



APCC Submission



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

Thursday 16 February 2023

Introduction and Background

1. The Association of Police and Crime Commissioners (APCC) is the national body which supports Police and Crime Commissioners (PCCs), Police Fire and Crime Commissioners (PFCCs) 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.

Police and Crime Commissioners – the role

3. Ensuring the safety, security and wellbeing of citizens is the first duty of any government at home and abroad. Since Parliament voted to introduce the new elected position of Police and Crime Commissioners (PCCs), Commissioners across England and Wales have demonstrated that the role provides a strong and accountable voice for communities and victims bringing democratic accountability to the delivery of a safer society alongside reduced crime.
4. Elected Police and Crime Commissioners were introduced in 2012 to increase public accountability in policing and create innovative and devolved responses to crime and disorder. After three elections, Commissioners' leadership and track record of delivery have established PCCs as the people's voice in policing: speaking up for victims and convening partnerships that improve community safety. Turnouts have risen at every election and there is now strong cross-party political support for the role of the PCC and its potential.
5. Commissioners have learnt from each other by sharing best practice and collectively driven the ambition to protect the public.
6. Police and Crime Commissioners have clear electoral mandates with direct accountability to the public that is unique within the law and order system. As corporation sole with electorates the size of multiple Parliamentary seats, direct votes cast for Commissioners across force areas range in size up to a maximum of several hundreds of thousands of voters.
7. Today, Commissioners represent victims and "have their backs" in often adversarial, closed or hard to access processes for the public. They provide local and often innovative services to victims on behalf of the Ministry of Justice.

8. Commissioners are uniquely placed to listen and act on behalf of voters and victims, bringing the power and legitimacy of the voters into important public service conversations, especially in the commissioning of services.
9. As elected representatives, Commissioners are a voice for their local community around policing and community safety, engaging the public in decision making to ensure greater transparency and accountability.
10. The responsibilities include:
 - Producing a Police and Crime Plan which sets out local priorities
 - Appointing the Chief Constable and holding them to account
 - Engaging with the public, giving them a voice in local policing and community safety
 - Setting the police budget, and deciding how much local people pay towards local policing through the precept (Policing budgets are significant in size, ranging from £700 million for some of the larger forces to £350 million for mid-size forces, and £140m for smaller forces. The PCC is ultimately responsible for these budgets)
 - Commissioning services to support victims of crime
 - Working with other organisations, including criminal justice partners, to deliver a joined-up approach to local priorities
 - Improving community safety
 - Chairing Local Criminal Justice Boards.
11. Four Police, Fire and Crime Commissioners (PFCCs) also serve a similar oversight and governance process for their local Fire and Rescue Services.
12. In three areas, Greater London, Greater Manchester and West Yorkshire, directly elected mayors hold the powers of the Police and Crime Commissioner. These powers are delegated to a dedicated deputy mayor for policing in those areas.

Remit

13. The Home Secretary referred three matters to the PRRB:
 - How to apply the pay award for 2023/24 for police officers of all ranks, including chief officers
 - To consider proposals resulting from the review of chief officer remuneration
 - To provide further commentary and observations on benchmarking and the P-factor, and whether the points raised in the last pay round have been addressed.
14. This submission provides comment on the application of the pay award for 23/34 for police officers of all ranks, and provides supplementary comment to the separately submitted report of the Chief Officer Remuneration Review

APCC submission

15. This submission to the PRRB has been led by the APCC Workforce portfolio group, chaired by PCC Peter McCall.

How to apply the pay award for 2023/24 for police officers of all ranks, including chief officers.**NPCC joint statement**

16. The APCC is supportive of the opening joint statement to the 2023/24 NPCC PRRB submission on police officer pay. PCCs are particularly mindful of the potentially greater attrition of police officers in the coming years and the impact this may have on the service.
17. The concerns expressed in the NPCC submission about the risks posed to the police service of an unfunded pay award of cuts to police staff, delays to recruitment and reduced levels of asset investment are well founded. We agree with the conclusion that *“the cumulative impact of this will be a reduction in the totality of policing and less support for officers which undermines attraction and retention and makes their job more difficult.”*
18. We also agree that attracting the brightest and best talent into policing, and retaining it, is essential to the success of the strategic outcomes of both the National Beating Crime Plan and local Police and Crime Plans. We welcome the work undertaken by the NPCC to develop a more formal pay and reward strategy in support of the attraction, recruitment and retention of the policing workforce.

