CPOSA

Chief Police Officers' Staff Association

Submission to the Senior Salaries Review Body 2025

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Opening Statement

This opening statement represents the combined voice of the National Police Chiefs' Council (NPCC), the Chief Police Officers' Staff Association (CPOSA) and the Police Superintendents' Association (PSA). It comes following extensive consultation on the part of each organisation, with members representing senior leaders across UK policing, and years of submitting in-depth evidence to support fair and appropriate levels of remuneration for police officers.

We recognise that once again, decisions around public spending are extremely difficult and that the financial challenges facing government are significant. That said, it is our ongoing belief that decisions around the remuneration packages proposed for policing should be based on what is appropriate for the service, reflective of the demands police officers face, the responsibility they hold, and their unique position as crown servants.

The service continues to operate in a context of year-on-year real-term pay cuts for officers, alongside requirements for efficiency savings from forces. As a result, forces have substantial concerns over their financial sustainability, with some facing significant deficits impacting their ability to deliver on local demand, to retain the workforce strength required and to deliver ongoing savings. We currently operate in an unfunded budget gap estimated at £500m in 2025 /26.

After the rapid growth in officer numbers between 2019 and 2023, the service is slowly maturing, building its experience and skills. However, instability and uncertainty remain, with a third of officers still under 5 years in service, and 1 in 5 new officers leaving policing within the first three years. In addition, we are yet to receive the detail needed to understand how officer numbers will be impacted as a result of the recently announced Neighbourhood Guarantee, and the commitment to recruit an additional 13,000 special constables, PCSOs and neighbourhood officers.

The government's 'Safer Streets' mission contains ambitious targets including the halving of

instances of violence against women and girls and knife crime within a decade, alongside restoring public trust and confidence in the criminal justice system. These are ambitions we support, however, a critical component to achieving these, is an appropriately resourced service, with a skilled and diverse workforce that that feels valued and supported, at both a local and national level.

The reward package provided to our workforce plays a central role in this, impacting feelings of value, workforce morale and wellbeing and personal financial stability. We know from evidence shared within submissions from each organisation, that police officers do not believe their reward package is fair, and that as a result, alongside the demand they are facing, morale is low. Fair, transparent reward packages are essential in retaining skill and talent, particularly that of officers longer in service, and in attracting new people to join. We each share evidence that seeks to provide the context and data explaining this, and to enable informed recommendations to improve on the current package.

Our individual submissions outline the immediate pressures that we recommend must be addressed through this year's pay review process. They also outline the service's ambitions for changes to the pay structure to ensure it is fair, transparent, and compensates officers for the realities of work they face. These recommendations are an opportunity to address the inherent issues within the structure, as part of a costed plan through Comprehensive Spending Review.

The legal requirement on the service to set a budget, taking account of inflationary pressures, means forces have largely factored in 2%-2.8% for the annual pay award from September 2025. This is **not affordable** for forces without implications for service delivery. There is continued, growing demand on forces, an estimated shortfall of 12,000 officers and significant financial instability. Forces cannot absorb any additional cost without an impact on the public and risks for the delivery against the Safer Streets Mission.

Each organisation's recommendations include a pay uplift (NPCC recommendation of 3.8%, and PSA and CPOSA of 4.8%), and uplifts in a number of allowances, many of which have not been reviewed for a considerable time. In previous years, we have set out the negative

impact of the existing allocation mechanism and funding formula for the pay element of any settlement. Again, we ask the pay review body to comment on this, noting its' impact on affordability.

The service needs a stronger forward-looking focus in relation to its workforce. Outside of constables at the top of their pay scales, for most officers, base pay and total cash is not comparable with the median of other public sector and not-for-profit organisations when taking 'the P factor' – the very distinct factors linked to policing, into consideration, especially with limited opportunities for wider cash remuneration outside of the constable and sergeant rank. We must also recognise that police officers have no ability to withhold labour or negotiate their pay package and are rightly subject to the highest levels of scrutiny and accountability. If we want to drive standards and recruit a skilled, diverse workforce, including those with additional skills who are changing careers, our offering simply must improve.

In making recommendations to the home secretary on this year's pay award, we ask the pay review body takes serious consideration of the P factor. Perhaps more than in any other year, this distinct requirement delivered by the police service has been evidenced in the critical dependency on UK policing in response to the widespread disorder across the country.

Each of our organisations will be contributing towards the government's White Paper on Policing, which we all hope will set the foundations for much needed positive change. Real-terms investment will be critical to realise system reform to drive productivity, leveraging technology but also investing in the workforce and workforce mix. The development of the White Paper must be viewed against this context. We must retain and attract a skilled and diverse workforce to deliver on our strategic aims. The NPCC recommends an annual pay uplift of 3.8% from September 2025 with funding provided centrally over 2%, whilst the PSA and CPOSA recommend a pay uplift of 4.8%.

We hope the submissions provides a clear, detailed rationale and look forward to providing further context in our respective oral evidence meetings in March.

Introduction and Summary

On behalf of its members, CPOSA seeks to ensure fair remuneration that is determined through a well-informed, transparent and objective process. As such, we present to you our written submission and look forward to building upon this at the oral evidence session.

The last pay round saw police officer pay get the lowest of all increases recommended by pay review bodies at 4.75%, against an average of 5.5%. Whilst that pay award has started to close the chasm between pay awards and the increases in CPI seen over the past decade, it has done so only marginally.

Following the evidence presented in last year's submission, it is unsurprising to see the conclusions within this year's report that once again illustrate projected high attrition in an already inexperienced workforce with 42% of respondents stating their intention to leave within three years and 65% within five. Only around half of all chief constables have over three-year's service, with both deputy chief constables and assistant chief constables having considerably less time in their rank. We have some incredibly talented leaders within the police service but time and time again we see that talent leave at their earliest retirement date for roles within both public and private sector organisations. They cite reasons including pay, pensions, issues with governance and the intense scrutiny policing is under. Everything must be done to retain talent and experience. It cannot be right that a workforce that is inexperienced in itself is losing such talented leaders.

Analysis by the Institute for Fiscal Studies shows that higher-paid public sector workers have seen larger falls in their real-term pay than less well-paid public sector workers. It further states this grouping have fallen further down the overall pay distribution, with nurses and civil servants in the higher earning bracket seeing their pay hold up better, compared with the rest of the workforce, than those in the higher earning bracket who are doctors, teachers or police officers¹.

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¹ IFS Report R334 Pressures on Public Sector Pay September 2024

The annual CPOSA members survey found continuing dissatisfaction with base pay, pension provision and their overall remuneration package. The survey found only 42% of respondents were either satisfied or very satisfied with base pay whilst the same level of satisfaction with pensions benefits plummeted to an all-time low of 16%. Whilst some of this will be linked to poor implementation of the McCloud Remedy, we can also conclude that some members will now know their actual pension value on retirement following this reassessment and many will have found they will be less well off in retirement than they had once hoped.

With the evidence CPOSA has gathered, we believe our members should receive an uplift in pay of 4.8% which takes account of inflationary pressures and takes another small step towards narrowing the gap between historic pay settlements and CPI. We also believe a more structured multi-year increase that addresses this gap and supplements any inflationary increase would enable members to better visualise how the vast reduction in real term pay can be addressed.

This is set against the findings of the independent resilience survey undertaken by Affinity Health that contained some incredibly worrying information. They conclude:

'The CPOSA 2024 levels of anxiety and depression are even higher now than they were during Covid-19, particularly the symptoms of anxiety among respondents. The improvement seen in the general population and improvement in wellbeing of NHS healthcare professionals is not being seen in CPOSA members.'

Amongst other things, the survey found:

 47% of respondents were classed as showing 'normal' levels of symptoms for anxiety (down from 73% in 2021 and 61% in 2018). Mild (29%), moderate (15%) and severe (8%) levels of anxiety are all higher than in both 2021 and 2018, using the HADS measure.

