



APCC Submission



Submission to the Police Remuneration Review Body from the Association of Police and Crime Commissioners

Monday 11 February 2019

Introduction and Background

1. The Association of Police and Crime Commissioners (APCC) is the national body which supports Police and Crime Commissioners (PCCs), and other local policing bodies across England and Wales, to provide national leadership and influence change in the policing and criminal justice landscape.
2. The APCC welcomes the opportunity to submit evidence to the Police Remuneration Review Body (PRRB) on behalf of our members.
3. PCCs were elected for the second time on 5 May 2016, in 40 force areas across England and Wales. Every force area is represented by a PCC, except Greater Manchester and London, where PCC responsibilities lie with the elected Mayor.

Police and Crime Commissioners – the role

4. 40 PCCs were elected across England and Wales on 5 May 2016. Since May 2017 the role of the PCC in Greater Manchester has been merged with the new elected Mayor for Greater Manchester. There is ongoing consultation regarding combining the role of the PCC and the Mayor of the West Midlands Combined Authority, with the current arrangements to remain in place until at least May 2020.
 - As of 2018/19, PCCs are responsible for a combined police force area budget of approximately £11.3 billion [comprises core grant funding, NICC grants, Council Tax grants and precept (including Welsh Government and DCLG funding)].
 - The role of the PCCs is to be the voice of the people and hold the police to account. They are responsible for the totality of policing.
 - PCCs aim to reduce crime and deliver an effective and efficient police service within their force area.
 - PCCs have been elected by the public to hold Chief Constables and the force to account; effectively making the police answerable to the communities they serve.
 - PCCs ensure community needs are met as effectively as possible, and are improving local relationships through building confidence and restoring trust.

- They work in partnership across a range of agencies at local and national level to ensure there is a unified approach to preventing and reducing crime.

Police and Crime Commissioners - Statutory Responsibilities

5. Under the terms of the Police Reform and Social Responsibility Act 2011, PCCs must:
 - Secure an efficient and effective police force for their area;
 - Appoint the Chief Constable, hold them to account for running the force, and if necessary dismiss them;
 - Set the police and crime objectives for their area through a police and crime plan;
 - Set the force budget and determine the precept;
 - Contribute to the national and international policing capabilities set out by the Home Secretary; and
 - Bring together community safety and criminal justice partners, to make sure local priorities are joined up.
6. The 2017 Policing and Crime Act included provisions to enhance the role of PCCs, specifically in relation to:
 - Enabling PCCs in England to take on the duties and functions of fire and rescue authorities (FRAs); and
 - Strengthening PCCs' oversight role of the local police complaints system in England and Wales.

Remit

7. The remit for 2018/9 consisted of five matters:
 - How to apply the pay award for 2019/20 for police officers of all ranks, including chief officers, in the context of how it will support overarching NPCC proposals and timetable for a new pay structure.
 - To review the NPCC's design principles, framework and assumptions for pay reform; and to provide views on the extent to which the views of the staff associations have been considered in the development of the design.
 - To review the NPCC's detailed project plan and risk register and provide observations on the timescales for implementation, taking into account the requirement for formal consultation with the staff associations and the need to make legislative changes.
 - To review the NPCC's proposals for progression pay for police apprentices.

- To review proposals from the NPCC in relation to making payments to the superintendent ranks for undertaking each 24 hour on-call period.

APCC consultation

8. The APCC response to the PRRB request for evidence was led by Ron Hogg, Police, Crime and Victims' Commissioner for Durham and APCC Workforce Lead. Ron has been a member of the APCC Workforce standing group since its formation and has been APCC Workforce Lead since May 2016.
9. All PCCs were consulted on the remit and the conclusions reached by PCCs are presented below.

Police funding 2019/20

10. Precept flexibility of up to £24 is available for all PCCs (or equivalents) in 2019/20 and some PCCs welcome the additional flexibility. It offers a much-needed opportunity to increase investment in local policing, which is something the public have been asking for and supporting at a local level. However, some PCCs have also expressed concerns at the impact of the additional precept, which varies considerably across England and Wales. The additional precept means annual increases in council tax ranging from 9% in North Wales to 22% in Northumbria. In terms of budgets, the additional income from the precept is worth approximately 4% of net budgets nationally but that figure ranges widely from one PCC to another. For example, from 2.6% (MOPAC) to up to 6.3% (Surrey). Some PCCs are very concerned that the burden of the additional funding should fall significantly on local taxpayers, rather than being met through central government funding. It should be noted that PCCs in Wales are not limited by precept restrictions in the same way that English PCCs are. Wales PCCs are continuing to work with the Wales Government as well as consulting locally in the setting of local precept levels.

