the NPCC is for the purposes of:*

- *monitoring ongoing relative changes in competitiveness, with a view of encouraging recruitment, motivation and retention. This will contribute to forward planning, in both seeking to alleviate and anticipating current and future issues. It will show how an annual uplift will impact each officer.*
- *providing evidence to support any significant changes to base pay and allowances in terms of either the structure or levels of reward in addition to the annual pay uplift. Where the NPCC wishes to make changes to the level of base pay or an allowance then the value of the change will be referenced to benchmarking data. An example would be the removal of the first pay point for Sergeants, wef September 2020. In this case the data showed that removal of the initial pay point would not be unreasonable.*

4.5.3 Having agreed a process with the NPCC, we remain concerned that the choice of a comparator group and / or database is crucial. In discussions with the NRT’s own independent consultants, Korn Ferry, we collectively agreed that it is a useful exercise to use more than one database for comparison, to allow some element of verification of results. We therefore used the same database that we chose last year, the IDR online Pay Benchmarker, to undertake comparisons. As last year, we do not suggest that these data provide a definitive comparison: but rather we add them to help inform and round out the debate. We are highly aware that the government has chosen not to make any funds available in this year to bring officers closer to where they should be if the results of the benchmarking exercise were to be actioned.

- 4.5.4 As last year, we believe that there is a need to consider setting out inclusion and exclusion criteria for the benchmarking exercise. While the P factor adjustment allows us to take account of the dangerous nature of policing, for example, there are a number of features that are not adjusted for, when the benchmarks chosen are broad, as in both the Korn Ferry and IDR databases. For example, we do not believe that the current benchmarking takes account of some job features such as shift work. This means that officers are being compared to roles that do not have the same level of disruption, and therefore would not be expected to have a premium that should be added for such activity. The net effect will be to make officers' roles seem better remunerated, by comparison, than they are.
- 4.5.5 We have not been able to account for all such features of the job this year, but in the time available this year we have taken account of one further feature that is not encompassed in the P factor, this being hours worked. Officers work 40 hours per week. By contrast, most roles in the IDR database work 38 hours. We therefore adjusted the comparator pay to calculate what it would be if incumbents worked 40 hours, in order to compare that figure to the officer pay (minus the P factor). We did this for Constables and Sergeants, but not for ranks above this, as Inspector and above are expected to work the hours required, rather than earning overtime above 40 hours each week.
- 4.5.6 In all cases we used the level that IDR had assigned for officers of that rank. This means that the levelling exercise was done independently of the staff associations. We did not compare every single pay point, but rather used the top and bottom of the scale for each rank, and some additional points for Constables.

Table 3 Officer pay compared to IDR comparators: officer pay as percentage of comparator pay

| Federated ranks  | Pay pt | Full salary from Sept 2020 | P factor | Comparable element of Police basic salary after P factor <sup>20</sup> | IDR level | IDR benchmark at 38 hours | Comparable Police hourly rate <sup>21</sup>  | IDR hourly rate | Officer pay as % of comparator |     |
|------------------|--------|----------------------------|----------|--|-----------|---------------------------|--|-----------------|--------------------------------|-----|
| PCDA             | -1     | £18,912                    | £2,459   | £16,453  | 4         | £19,265                   | £7.90  | £9.74           | 81%                            |     |
| PCDA / Constable | 0      | £21,402                    | £2,782   | £18,620  |           | £19,265                   | £8.95  | £9.74           | 92%                            |     |
| PCDA / Constable | 1      | £24,780                    | £3,221   | £21,559  |           | £19,265                   | £10.38   | £9.74           | 107%                           |     |
| Constable        | 2      | £25,902                    | £3,367   | £22,535  |           |                           |  |                 |                                |     |
|                  | 3      | £27,030                    | £3,514   | £23,516  |           |                           |  |                 |                                |     |
|                  | 4      | £28,158                    | £3,661   | £24,497  | 5         | £29,226                   | £11.78   | £14.79          | 80%                            |     |
|                  | 5      | £30,411                    | £3,953   | £26,458  |           |                           |  |                 |                                |     |
|                  | 6      | £34,950                    | £4,544   | £30,407  | 6         | £34,935                   | £14.63   | £18.16          | 81%                            |     |
|                  | 7      | £41,130                    | £5,347   | £35,783  | 6         | £34,935                   | £17.20   | £18.16          | 95%                            |     |
| Sergeant         | 2      | £43,965                    | £5,347   | £38,618  | 7         | £44,026                   | £18.58   | £22.89          | 81%                            |     |
|                  | 3      | £44,901                    | £5,347   | £39,554  |           |                           |  |                 |                                |     |
|                  | 4      | £46,227                    | £5,347   | £40,880  | 7         | £44,026                   | £19.65   | £22.89          | 86%                            |     |
| Inspector        | 0      | £52,698                    | £5,347   | £47,351  | 8         | £58,452                   | Not adjusted for hourly rate, as Inspector and above do not work standard 40 hour week, but rather hours required. |                 | 81%                            |     |
|                  | 1      | £54,186                    | £5,347   | £48,839  |           |                           |  |                 |                                |     |
|                  | 2      | £55,671                    | £5,347   | £50,324  |           |                           |  |                 |                                |     |
|                  | 3      | £57,162                    | £5,347   | £51,815  | 8         | £58,452                   |  |                 | 89%                            |     |
| Chief Inspector  | 1      | £58,332                    | £5,347   | £52,985  | 8         | £58,452                   |  |                 |                                | 91% |
|                  | 2      | £59,502                    | £5,347   | £54,155  |           |                           |  |                 |                                |     |
|                  | 3      | £60,732                    | £5,347   | £55,385  | 8         | £58,452                   |  |                 |                                | 95% |