- Levels of depression are also higher than in previous years. 74% are classed as showing 'normal' levels of depression (down from 82% in 2021 and 79% in 2018).
 Mild (20%), moderate (5%) and severe (1%) are all higher than they have previously been. To note, this is the first survey which has reported severe levels of symptoms for depression.
- Between 55% and 61% of members feel that the PCC or similar is effective or very
 effective in complying with each of the 8 principles set out in the Accountability
 Guidance. Therefore, 39% to 45% feel the PCC or equivalent is not effective,
 particularly around the principles of "sharing information openly and transparently"
 and "demonstrating behaviours of mutual respect, trust and confidence".
- 72% of members reported that His Majesty's Inspector of Constabulary and Fire and Rescue Services (HMICFRS) inspections have had a negative impact on their wellbeing (42% slight negative, 30% negative).
- 75% of respondents cited pension scheme changes as a significant contributor to stress, up 17% from 2021 and 23% from 2018.
- 43% of members reported being more worried about their personal finances than they were a year ago, an increase of 18% from 2021.
- Work demands remain at the very high levels seen in both 2021 and 2018. 99% say
 that the role places them under a high level of demand (compared to 97% in 2021
 and 99% in 2018).
- 65% are expected to take on additional command duties e.g. CBRN, firearms and public order, down 2% from 2021.
- 82% reported that the excessive working breadth and depth of responsibility caused the excessive working hours, up from 77% in 2021.

33% of respondents feel their demands have risen by an excessive amount (up from 28% in 2021), 50% feel they have increased by a manageable amount (down from 58% in 2021) and 17% feel they have stayed the same (up from 14%).

Further evidence from that survey can be found within the orange boxes in this report.

Whilst most members enjoy a professional relationship with their PCC or equivalent, CPOSA is seeing more frequent examples of PCCs circumventing agreed processes that are in place to protect chief constables. The way the Mayor of London dealt with the end of Dame Cressida Dick's service saw criticism within a report by Tom Winsor. He concluded she was effectively 'constructively dismissed'. Despite this criticism, this method seems to be a now not infrequent way of exiting a chief constable and this cannot be right. We will evidence in this report the impact that has on our members and the need for the development of a severance package for those put in this position. This will be progressed through The Police Advisory Board for England and Wales (PABEW), but we seek the observations of SSRB.

We also found that PCCs do not always abide by the 8 high level principles of the jointly agreed accountability guidance, both generally and also following HMICFRS inspections. This will be explored further within the section on governance.

CPOSA is pleased that both pay reform for chief constables and deputy chief constables will be implemented fully in June 2025 and that the ability for members to choose rental accommodation in lieu of a full house move was implemented in January of this year.

Assessment of the efficacy of these reforms will take time, but an agreed dataset has been established with the National Police Chiefs Council (NPCC) to monitor this, with data available from Q1 of 2025.

Last year CPOSA submitted a proposal for an on-call allowance for both assistant chief constables and deputy chief constables. Following interaction with the NPCC, our submission is for an on-call allowance to be paid to assistant chief constables only and on an interim basis until their pay is assessed through pay reform. Taking account of the

introduction of pay point three for chief superintendents, the ability for those on that pay point to also benefit from temporary variable pay (TVP) and an on-call allowance, the differential is now marginal. CPOSA supports the Police Superintendents' Association (PSA) in having this pay level and allowances for its members, but we seek to ensure the increasing burdens being placed upon our members is recognised.

CPOSA is also progressing the removal of fixed term appointments for DCCs through PABEW and we seek observations from SSRB to enable us to take account of any matters the body highlights.

Despite the impacts described on wellbeing and also the high levels of dissatisfaction, motivation to do a good job remains high, sitting at 93%. The latest Affinity Health Survey showed that 95% of our members say they 'get a buzz' from working as a chief officer² with 96% agreeing that being in the police service is a vocation for them and 78% agreeing that being a chief officer is part of who they are.

It would be remis of me not to raise the concerns we have over the recommendations made in last year's SSRB Report to the Home Secretary. I do not intend to repeat all of the detail CPOSA put into our pre-action letter. We strongly believe that had the matter been subject of a more careful debate then the outcome may have been very different. We were most concerned that the issue was not subject of any request for evidence, was only marginally spoken about in the CPOSA oral evidence and was not discussed at all with the Association of Police and Crime Commissioners (APCC) who have employment responsibility for those affected and would make any decision in this matter. They had previously indicated their intention to CPOSA to look at the matter the following year. For these reasons, we are concerned at how recommendations that affect our members are developed, particularly as, unlike many other organisations, our members have very limited recourse to industrial action. Whilst CPOSA had its own concerns about application of PCC discretionary pay, further examination by the SSRB may have established that there are some forces who are finding it difficult to attract candidates. Within these forces a higher level of pay may attract

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² Affinity Health CPOSA Member Survey2024.

talented leaders that are needed to deal with critical performance or cultural issues. There is now no method the PCC can use to enhance the pool of candidates. In addition, there are a handful of deputy chief constables who are now 'hamstrung' as their pay is set higher than the lower band chief constables and only marginally lower than those in the middle band. There is therefore no incentive for them to move to the vast majority of chief constable roles.

CPOSA is therefore seeking the SSRBs observations in bringing in a replacement for the PCC discretionary pay that has tighter constraints linked to a desired outcome and that will be presented to SSRB at the next pay round.

CPOSA would like to thank the SSRB for the consideration of our written evidence and we look forward to discussing this in more depth at the oral evidence session.

During this report, we make the following recommendations and requests for observations:

Recommendation 1: This year's submission seeks a funded, 4.8% pay award for those officers CPOSA represents. We also believe that any pay award should be equally applied across all ranks.

Recommendation 2: CPOSA asks the SSRB to make recommendations to the Home Secretary to broaden the current scope and enable the payment of an on-call allowance to those assistant chief constables who perform operational on-call. This payment will be for an interim period until pay reform work is concluded and implemented for that rank.

Observation 1: SSRB is invited to make observations on the proposal by CPOSA that a replacement for PCC discretionary pay should be explored with any proposals made submitted to SSRB for the next pay round.

Observation 2: SSRB is invited to make observations on the proposal that CPOSA will suggest the work with PABEW is broadened to look at both a severance package where the officer has not achieved retirement age and where the PCC has failed to comply with legislation when seeking the removal of a chief constable.

Observation 3: We ask SSRB to make observations on the evidence presented to them on fixed term appointments for deputy chief constables to inform the debate within the PABEW.

Kate Meynell

CPOSA Negotiating Secretary

Methodology

Pay and Morale Survey - Autumn 2024

Undertaken in the Autumn of 2024, this was a joint pay and morale survey in association with the National Police Chiefs' Council. This online survey attracted 183 responses, with 145 from those officers under the remit of SSRB³. At the time CPOSA had 271 members whose pay is determined through this pay review body giving a response rate of 53.5%. At least one response was received from each of the 43 forces and there was good representation across ranks (see fig 1 below).

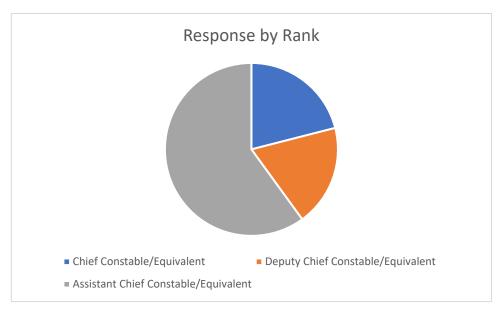


Fig.1 A chart illustrating response by rank.