Application of the pay award for police officers of all ranks in 2019/20

11. In consulting PCCs on this year's PRRB submission PCCs were asked to consider the merits of both a three year deal and a single deal.

Three year deal

12. The APCC was asked by the NPCC at a fairly late stage in the proceedings to consider the prospect of a three year pay award for police officers. We entirely understand the reasons why a three year deal was considered at such a late stage given the uncertainty around the police settlement that had existed. To some extent that uncertainty continues with a number of PCCs still in the process of consulting and awaiting approval on proposals to increase the policing precept.
13. The prospect of a three year award was not without attraction. Such an award would provide the service with certainty over pay and free up capacity to work on and consider the extensive pay and reward proposals will be brought forward.

14. PCCs also considered that the front loaded aspect of the NPCC proposals provided an opportunity for the service to provide police officers with a significant award, at least in 2019/20, as reward for their service and contribution in recent years when their pay awards have disappointed them.
15. However, the lack of financial certainty going forward is seen as a major inhibiting factor for PCCs in considering a front loaded three year pay deal. With a Spending Review anticipated for 2020/21 there is no funding certainty beyond the current 12 month settlement. Without that certainty PCCs are unwilling to commit to an award on the basis proposed by the NPCC.
16. Although unavoidable the late emergence of the potential three year award has further contributed to PCCs unwillingness to support the proposal.
17. The current settlement gives PCCs the flexibility to raise the Policing Precept element of council tax on Band D properties by £24. The majority of PCCs have either received agreement to such increases from their local electorates and the Policing and Crime Panel, or are in the process of doing so. At the time of submission we do not have exact figures on the number of PCCs pursuing the maximum precept flexibility.
18. In making a case to Policing and Crime Panels PCCs will outline specific plans for spending the money raised, often including the recruitment of extra officers, often with specific numbers of officers attached. For example, the Nottinghamshire PCC has announced an additional 40 officers as a result of the agreed precept increase that makes full use of the flexibility.
19. PCCs expressed concern in their responses to our consultation that a higher than budgeted pay award would be likely to affect their ability to deliver on proposals to increase officer numbers promised to local electorates as a result of precept increases.
20. Therefore, the APCC is unable to support proposals for a three year deal at this time. This is based on the unavoidably late development of the proposal; potential derailment of existing plans to increase officer numbers from extra funding raised by precept increases; and uncertainty over future financial settlements.
21. However PCCs do see merit in pursuing funding for a multi-year deal as part of the service's bid to the forthcoming Spending Review.
22. Many PCC responses are of the view that a Spending Review settlement that built in funding for a three year deal would be very welcome.

One year deal

23. As outlined above (12-22), there was little support among PCCs for a three year deal with much stronger support for a one year deal. The reasons for favouring a one year deal are also outlined above (20).
24. The majority of PCCs support a one year pay award based on the most recently published CPI figure of 2.1%.

Chief officers

25. PRRB noted in their 2018 report that, “in the chief police officer ranks there does appear to be an issue in ensuring a sufficient number of quality applicants for vacancies.”
26. In September 2018 the APCC, NPCC, CPOSA and the Police Superintendents’ Association met for a roundtable discussion convened by the College of Policing. The purpose of the discussion was to consider the appointment, progression and retention of chief officers. This was in recognition of the issue described by PRRB in 2018 and mounting evidence of issues with both the talent pipeline and the retention of chief officers.
27. The Roundtable found agreement on four issues affecting appointment, retention and progression, including the personal impact on individuals considering Chief Officer roles, including financial, family and relocation factors, and there are five workstreams being taken forward to try and address those issues.
28. The Roundtable discussion concluded that the issues affecting attraction, progression and retention are manifold and there is no silver bullet to resolve the issues.
29. Although pay is not the sole reason for any of the issues it is acknowledged that the current chief officer pay structure has been in place since 2003. The length of time the current structure has been in place and the uncertainty over the formula used to determine it are further drivers for a review of chief officer pay along side the current issues affecting appointment, progression and retention.
30. Pay and reward reform of the service provides a vehicle and rationale for a review of chief officer and chief constable pay. PCCs agree that the overall design principles, including benchmarking pay and reward against appropriate comparators, is as relevant for chief officers as it is for other police officer ranks.
31. On the basis of the issues identified the APCC will look to bring forward proposals relating to a review of chief constable pay in 2020/21, working in conjunction with the NPCC to ensure consistency with all other ranks. This work will be conducted in consultation with CPOSA.
32. In respect of 2019/20, the APCC support an award of 2.1% for the chief officer ranks.