<sup>20</sup> This is, by agreement with the NRT, the part of salary that is used for comparison to benchmark data.

<sup>21</sup> This is the officer hourly rate after the P factor has been removed.

- 4.5.7 The table above demonstrates that in almost every case, even at the top of pay scales for each rank, officers are paid less than counterparts.
- 4.5.8 The only exception is Constables at pay point 1. However, it is worth noting that in this case we have used a comparator from the IDR database that reflects Degree Apprenticeships in other organisations where the apprentices may be in year 1 or 2 of their apprenticeship, whereas in the case of officers, those on pay point 1 may well be 2 years plus into their apprenticeship, and will certainly already be undertaking the duties of a sworn Constable.
- 4.5.9 Last year the lowest point on the Sergeants' pay scale was removed, as it was not considered competitive enough. Yet even with this measure, both Sergeants on promotion and Inspectors on promotion earn only 4/5 of what their counterparts in comparator roles earn.
- 4.5.10 As the NPCC say, the aim of benchmarking is *"providing evidence to support any significant changes to base pay and allowances in terms of either the structure or levels of reward in addition to the annual pay uplift"*. We believe that the table above demonstrates that significant changes are needed, to make officer pay competitive.
- 4.5.11 In order to calculate what we believe would be more competitive levels of pay we calculated the value that comparator pay would be if in fact comparators worked 40 hours per week (instead of the average 38). We then added the equivalent of 13% (the P factor) on top, as comparators do not undertake duties commensurate with the P factor, and it therefore isn't already included in their pay. For all ranks above Constable we calculated the P factor as being 13% of the new adjusted top of the Constable pay, which is £6,025. As IDR have judged all pay points within ranks to be at the same level (e.g. all Sergeants at level 7, and both Inspectors and Chief Inspectors all at level 8) we have calculated a single figure for these ranks.

*Table 4 Competitive pay (expressed as comparator pay adjusted to 40 hours, plus P factor at 13%)*

| Federated ranks | Pay point                    | IDR level | IDR comparator salaries, adjusted to 40 hour equivalent | Competitive police salary <sup>22</sup> |
|-----------------|------------------------------|-----------|---|---|
| PCDA            | Bottom of scale, pp -1 and 0 | 4         | £20,279   | £22,915                                 |
| Constables      | Mid scale, pp 4              | 5         | £30,764   | £34,764                                 |
|                 | Top of scale, pp 6 and 7     | 6         | £36,774   | £41,554                                 |
| Sergeant        | All current pay pts          | 7         | £46,343   | £51,745                                 |
| Inspector       | All current pay pts          | 8         | £58,452   | £63,854                                 |
| Chief Inspector | All current pay pts          | 8         | £58,452   | £63,854                                 |

4.5.12 The above table is indicative of the difference between current pay points and competitive pay points. We do not argue that all Inspectors and Chief Inspectors should be on the same pay point, for example. But the competitive salaries are so far from the current reality that there is plenty of scope for all pay points to be increased in order to bring officers into line with where they should be. For example, a Constable on pay point 4 earns £28,158. A competitive salary at that level is £34,764, £6,606 higher. A Sergeant at the bottom of the scale earns £43,965, and one at the top £46,227. A competitive salary would be £51,745 (a gap of between £7,780, and £5,518). For the lowest paid Inspectors, on £52,698, the gap to their competitive salary of £63,854 is £11,156.

4.5.13 We understand that in this year the PRRB have been directed by government to deliver a 0% uplift for officers, and that this means the PRRB will likely be unable to do anything to address the unfairness in police pay compared to others this year. However, we believe it is essential that in future years this is attended to, and we

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<sup>22</sup> The competitive salary is calculated as:

IDR comparator salaries (@40 hrs) plus P factor (@13% for Constables, and 13% of the new competitive salary for the top of the Constable scale for all others i.e. £5,402)

submit this evidence on benchmarking in order to set the scene for future years' deliberations and recommendations.