Focus Groups

We arranged three focus groups, one each for chief constables, deputy chief constables and assistant chief constables. These member focus groups will inform the Senior Salaries Review Body by developing some of the areas highlighted within the online survey. These

³ The survey covers all members, not only those covered within the SSRB remit e.g. police staff, British Transport Police, Civil Nuclear Constabulary, Ministry of Defence Police etc.

discussions enable more in-depth evidence for some of the issues and allow more detailed description within each area.

CPOSA Wellbeing Survey - 2024

CPOSA facilitated the latest triennial wellbeing survey of members which was conducted by Affinity Health. The survey was independent and delivered by Affinity Health at Work which was formed in 2006 with an aspiration to partner academic rigour with practical, real-world approaches to improve health and wellbeing at work. The CPOSA research was led by Jo Yarker PhD, MSc, CPsychol with the assistance of researchers.

This is now the third survey with benchmark data available from 2018 and 2021. The survey comprised 239 responses, a 65.1 % response rate from the membership at that time with a good spread of regions, force banding, role, tenure, age and other demographic characteristics. Where relevant, the data within this survey has been used to support this submission. In light of some concerning information, CPOSA has agreed for Affinity Health to conduct annual pulse surveys to compliment the full survey which will continue to be held every three years.

A fact sheet highlighting key issues is attached at appendix A.

<u>CPOSA Members Survey – On-call Allowance</u>

A survey was undertaken of all members regarding the on-call allowance for the last pay submission which resulted in a very good response of 100 members. CPOSA has used this data to inform this year's submission relating to a claim for on-call allowance for assistant chief constables/commanders.

NPCC Survey on Applicants for Chief Officer Vacancies

The NPCC now gather the data for chief officer vacancies, so the information does not directly read across to the data CPOSA has gathered over the past few years. The data set has also been developed and will enable a critical review of the impact of the implementation of rental accommodation on mobility. This data will be collected from Q1 of 2025 and as such, we believe a full review should not take place until the submission of the 2027 evidence.

<u>Spot Survey – Pensions, the Implementation of Remedy</u>

Due to the significant concern raised about pensions in the main pay survey, a spot survey was undertaken to help understand how the implementation of the McCloud Pensions 'Remedy' is affecting members.

Additional Information

Documentary research has also been undertaken supported by meeting attendance throughout the year. Where appropriate, sources have been cited to enable provenance.

Pay Degradation

Chief officer pay has been in decline for many years and the following chart (see fig 2 below) shows pay awards when compared against CPI in September for each year 2010 to 2024.

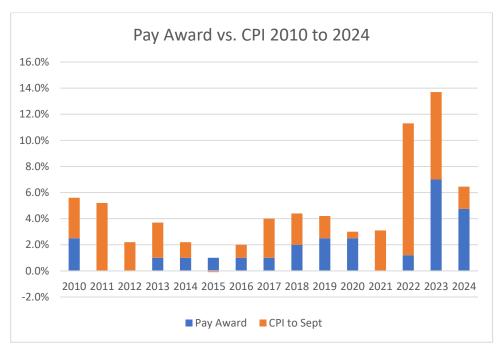


Fig 2. A chart showing annual pay awards vs. CPI in September of each year⁴

In 2021, our members, along with others in the service, saw no increase in pay whilst CPI sat at 3.1%. This was followed by a 'flat rate' pay settlement in 2022 which had a significantly disproportionate effect on chief officer pay. This award averaged 1.2% for our members against a settlement across the whole organisation of 5% with CPI that year standing at 10.1%. In 2023, the pay increase sat at just 0.3% above CPI and whilst last year's increase was welcomed, it has done little to impact the years of decline when compared against the cumulative rise in inflation.

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⁴ CPI taken from gov.uk and pay from the 2024 NPCC submission. 2022 is shown at average of 1.2% (pay award 0.6% to 1.8% for CPOSA members)

The Impact of Pay Reform

Direct comparison of pay vs. CPI is now difficult due to the impact of pay reform for chief constables and deputy chief constables. As members of SSRB are aware, there was a wide range of impact for those within reform with not all members seeing an increase and one outlier that seemed to draw an unhelpful narrative. Whilst there were increases for some, SSRB is reminded that one of the key outcomes sought within reform was to bring those two ranks in line with market comparators. Therefore, chief constables and deputy chief constables are not in a more advantageous position than other ranks, they have just been brought into line with those performing similar roles.

As a consequence, CPOSA has restricted comparison to ACCs to enable a direct comparison rather than consider the false baseline that would have been created for the chief constable and deputy chief constable ranks.

<u>Impact of Last Year's Pay Settlement</u>

Whilst last year's pay increase was welcomed, there is still a significant gap between actual pay increases and CPI. Fig. 3 below illustrates the significant pay decline over just the past four pay years.

Rank	Actual Pay	Had Pay Been	Actual Pay	Variance -	Variance -
	Sept 2020	Uprated by	Sept 2024	CPI vs Actual	CPI vs
		CPI to Sept		in £	Actual as a
		2024			%
Assistant Chief Constable –	£112,404	2024 f138,465	£128,177	10,288	% -7.4%

Fig.3 Pay comparison – actual vs. CPI

The impact has therefore been significant for members who have seen real term pay cuts for over a decade. Using the illustration above, this still equates to a real term reduction in salary of over £10,000 in just four years. As we argued last year, when you take account of the relative inexperience of executive leadership within policing and the projected attrition,

everything must be done to ensure the attraction and retention of talent. CPOSA believes the only way this can be achieved is by providing an over inflation pay award and closing the gap between CPI and historic pay awards.

Workforce, Pay and Reward

Introduction

Within the first section of our evidence relating to workforce, pay and reward, we will outline our evidence related to the experience, attrition and recruitment of the current chief officer cohort.

The second section will examine our members' satisfaction in base salary, pensions and the whole remuneration package.

The final section will provide our members' experience in relation to their motivation and wellbeing.

The data we present to you in this submission is worryingly consistent with our recent submissions to you and PRRB and it projects high attrition from an already inexperienced leadership. Members' satisfaction in remuneration remains incredibly low with only 42% describing their base pay as satisfactory or very satisfactory. In addition, satisfaction for pensions benefits has plummeted to its lowest ever level at 16% with over a third of respondents stating the overall remuneration package actually encourages them to leave.

CPOSA remains concerned at the short, medium and long-term impact upon policing and society should the pay of officers not increase to take account of the significant dissatisfaction with pay and allowances and the significant decline in pay over the past decade.

Experience

The following two charts provide evidence to show the relative inexperience of chief officers. Fig. 4 below illustrates the total experience our members have as chief officers and

highlights that 65% have less than five years completed service, this inexperience has worsened since our last submission when this figure sat at 55%.

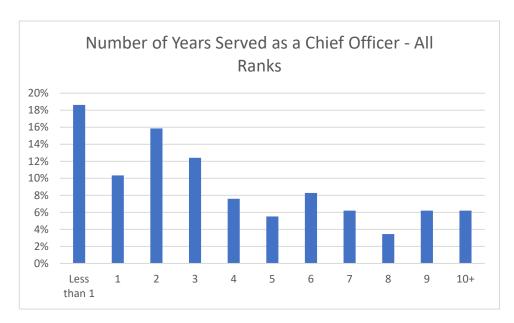


Fig.4 Years completed as a chief officer - all ranks.

Total experience as a chief officer is only part of the picture with fig. 5 below illustrating the significant level of inexperience within each rank. In detail, 52% of all chief constables have less than three years' experience at that rank, this increased to 70% for deputy chief constables and is also concerning for assistant chief constables, where 66% of those in post have less than three years' experience and 50% have less than two.