To review the NPCC’s design principles, framework and assumptions for pay reform; and to provide views on the extent to which the views of the staff associations have been considered in the development of the design.

33. We are satisfied that the design principles and assumptions will underpin a pay and reward framework for the police workforce envisaged by the joint APCC and NPCC Policing Vision 2025, a pay and reward framework that rewards competence and contribution rather than time served.
34. In respect of the design assumptions we welcome the NPCC’s commitment to ensuring that officer base pay will not reduce when transitioning from existing pay arrangements to the new framework. The assumption that the transition to the new framework will be cost neutral is welcome but may prove difficult to achieve. Transition from one pay and reward

framework to another, particularly where there may be pay protection arrangements, often involves an up-front cost.

35. We are satisfied that the staff associations have been adequately consulted on these aspects of pay reform under the auspices of the Police Consultative Forum. It is important that the staff associations are fully consulted and engaged throughout the process of implementing pay and reward reform and the APCC is fully committed to participating in and encouraging that process through our membership of the Police Consultative Forum.

To review the NPCC's detailed project plan and risk register and provide observations on the timescales for implementation, taking into account the requirement for formal consultation with the staff associations and the need to make legislative changes.

36. We understand that the NPCC is not bringing this documentation forward in their 2019/20 submission, but it will continue to be considered in the Police Consultative Forum of which the APCC is a member.

NPCC proposals for progression pay for police apprentices

37. The starting salary range for the Police Constable Degree Apprenticeship (PCDA) is a range between £18,000 and pay point one for constables (currently £23,586), the salary to be determined by the local Chief Constable taking account of: the views of the local policing body; local recruitment needs; and policing qualification or relevant experience of apprentice.
38. We understand that the NPCC propose that following introduction of new pay scales a PCDA should be paid at the rate of a Foundation Constable on successful completion of the apprenticeship. It is currently anticipated that the pay for a Foundation Constable will be pitched at approximately £25,000.
39. There is a wide starting salary range for the PCDA. Given that starting salary is a matter for local determination (within a prescribed range) we understand that the NPCC propose that pay progression for PCDA's in their first three years is also a matter for local determination.
40. PCCs are supportive of these proposals given the potential for widely disparate starting salaries.

To review proposals from the NPCC in relation to making payments to the superintendent ranks for undertaking each 24 hour on-call period

41. We are aware that the NPCC considered a proposal to introduce an on-call payment for the superintending ranks.
42. We are also aware, through our membership of the Police Consultative Forum, that the extent of on-call performed by superintendents is an issue that has been raised in that forum by the Superintendents Association.

43. It is a matter of some concern that the relevant staff association is reporting that the amount of on-call required of their members is having a significant impact on their work-life balance and wellbeing.
44. We know that CC Francis Habgood has expressed the view that payment for on-call will not necessarily reduce the extent of on-call required of superintendents and that better understanding and management of on-call is required to reduce the burden on superintendents.
45. However, we know that the Superintendents Association believe that payment for on-call will at the very least be seen as some recognition by employers of what is being asked of their members.
46. In principle we are not supportive of allowances at this rank, however the Superintendents Association have made a persuasive case for some kind of payment to at least recognise the increased expectation of their members.
47. PCCs were consulted on the payment of the on-call allowance to the superintending ranks for a time limited period until the extra duties could be recognised by reform of the pay for the superintending ranks. This was a proposal supported by APCC Workforce Lead, Ron Hogg.
48. However, there were mixed views on the proposal. Although there was some support for the proposal it was not universal.
49. Therefore, we report that although there is some support among PCCs for the introduction of a time-limited on-call payment to the superintending ranks it is not universal.

Conclusion

50. PCCs once again welcome the opportunity to submit evidence to the PRRB.
51. PCCs continue to recognize and value the extraordinary contribution made by police officers to the safety of their communities. PCCs also remain committed to proposing pay awards that are fair for police officers and affordable within force budgets
52. In summary, in respect of the remit:
 - PCCs support a consolidated 2.1% pay award for 2019/20 for police officers on all ranks and all pay points, with a commensurate 2.1% uplift to the London Weighting and Dog handlers' Allowances.
 - PCCs support NPCC proposals for the pay progression of Police Constable Degree Apprentices to be a matter for local determination in their first three years of service.
 - There is some support among PCCs for the introduction of a time-limited on-call allowance for the superintending ranks, but that support is not universal.