4.5.14 The NRT proposed using benchmarking as a way to calibrate officer pay some years back, and this has been a key feature of submissions to the PRRB for at least the last 3 years. Whilst there have been some differences of opinion in terms of the fine detail of how this will be enacted, from the outset the staff associations have supported the idea of benchmarking, and its potential uses. Last year we proposed an iterative approach working with the NRT (Para 3.2.7) and we are pleased that in the last few months there has been increasing dialogue with the NRT on this matter.

4.5.15 Moving forwards, it is important that this work moves from being what has to date been a largely academic exercise, to practical implementation. Last year in our submission (recommendation 3)<sup>23</sup> we sought for this to be driven faster: we repeat that here. Work suggests that officers are not paid competitively, and therefore it will be essential to set out a route map as to how this can be addressed. We believe this may ultimately require additional funding, albeit this may be a case of moving funding from elsewhere in the policing budget. We have previously had suggestions from the NRT that certain pay points might be removed in order to expediate the alignment of officer pay with external comparators. In fact, the removal of the bottom pay point of Sergeants' pay last year had that very effect. We believe there is more work to be done on this, and we seek for the PRRB to endorse this in principle, and for the NRT and staff associations to prioritise this work in year, with a view to having a firm proposal in next year's submissions. As an example, in our submission last year we sought for the pay points -1 and 0 on the Constable pay scale to be removed (recommendation 9). The data provided this year leads to that same conclusion, and we believe that further delay in so doing may result in a failure to recruit the numbers required for the Uplift of 20,000.

4.5.16 We believe the PRRB should Insist that a timetable be set out to ensure that the work on the practical implementation of the benchmarking is addressed: this should include prioritisation of the work started last year, to explore whether the alignment of officer pay with comparators can be expediated by removing further pay points. We

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<sup>23</sup> Submission to the PRRB on behalf of the PFEW and PSA; prepared by Research and Policy; 7<sup>th</sup> February 2020.

would welcome the PRRB seeking for an agreed position on this to be provided in next year's submission.

4.5.17 Our recommendations regarding benchmarking echo those of the NRT, but with further emphasis on ensuring that officer pay is uplifted to where the data leads.

*Recommendation 4 Support the use of benchmarking as set out in this submission, and that of the NRT*

*Recommendation 5 Support the definition and valuation of the P factor, and its use in benchmarking (as agreed by the NRT and staff associations)*

*Recommendation 6 Agree that the maximum value of the P factor should be 13% of the top of the Constable salary*

*Recommendation 7 Agree that the PRRB will review the notional value of the P Factor, along with the associated descriptors, at least every 5-years*

*Recommendation 8 The PRRB should insist that a timetable be set out to ensure that the pay scales are amended to take officer pay to the points where the evidence leads: i.e. competitive pay as calculated using benchmarking*

## 4.6 Targeted Variable Payments

- 4.6.1 The staff associations' position on TVPs has been that we agree that it is important to reward officers in hard to fill and especially challenging roles. But we would prefer this to be done in a systematic manner, with the scope for discretion reduced.
- 4.6.2 In our first PRRB submission, and since, we have stated that:  
*"The PFEW believes that the pay system should demonstrate organisational justice. Officers...should be rewarded appropriately for their skills, knowledge, attributes, hours worked, sacrifices made, and the risks and demands of the job. We agree with Winsor's position that these should be properly evaluated through a systematic job analysis".<sup>24</sup>*
- 4.6.3 Experiences of the past have demonstrated that when efforts have been made in policing to provide extra pay for challenging roles, unjustifiable inequalities have been introduced. Examples include both Competence Related Threshold Payments and Special Priority Payments, both of which had to be removed due to the unfairnesses caused. It is against this background that the staff associations have fought to ensure that past mistakes are not repeated, and sought for the employer to undertake the statutory processes under the Public Sector Equality Duty. Last year we provided information from the NPCC's own survey of HR departments demonstrating that this concern was shared by them, as well as data from forces demonstrating that while some forces were paying those undertaking roles TVPs, others were not. Our concern was that this may ultimately lead to bidding wars.
- 4.6.4 While welcoming the additional pay for officers, the staff associations have therefore been unable to give unequivocal support to TVPs because of our concerns regarding equality. Last year we pointed out that "we have a duty to members to ensure that equality laws are complied with, and that they are fairly treated". Our recommendation 6 was "The NPCC must, as a matter of urgency, provide an acceptable Equality Impact Assessment (EIA) on this. We have sought to have visibility of the NPCC legal advice".<sup>25</sup>

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<sup>24</sup> Submission to the PRRB by the PFEW and PSAEW; prepared by Research and Policy; (Page 9); 9<sup>th</sup> January 2015.