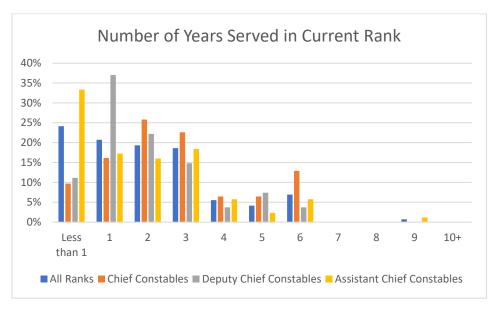


Fig.5 Years completed in their current rank – all ranks.

<u>Attrition</u>

Last year, we provided significant evidence of CPOSAs concern over attrition rates that compounds the evidence we have presented on experience. With the need for high quality leadership comes the requirement for retention, more so when the baseline of experience is so low. The number of members expressing their intent to leave within three years remains stable, with 42% saying they will do so compared to 43% reported last year. Those seeking to leave within five years has reduced by just over 5% but remains worryingly high at 65%.

Date likely expected to retire in	Chief Officers
Less than 1 year	8%
Between 1 year and 2 years	15.9%
Between 2 years and 3 years	17.9%
Between 4 years and 5 years	23.5%
Between 5 years and 7 years	11.7%
Between 7 years and 10 years	10.3%
Over 10 years	12.4%

Fig.6 When do chief officers intend to retire

At a time when policing needs the most talented and experienced leaders, the low level of experience combined with the high rate of attrition is of deep concern and we ask the pay review body to take this into account within any recommendations made to the Home Secretary.

What Members Feel Could be Done to Encourage Retention

- Allow me to retire and come back without freezing my pension.
- A more competitive remuneration package would significantly help reduce the attraction of leaving for more competitive options elsewhere.
- Increased remuneration, on call allowance, better retire/return scheme.
- More stability in the senior appointment system DAC/DCC and Chiefs.
- Address "pension trap" issues, make DCC appointments permanent, improve pay.
- Feeling valued by HMG, politicians and the public. Less toxic media. More realistic
 expectations on delivery in the current context. Less political interference in
 policing.
- The government saying they wouldn't mess with tax free pension lump sums. This is making me incredibly nervous and feeling like I have to leave before I am ready.
- More pay to reflect the responsibilities, sort the pension.
- Changes to avoid PCCs being able to remove a chief in the way some have recently.
- Nothing the demands of the job can't really be altered enough as it is the nature
 of the role.
- Consider common terms and conditions across forces and also make it easier to move between forces.
- A significant increase in pay.
- Disciplinary processes are poor it is almost as if the higher the position you attain the welfare support is very much undervalued and deprioritised. It appears to be the focus of concerted effort to go after senior officers.
- Pension clarity.

Box 1. Comments regarding retention

Recruitment

CPOSA remains concerned at the low number of applicants per role. The very limited data available for 2024, shows there were 2.5 applicants per ACC post and just one applicant for the one DCC role advertised.

This year has seen a different method of data collection led by the NPCC National Rewards
Team which will provide quarterly data seeking information on recruitment. Due to the
timing of the submissions this will only include two quarters of 2024. The data for the last
quarter should be available for oral evidence and the data set will have matured for the next
submission to SSRB and will have questions to assess the efficacy of the revised relocation
expenses that allow the provision of rental accommodation.

Due to the limited data available, it has been presented in written form but with the support of previous data in graph form. We will also talk about long term trends rather than draw inference from the most recent data.

The data collected between Apr24-Sep24 is illustrated in fig. 7 below and shows:

- There were 17 jobs advertised for assistant chief constables.
 - o There were 28 external applicants and 16 internal applicants for these roles.
 - There was therefore a 2:5 ratio of applicants against the jobs advertised.
- The rank of deputy chief constable had 1 job advertised with 1 internal applicant.
- There were no roles advertised for chief constables.



Fig 7 Applicants per post Q2 and Q3 2024

In last year's submission, we highlighted data from 2011 which gave the SSRB a more informed picture of the long-term trend. This data is replicated below

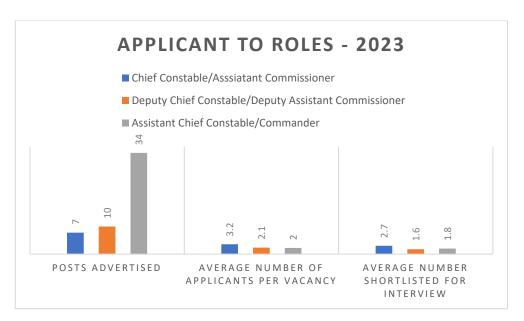


Fig. 8 Applicants for roles

Last year, there were just 3.2 applicants for each chief constable role advertised with 2.7 candidates being shortlisted. There were less applicants for both deputy chief constable and assistant chief constable roles with 2.1 and 2 applicants per role advertised respectively. Once shortlisted, there were just 1.6 applicants per deputy chief constable role and 1.8 for each assistant chief constable.

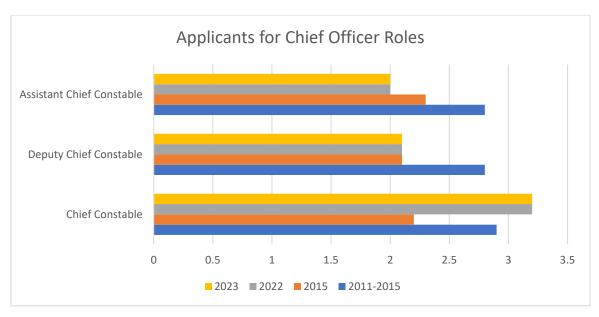


Fig. 9 Applicants for chief officer roles over time

Base Salary

Satisfaction with base salary (see fig. 10 below) has been on a downward trajectory since 2017, taking a significant drop in 2022 and in 2023, when just 36% of respondents said they were either satisfied or very satisfied with base pay. Whilst there has been a very slight increase to 42% in 2024, the sustained drop from the levels of satisfaction seen between 2017 and 2021 causes CPOSA concern and illustrates how the protracted pay restraint is significantly impacting on members.

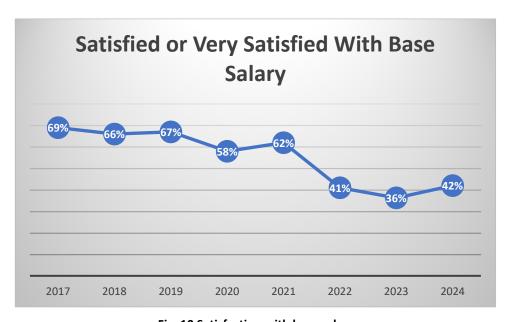


Fig. 10 Satisfaction with base salary

Comments by Members About Base Salary

- Poor when you look at comparable roles within the LA, who don't do 24/7 cover or carry the risk with Gold/SFC decisions.
- I think the base salary, following the recent uplift for DCC/DACS to reflect a proportion of CC's salary is now fair and reasonable.
- I have huge responsibility and a good degree of personal liability whilst remuneration is not everything police senior wages have not kept up with either the private sector or the civil service.
- There are several senior jobs which cannot be filled because of the risk of moving into 5-year contracts where the PCC makes the job completely untenable.
- When I compare my base salary to others, whether in private or public and the differential, especially when risk management levels are considered, seem to be growing.
- I do not believe the current salary level is commensurate with the workload and level of risk that we are responsible for.
- It provides my family with a comfortable existence.
- The jump from C/Supt to ACC is smaller since the uplift in pay to C/Supt's which I personally benefitted from. I also complete more on-call duties as ACC than I did as C/Supt and there is no additional remuneration for this as Chief Officers. I expect to be doing more hours as a Chief Officer which I found that to be the case, that including the additional on-call duties means that I don't feel that I have made the gain I should have in being promoted.
- The pay at ACC rank has been significantly eroded by inflation and, for the level of responsibility, it does not appear to align to the market for this type of role.
- Whilst I do not think we are poorly paid I believe we are paid less than comparable
 jobs in other areas of the public sector. I also believe we should be paid for on call
 duties which often take place on our rest days.