Flat rate v. percentage pay award

19. Although there is some merit in the consideration of flat rate pay awards as a means of directing a higher proportion of pay awards at the lower paid, we note that the 22/23 flat rate pay award was poorly received by the police officer staff associations. It must be considered likely that a further flat rate award in 23/24 would be similarly poorly received.
20. The flat rate award in 22/23, although greater than some police officers were expecting, was made in the context of widespread dissatisfaction from police officers with recent pay awards through austerity and the public sector pay pause, compounded by the beginnings of widespread industrial action and unrest in the public sector over pay. It is clear that staff associations and their members feel disadvantaged in being unable to take industrial action in pursuit of improved pay awards at a time when many public sector trade unions are involved in such campaigns.
21. Although there were a very clear set of circumstances that led the PRRB to recommend a flat rate pay award in 22/23, we believe that a percentage pay award would be best received by the majority of police officers in 23/24.

Affordability and the 23/24 pay award

22. As with the NPCC, the APCC will not be recommending a particular quantum for this year’s pay award in this submission.

23. As ever PCCs are mindful of issues around affordability for the potential pay award for 23/24. Mindful of the 2% pay increase funded in the most recent spending review this is the amount that most PCCs have allowed for in respect of the 23/24 pay award. Any pay award over 2% that is unfunded will have a significant impact on budgets and service delivery in many forces.
24. Balanced against those concerns over affordability are the needs and aspirations of the workforce at a time when inflationary pressures are putting individual and household budgets under significant pressure.

To consider proposals resulting from the review of chief officer remuneration

25. The APCC commends to the PRRB the conclusions and proposals of the Chief Officer Remuneration Review. The commentary contained within this submission is intended to complement the separate report.
26. The recommendations contained within the report are the conclusion of a measured and considered process that has benefitted from the input of PCCs, chief officers and independent oversight and expertise.
27. The last review of chief officer pay and conditions took place in 2003. This most recent review may well be considered overdue given that the following issues had been identified and evidenced by a number of different stakeholders over recent years:
- Restricted talent flow into the chief officer ranks,
 - Paucity of candidates for vacancies,
 - Limited mobility between forces,
 - Limited progression within chief officer ranks,
 - Difficulties with chief officer retention.
28. Although we are clear that the conclusions of the review should not be considered a panacea for all of the above (pension issues, for example will continue to affect retention in particular) the recommendations of the review are specifically designed to provide incentives for promotion, and to remove barriers and obstacles to progression.
29. The simplification of the pay structure for Chief Constables and Deputy Chief Constables is the single biggest step we can take to achieve these goals. Reducing a 12 point pay scale for 41 jobs down to three different groups significantly reduces overlap between the pay of DCCS and CCs and introduces significant pay differentials.
30. The value of the pay differentials are the financial incentive they provide to progress from ACC to DCC, and from DCC to CC. They also provide financial incentive to progress from DCC to DCC, or from CC to CC, roles in larger forces.
31. The recommendation brought forward to amend the relocation allowance complements these proposals and can only encourage mobility among prospective chiefs and existing chief officers, in providing an allowance that better recognises and reflects the needs of the police service and its chief officers in 2023.

32. We also seek support from the PRRB in greater flexibility over the ability of a PCC to set the salary of a chief constable at a rate of up to 10 per cent above the published rate. At present a PCC may only exercise this discretion on appointment of a chief constable. However, we believe it would be consistent with the objectives of this review, particularly in respect to retention, if that discretion could be applied at any point within a chief constable's term, rather than just on appointment.
33. We are grateful to the Home Secretary for seeking the views of the PRRB on the proposals from the chief officer remuneration review. And while we recognise the difficulties in considering chief officer pay and conditions against the inflationary context experienced by officers of all rank we would emphasise the evidence brought forward, both in respect of clearly identifiable problems and practicable and effective solutions. Leadership is always important, it has never been more important to the police service of England and Wales, and we seek to remove barriers and obstacles to progression from our pay structures.

Conclusion

34. The APCC welcomes the opportunity to submit evidence to the PRRB and the independence they bring to this process.
35. In summary, in respect of the PRRB remit the APCC submits the following recommendations in respect of the Chief Officer Remuneration Review:
- **A new national pay structure for CCs, with a consequential impact on DCCs.**
 - **PCC discretion to supplement CC national base pay at any point in a contract term.**
 - **The amendment of the Relocation Allowance to support chief officer mobility.**