<sup>25</sup> Submission to the PRRB on behalf of the PFEW and PSA; prepared by Research and Policy; 7<sup>th</sup> February 2020.

- 4.6.5 During this past year the NRT have been working with us on other matters (e.g. related to COVID, as stated above). However, we have recently been provided with a draft determination and guidance regarding a revised version of TVPs. This includes three new categories for TVPs: a service critical skills payment, a service critical skills retention payment and a recognition of workload payment
- 4.6.6 We believe that the revised version is an improvement. In particular we welcome the increase in the maximum payment to £5,000, (which the PRRB supported last year) and we are pleased that some progress is starting to be made regarding trying to ensure more consistent application of TVPs. Our remaining concerns about these payments relate to equality.
- 4.6.7 In our yearly Pay and Morale survey we asked questions about TVPs<sup>26</sup> that were designed to try to flush out any possible adverse impacts. Some of the data seem to give reassurance, but a deeper dive into the patterns of responses gives cause for concern.
- 4.6.8 The functions where TVPs were most likely to have been paid were investigations (6.5% of respondents had received one); training (3.8%); and operational support (3.7%). Respondents in investigations who received a TVP were most commonly working in rape and serious sexual offence units. Operational policing recipients were almost exclusively firearms officers. When we examined differences by gender, we found that the higher representation of females in the investigation roles receiving this payment (sexual offence investigators) meant that when the TVPs were looked at across the board, females were actually slightly more likely than males to receive a payment. However this simple statistic may mask unfairness, as there is a need to adjust the data for the baseline number of males and females in each role. Tellingly, female respondents who did not receive a TVP were significantly more likely than male respondents to say they know of others working in the same role as them who did receive this payment. (3.1% of females compared to 2.5% of males). Computed as an adverse impact ration this is 0.81, close to the 4/5<sup>th</sup> rule. Furthermore, the TVP payments made to female officers was significantly lower than that made to males, at an average of £896 compared to an average of £1,093.
- 4.6.9 As for the differences in access for BAME officers, 2.6% of BAME officers received TVPs compared to 2.8% of white. While the difference is relatively small, as for

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<sup>26</sup> Pay and Morale Survey 2020 – Pay Reform Data Report; Boag-Munroe, F.; R078/2020

females we found that the number of BAME officers who did not receive a TVP but knew of others doing their role who did was higher than the number of white officers who said the same: 3.7% compared to 2.6%.

- 4.6.10 In addition to our concerns regarding equality, last year we noted our suspicion that differences between forces may emerge due to affordability. Worryingly, while the focus on changes to the design of TVP in year has been on the amount of the TVP, and the latest document seeks approval to increase the maximum to £5,000, we are finding that only 2.8% of Federated ranks report receiving a TVP anyway, and those who do receive an average of only £1,043. 37% of those receiving a TVP were dissatisfied with the amount. Affordability appears to be the issue here: that is, forces are allowed to pay a much higher amount, but cannot do so because of budget constraints.
- 4.6.11 We are very pleased that, as of a meeting of the Police Consultative Forum on 20<sup>th</sup> January 2021, the Home Office have agreed to undertake to draft an Equality Impact Assessment. We were also reassured by them that, in keeping with the Public Sector Equality Duty, this will be forward looking. The Home Office also described plans to gather and assess data throughout a period when the TVPs will be in place.
- 4.6.12 As of 21<sup>st</sup> January the Home Office have further indicated that the intention is to ultimately use “a form of job or role evaluation to ensure consistency in approach both within and across forces”<sup>27</sup>.
- 4.6.13 We see both the recognition of the need for an EIA and the need to use some form of job or role evaluation as significant successes for the staff associations, highlighting the vital role we play in holding the employer to account.
- 4.6.14 We are keen to engage in this process, both to help inform the EIA, and to understand and support the collection of appropriate monitoring data. It is vital that in determining what data are collected due consideration is given to all the ways in which unfairness may appear. Indeed this is one of the reasons why it is important to conduct the EIA in advance, so that any possible unfairness can be anticipated and monitored.

*Recommendation 9 We welcome the Home Office’s agreement to conduct a national EIA and to ensure that going forward TVPs contain an element of role / job evaluation.*

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<sup>27</sup> Email from Home Office to PCF members, 21<sup>st</sup> January 2021.

*We believe the PRRB has a role to play in monitoring the realisation of these promises*

*Recommendation 10 The new determination on TVPs should be consulted on, and TVP payment maximum should be increased to £5,000.*