Box 2. Comments by members about base salary

PCC Discretionary Pay

Following recommendations by the SSRB, the Home Secretary removed the power of PCCs to vary the pay of chief constables in September 2024. CPOSA is concerned about the removal of this power both in terms of process and impact. During our survey we found around half of respondents are still in receipt of discretionary pay, with 15 receiving between 6% and 10% as the revised regulations only affect new appointments.

CPOSA has long been concerned over the power of a PCC to vary the base pay of a chief constable. It was evident the decisions as to whether to vary pay were inconsistent across the Country and there were also agreements outside of Police Regulations that promised a future increase, subject to achieving performance targets. That said, CPOSA believes that a more informed consideration last year may have enabled a regulation that would permit a PCC to vary base pay within tighter constraints that would have been compatible with pay reform.

As an example, it will now be very difficult to attract the best candidates to a force that is having significant performance or cultural problems if their pay is set as the same as a force that is on a steady course. In such circumstances, you would want to attract proven leaders with an established track record to lead a struggling organisation through the change that would be needed to get it back on track. Sadly, there are now no options open to a PCC that would enable a differential in pay to attract the best people.

In addition, there are a handful of deputy chief constables who will now not have the incentive to apply for the vast majority of the chief constable roles in the Country. This is because their pay is greater than chief constables pay in the lower band and only marginally lower than chief constables in the middle group. This is a great shame as their experience would be an asset to that wider range of forces.

To address this gap, CPOSA would like to draw up a replacement for the now defunct provision that includes an element that will enable a PCC to add a discretionary amount but

within defined criteria that ensures it is only used to recruit and retain experienced leaders in exceptional circumstances.

Observation 1: SSRB is invited to make observations on the proposal by CPOSA that a replacement for PCC discretionary pay should be explored with any proposals made submitted to SSRB for the next pay round.

Pensions

Satisfaction with pension benefits has plummeted to an all-time low with just 16% stating they were either satisfied or very satisfied and is even lower than the then all-time low of 29% recorded in 2023. Pension benefits and taxation is a consistent theme within CPOSA surveys and subsequent submissions to the pay review bodies. This year, members have also had to contend with being informed of their revised pensions benefits, pensions tax impact and owed contributions as a result of the McCloud Remedy. A survey conducted by CPOSA in January 2025 highlighted that around a third of respondents are still waiting for some of the information that will give them certainty regarding the value of the scheme to them in retirement. As context, we have members who were not able to accurately fill in their tax returns that had a deadline of 31st January 2025 as pensions administrators had not provided the information required. We believe that whilst satisfaction in benefits have seen a significant decline since 2017, the most recent year is likely due to the lack of clarity around the true impact of McCloud – the revised tax implications, interest owed and benefits accrued.

SSRB is reminded that the revised HMT rules on pension taxation was welcomed by members, but they are still impacted by residual liability for historic annual allowance breaches which will significantly reduce their pension in retirement.

Fig. 11 below depicts the declining level of satisfaction between 2017 and 2024, with fig. 12 breaking the data down by rank.

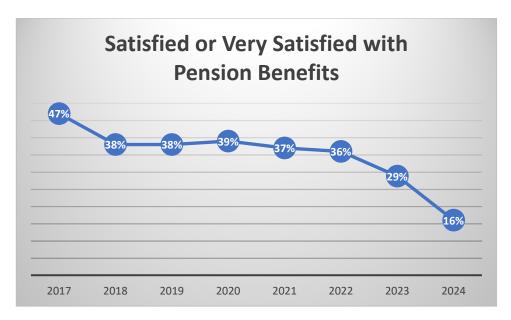


Fig. 11 Satisfaction with pensions benefits

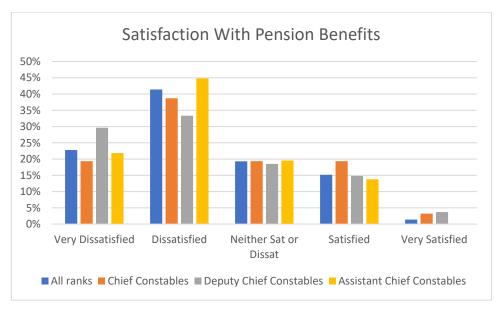


Fig. 12 Pensions satisfaction level by rank

The data is supported by free text commentary from the annual survey conducted by CPOSA. Box 3 below draws out some of those comments which highlight the concern over the lack of information around the impact of McCloud and also concerns over residual pensions benefits. It also includes comments by those satisfied with their pensions provision.

Comments Regarding Satisfaction with Pension Benefits by Member

- Don't know whether I am coming or going. Concerns it'll change again at some point and the recent issues with having to pay the gap to re-join 86 scheme.
- I don't know what my benefits will be. I still don't have my RSS and I have asked twice for benefits estimates and received nothing from XPS.
- Changes to the pension and the tax regime have undermined the value of my pension.
- Being financially penalised for retiring before 55 is unfair, given the hours given, which completely obliterate any home life/ health etc.
- Whilst I am pleased that we have more choice now in terms of the McCloud judgement, it has left many of us in a very uncertain and confusing position.
- The impact of transfer to the CARE scheme has negatively affected my pension benefits.
- I think it is a good pension scheme subject to tax rules not changing of course!
- The tax changes over the last 10-15 years have greatly reduced the real terms value of my pension.
- The changes to taxation in recent years dissuades from remaining in service beyond the point where you can provide useful service with experience in the rank.
- Overly complicated, unnecessary changes that mean I need to work for longer than first anticipated.

Box 3. Free text comments on satisfaction with pensions benefits

CPOSA asked Affinity Health to explore a wide range of issues, and these reinforced the concerns members expressed internally. Box 4 below provides the data from their survey that describes the impact of pensions on wellbeing.

Affinity Health Survey - Findings on the Impact of Pensions on Provision on Wellbeing

- 75% respondents cited pension scheme changes as a significant contributor to stress, up 17% from 2021 and 23% from 2018.
- 83% cited tax liabilities as a significant contributor to stress (76% in 2021 and 73% in CPOSA 2018).
- 43% of members reported being **more worried about their personal finances** than they were a year ago, an increase of 18% from 2021.
- 72% reported being **concerned that they will have to work for longer** due to changes in pension arrangements, an increase of 20% from 2021.
- The decrease in pension provision was again noted in the top two areas of particular concern by respondents.

Box 4. The impact of pensions on wellbeing

Overall Package

Members are in receipt of additional benefits to their base pay and as in previous years, the survey has found them all to be within permitted rules and are not being used inappropriately. PCCs and chief constables are restrained in legislation to pay only those allowances permitted in Police Regulations or those agreed by the Home Secretary.

In addition to the restrictions, there is also transparency as, in line with other public sector colleagues at our level, all pay and allowances are required to be published in the annual accounts of the organisation.

Our survey highlighted that 97% of respondents had the benefit of a car, lease car or car allowance. The next highest category of payment is medical insurance with 14% of members having such an allowance paid. There are many business benefits for organisations who include a medical provision, one of the main ones being a speedier return to full fitness of someone in a critical role should a member become ill. The NPCC has included the payment of such an allowance in their programme of the review to ensure consistency across forces. The 'other' category was selected by 9% of respondents and

includes items such as broadband, a security alarm etc. Three percent of members said they receive no additional benefits.

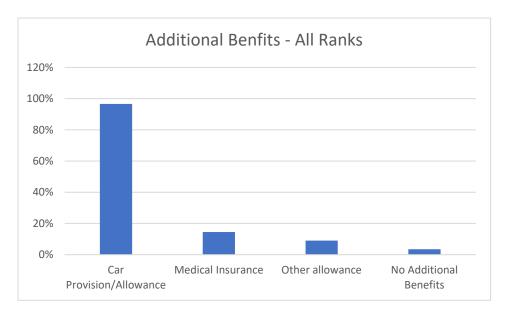


Fig. 13 Additional benefits

Satisfaction with the overall package (see fig. 14) continues to be significantly lower than its peak in 2019/2020 where it sat at 60%. We recorded the lowest level in 2023, where just 35% responded by saying they were satisfied or very satisfied with their overall remuneration package. This year has seen continued dissatisfaction with just 37% recording that level of satisfaction. This report gives substantial evidence as to why this is the case showing the correlation between dissatisfaction and the widening gap between base pay and inflation. The continuing erosion of pension benefits is also a major factor of concern in that the overall package no longer remunerates members for the challenges and responsibilities their roles attract. As mentioned within the pensions section, members are incredibly frustrated with the response to the McCloud judgement, and we are convinced a degree of dissatisfaction is due to the uncertainty that brings.

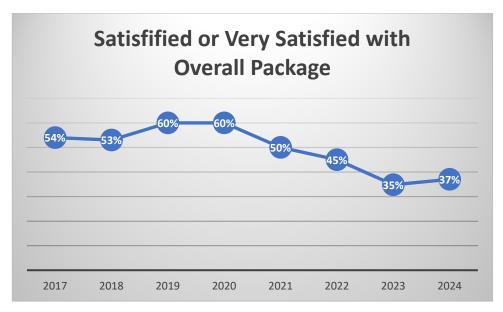


Fig.14 Satisfaction with overall package

Members were asked for comments on their satisfaction with the overall package available to them. Some comments are presented in box 5 below.

<u>Comments Regarding Satisfaction – Overall Package</u>

- Overall, I feel that we are paid at the low end of comparative scales, the car allowance – soon to be replaced with car – and eventual pension benefits to make a difference, but it still seems low when compared to the risk.
- I do not get and remuneration for being both a SFC and a POPS gold as well as chairing SCGs as am MAGIC trained together with the levels of accountability and org and personal risk.
- Whilst well paid I am not sure that this properly compensates for the work, responsibility and stress.
- Overall package would be fine- the issue for me is the pension arrangements
- I would like consideration for other benefits such as medical which would perhaps take the package closer to equivalent executives outside of policing
- It is simply an unattractive package for an executive level commensurate to the responsibility, scrutiny and expectation.
- I think I am reasonably remunerated for my role although not as well as other similar public sector colleagues.

- I am worth much more when compared to other agencies / depts particularly in respect of the threat and risk I carry.
- Given the state of public finances, my remuneration package seems reasonable
- Other forces get add-ons such as private health care, we get provided a vehicle which is a taxable BIC, there needs to be a more level playing field with this.
- Overall, a reasonable package.
- On top of an excessively busy portfolio (previous role had 10500+ staff and a budget of £500m) I also do cadre work for Public Order and Firearms. There is no financial compensation for these additional duties.

Box 5 Comments by members on overall package

One of the questions we ask our members seeks to identify the effect the overall package has on their intention to leave. In 2022, 44% of respondents believed the overall remuneration package encouraged them to leave the police service. Whilst it has reduced over the past two surveys, there are still over a third of our members who feel the package encourages them to leave. This remains a significant concern, and we retain our position that the aggregated negative impact on overall remuneration is seriously affecting retention.

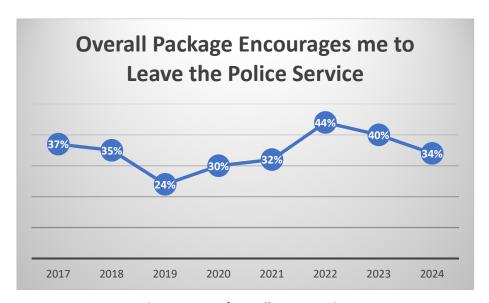


Fig.15 Impact of overall remuneration

Motivation and Wellbeing

Some argue that policing shows its best side when it is up against it. As with previous surveys, we asked our members 'On a scale of one to ten, with 1 being extremely low and 10 being extremely high, how motivated are to do a good job'. The previous three years have shown a decline from a high in 2021 where 97% scored 8, 9 or 10 to 89% in 2023. It is pleasing to see that motivation levels have increased from last year although they still fall behind both 2021 and 2022.

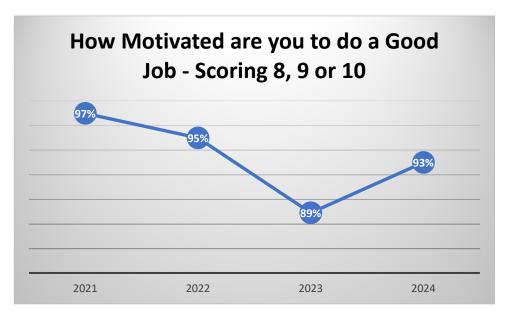


Fig. 16 Member motivation

The latest Affinity Health Survey showed that 95% say they 'get a buzz' from working as a chief officer⁵ with 96% agreeing that being in the police service is a vocation for them and 78% agreeing that being a chief officer is part of who they are.

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⁵ Affinity Health CPOSA Member Survey2024.

Working Hours

Analysis of the data⁶ shows that in 2024, 40% of members worked in excess of 60 hours a week with 4% saying they worked in excess of 70. Fig. 17 below illustrates the hours members worked during the reporting period, broken down by rank.

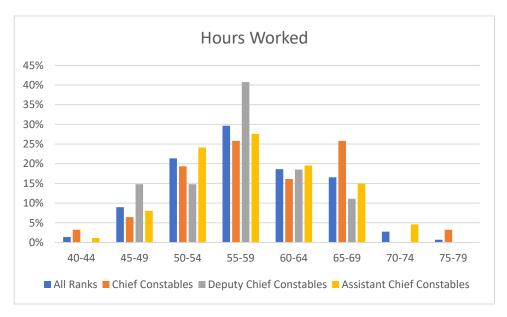


Fig. 17 Hours worked by members

As can be seen in fig. 18 below, just 35% of members describe themselves as being either satisfied or very satisfied with their working hours a figure stable over the past three years but those followed a steep decline in 2021 where levels sat at 51% seen.

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⁶ NPCC/CPOSA Pay and Morale Survey 2024.



Fig. 18 Satisfaction with working hours.

The recent Affinity Health Survey examined the impact of working hours on our members.

The key findings for demand, working hours and work-life balance can be found in box 6 below:

Affinity Health Results Demand, Working Hours and Work-Life Balance

- 3% reported working in excess of 70 hours a week.
- 25% are working in excess of 60 hours a week.
- 58% are working 50-60 hours a week
- Only 54% agreed they are able to balance the demands of work with what they and want and need to in non-work time.
- Only 12% of people agreed the demands placed in chief officers are commensurate with normally working less than 48 hours a week, down from 14% in 2021.
- 53% report their line managers work reasonable hours themselves, down from 62% in 2021.
- 82% reported that the excessive working breadth and depth of responsibility caused the excessive working hours, up from 77% in 2021.

- Only 56% agree that their Chief Officer colleagues reinforce the importance of work-life balance through their behaviour.
- Only 42% agree their chief officer colleagues work reasonable hours themselves.
- Work demands remain at the very high levels seen in both 2021 and 2018. 99% say that **the role places them under a high level of demand** (compared to 97% in 2021 and 99% in 2018). One positive change is that people still felt that the meetings they attended were productive and had real purpose (68% compared to 69% in 2021 and 62% in 2018).
- 33% of respondents feel their **demands have risen by an excessive amount** (up from 28% in 2021), 50% feel they **have increased by a manageable amount** (down from 58% in 2021) and 17% feel they have stayed the same (up from 14%).
- 94% of respondents feel that the demands of their role ensure they do need to take work home to complete outside of working hours (up from 85% in 2021).
 One respondent noted that they often use annual leave days to catch up on paperwork at home.
- Increased job demands was again the third highest area of concern this year (behind the impact of external influences, such as inspection regimes or political interference and the decrease in pension provision, the same areas as in 2021).

Box 6. Demands and working hours

The findings of the Affinity Health Survey support the evidence from the annual CPOSA survey in which members were asked for their reasons for the level of satisfaction they have with the hours they work. A selection of comments is shown in box 7 below.

Comments on the Hours Worked

- Work/life balance has definitely taken a hit in the last year.
- I simply don't have a work life balance. I find it disgraceful that consultant Drs are able to charge the public purse 10s/ 100s of thousands for additional shifts and work but Chief Officers have to absorb reduced resilience, increased workloads and due to the critical and vital nature of our role simply have to work longer and longer hours.
- Amount of hours worked does not include being on call 24/7 for CC authorities.
- It's long hours and hard work but that's the job!

- The most significant factor is on call I work 7 days on call in every 4 weeks.
- On call is on top of these hours and is 1 week in 4. It's not only the hours but the work-related stress thinking about issues out of hours.
- The load is ever increasing, particularly for those who pick up heavy national roles. What is hard to calculate is the time that you spend thinking about work.
- I expect to work longer hours and I love policing, but we are not treated fairly.
- This is a balance of trying to do the role as best as I can and ensuring visibility/accessibility to staff.
- I am doing this on a Sunday (RD). It is rare that I am not required to work on a RD to catch up with work, in addition to long working hours in the week.
- On-call for ACC's is a big burden on us, a lot of us also support events which takes a lot of planning and commitment (often on top of the day job).
- Work life balance is out of kilter with the demands upon us.

Box 7. Comments on satisfaction with hours worked

Sickness and Wellbeing

Whilst we mention the Affinity Health Survey throughout this report, this section contains some of the most concerning facts. Those leading the research for us stated the CPOSA 2024 levels of anxiety and depression are even higher now than they were during Covid-19, particularly the symptoms of anxiety among respondents. The improvement seen in the general population and improvement in wellbeing of NHS healthcare professionals is not being seen in CPOSA members.

Despite this, the CPOSA annual survey shows that 89% of members have taken no sick leave meaning most are staying in the workplace despite the concerning mental wellbeing impact highlighted by Affinity Health. Fig. 19 shows the number of sickness days members have taken.

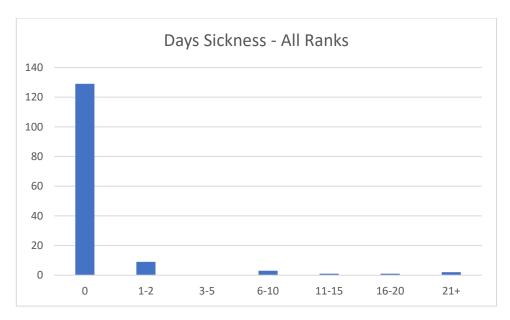


Fig. 19 Day sickness - all ranks

Affinity Health reported that whilst sickness levels were low at the time of reporting, there are several factors that have a negative impact under the following headings:

- The working environment
- Culture and behaviours
- Demand, working hours and work-life balance
- Being under investigation
- Financial concerns
- Additional duties
- The inspection regime
- The behaviours of some in governance positions

Box 8 below highlights the data relating to the levels of depression and anxiety our members are suffering.

Member Wellbeing

- 47% of respondents were classed as showing 'normal' levels of symptoms for anxiety (down from 73% in 2021 and 61% in 2018). Mild (29%), moderate (15%) and severe (8%) levels of anxiety are all higher than in both 2021 and 2018, using the HADS measure.
- Levels of depression are also higher than in previous years. 74% are classed as showing 'normal' levels of depression (down from 82% in 2021 and 79% in 2018). Mild (20%), moderate (5%) and severe (1%) are all higher than they have previously been. To note, this is the first survey which has reported severe levels of symptoms for depression.
- It is also noteworthy that 72% of members reported that HMICFRS inspections have had a negative impact on their wellbeing (42% slight negative, 30% negative)
- The CPOSA 2024 levels are even higher now than they were during Covid-19, particularly the symptoms of anxiety among respondents.
 The improvement seen in the general population and improvement in wellbeing of NHS healthcare professionals is not being seen in CPOSA members.

Box 8. Affinity Heath - wellbeing

Such is our concern with this and other data within the survey that we have written to the following bodies seeking urgent meetings and to enable a joint approach to create a better and more supportive working environment. Those being spoken to are:

- The Home Secretary
- The APCC
- HMICFRS
- The College of Policing and Oscar Kilo (National Welfare)
- The NPCC
- The Independent Office for Police Conduct (IOPC)

Once we have met with all parties, we will draft an action plan and report back to our committee. We have also decided to conduct annual pulse surveys to complement the full survey conducted on a triennial basis.

As a staff association, we also provide:

- A Peer Support Network.
- Working with Oscar Kilo we have introduced a mental health support line alongside the Police Superintendents' Association.
- Working with the APCC to implement a mediation framework and clarity on chief constable accountability.
- Transition into retirement planning and wellbeing.

Governance

Whilst most members enjoy a professional relationship with their PCC or equivalent, we are seeing more frequent examples of PCCs circumventing agreed processes that are in place to protect chief constables and also in behaviours towards members.

The Affinity Health Survey highlights some of the concerns members have with PCCs/mayors or policing bodies. These include:

- 28% of members either disagreed or strongly disagreed when asked whether the
 PCC or similar abided by the 8 high level principles within the Accountability
 Guidance when holding the chief constable to account during HMICFRS inspections
 and upon subsequent publications.
- 2. When asked "How confident are you that the PCC would work with you to resolve issues at the earliest stage rather than using the powers they have to require you to retire or resign", a significant number (43%) said they were only slightly confident (35%) or not at all confident (8%).
- 3. More generally, between 55% and 61% of members feel that the PCC or similar is effective or very effective in complying with each of the 8 principles.
- 4. Therefore, 39% to 45% feel the PCC or equivalent is not effective, particularly around the principles of "sharing information openly and transparently' and demonstrating behaviours of mutual respect, trust and confidence.

In addition, there were several comments on PCCs made within the CPOSA annual survey, mainly relating to retention. Some of these have been replicated in box 9 below.

Free Text Comments by Members on Governance

- There are several senior jobs which cannot be filled because of the risk of moving into 5-year contracts where the PCC makes the job completely untenable.
- I have at least 10 years to go in policing, more likely 14. I could make a very significant contribution during that time, but I have to weigh that against the responsibilities to my family. Policing at ACC, let alone DCC, level carries significant personal risk. If the issue was not my performance (for which I could be removed from the role in any case) but a clash with a CC or PCC over some personal or political issue that meant my contract was not renewed, I would be hugely disadvantaged not just immediately but through the impact on pension benefits (particularly when it could be taken).
- Regarding retention My family and the uncertainty of retaining your job with the current PCC structure giving authority and budget to generally ill-informed politicians.
- With the pension now being 40 years, it will be a gamble for anyone risk taking on a contract as there is no assurance of keeping a job, particularly with PCCs who do like change!!
- Changes (needed) to avoid PCCs being able to remove a chief in the way some have recently.
- Impending reform, PCC behaviour and workload stressors, push me more towards leaving earlier.

Box 9. Free text comments regarding governance.

Within England and Wales, both the relationship and safeguards are contained within the Police Reform and Social Responsibility Act 2011 and the Policing Protocol Order 2023.

Amongst other things, this legislation provides:

- How a chief constable must be appointed.
- How, if necessary, a chief constable will be required to retire or resign.
- The need for a constructive relationship.
- The requirements of each role, chief constable and PCC.
- The need for the chief constable to be operationally independent.

In September 2022, Sir Tom Winsor delivered his report following the Special Commission on the Resignation of the Commissioner of Police of the Metropolis. In it he noted:

'Due process was not followed by the Mayor of London and the Mayor's Office for Policing and Crime in their taking of actions which led, on 10 February 2022, to Dame Cressida Dick stepping aside as Commissioner of Police of the Metropolis. The Commissioner is not an employee of the Mayor, but she was in effect constructively dismissed by him'.

Despite that publication, CPOSA has recently been involved in several cases where PCCs have mirrored the behaviours criticised within that report. This now appears to be an established tactic where PCCs will give a chief constable a limited period, perhaps 24 hours, to agree to either resign or have a public declaration of no confidence. CPOSA has no doubt that such practices flagrantly breach the legislation in place to protect chief constables. Such safeguards are essential for those in a role that naturally will, on occasion, come into conflict with those who politically govern them. We are also convinced such behaviours impact on the recruitment and retention of those that lead the organisation.

CPOSA has previously submitted evidence that illustrated the need for the introduction of a compensation mechanism where PCCs failed to comply with the requirements of asking a chief constable to retire or resign. PABEW has agreed for a working group to be formed to look at the current provision for compensation for chief officers who have not achieved retirement age and who do not have their fixed term appointment (FTA) renewed. CPOSA will suggest this is broadened to look at a severance package where the PCC has failed to comply with legislation when seeking the removal of a chief constable.

Whilst members accept the operational risk undertaking chief constable and other chief officer roles, there must be effective safeguards. Where these safeguards are abused by politicians, the impact upon members' career choices is significant.

Observation 2: SSRB is invited to make observations on the proposal that CPOSA will suggest the work with PABEW is broadened to look at both a severance package where the officer has not achieved retirement age and also where the PCC has failed to comply with legislation when seeking the removal of a chief constable.

Mobility and Relocation

Introduction

CPOSA is pleased the pay review bodies have enabled the introduction of pay reform for chief constables and deputy chief constables as well as the changes to the relocation allowance that permit rental accommodation, where there are personal circumstances that prevent the full relocation of a candidate for promotion or lateral transfer. CPOSA has agreed a method of monitoring the outcomes of these changes, particularly with regard to enhanced mobility.

This section examines the evidence presented by members on mobility, both for lateral transfer and also on promotion or for higher pay. The survey was conducted before the introduction of the reformed relocation allowance which came into effect on 1st January 2025.

Within fig. 20, the willingness of members to apply for a role on a level transfer is examined. There are some minor variances with last year's results but nothing that is worthy of note taking account the reform currently underway.

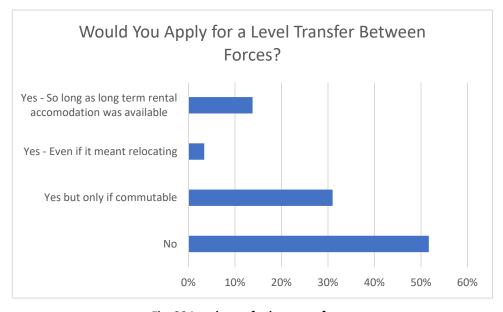


Fig. 20 Level transfer between forces

Likewise, the responses from members seeing willingness to move on promotion are broadly similar to last year, but with 27% stating they would move if there were the availability of rental accommodation; we are therefore hopeful of increases in applicants for jobs. We must recognise however, that other variables will come into play such as the role, the force and who they will be working with so more work will need to be undertaken to get into the detail of the figures the new dataset will give us.

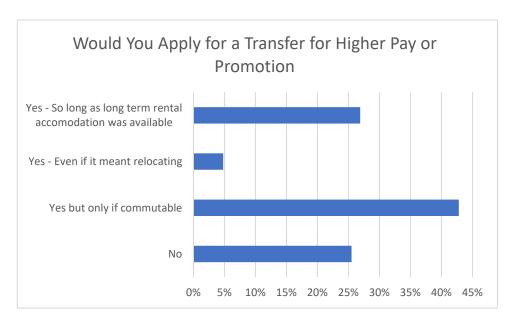


Fig.21 Mobility on promotion or for higher pay

Again, members were asked their reasoning for the blockers that prohibit them moving forces. These are similar to last year and can be broadly characterised as:

- Settled family life.
- Caring commitments.
- Family/childcare commitments.

On Call Allowance

Last year, CPOSA recommended the payment of an on-call allowance for ACCs and DCCs. Since that submission, the NPCC has debated the subject and had rejected our call for such an allowance to be paid. Their rationale is that chief officers should have the element of on call built into base pay. They also highlighted that chief constables and deputy chief constables have just been through pay reform and as such those ranks will have had their role assessed for the new pay bands. They further state that ACCs will be subject of pay reform, and they believe the on-call element should be built in, however, there is no timescale for this work.

Whilst CPOSA accepts the NPCC position for chief constables and deputy chief constables, it strongly believes that an on-call payment must be available for ACCs until such time as their pay reform is concluded.

Since the introduction of the chief superintendent pay point three (PP3), the difference between the highest pay point for them and ACCs has reduced to around £9,000. In addition, chief superintendents will be able to have up to £5,000 under the bands for TVP presented at PRRB. If you add to this the ability for chief superintendents to claim an on-call allowance, you can understand why some of our members who have recently moved from those ranks question the financial differentiation between their roles. To be clear, CPOSA fully supports the PSA and NPCC for the TVP bandings but also seeks to ensure that our members and those who should be attracted to the ACC ranks are not impacted by the cumulative effect of PP3, TVPs and the payment of an on-call allowance. These impacts will be explored within the ACC pay reform, but in the interim, CPOSA seeks for ACCs to be included in the regulations that permit the payment of an on-call allowance.

CPOSA seeks payment of the on-call allowance for those ACCs who undertake operational on call such as Strategic Firearms Commander, Chemical Biological Radiological Nuclear Commanders, Public Order Commander and Force Gold.

It is clear from CPOSA's research that payment of the allowance is needed and can be achieved at relatively little cost. This paper gives a significant evidence base as to why this allowance is relevant for payment as outlined above.

Current Regulations and Determinations

The following determination to regulations authorises the payment of an on-call allowance for those up to and including superintending ranks:

ON CALL ALLOWANCE

a) A member of the rank of constable, sergeant, inspector, chief inspector, superintendent or chief superintendent shall receive an allowance of £20 in respect of each day on which they spend any time on-call.

b) In sub-paragraph (a) "day" means a period of 24 hours commencing at such time or times as the chief officer shall fix after consultation with the branch board and the elected officials of the local Police Superintendents' Association Branch, and the chief officer may fix different times in relation to different groups of members.".

The Evidence Base

CPOSA undertook a survey of members for the last pay submission. We have decided to keep all of the information within this submission despite now only seeking for payment to ACCs. This will enable members of SSRB to better understand the impact and depth of feeling across all ranks. One hundred members responded which is indicative of the strength of feeling around this issue.

In addition, we have included the relevant evidence from the independent Affinity Health Survey in box 10.

Additional Responsibilities and Demand

- 65% are expected to take on addition command duties e.g CBRN, firearms and public order, down 2% from 2021
- 69% are required to take on Gold Command Duties, down 3% in 2021
- Only 36% felt there is appropriate consideration of the workload impact of these additional responsibilities, down from 47% in 2021 with 11% indicating strong disagreement that workload impact is considered
- 25% are working in excess of 60 hours a week
- 58% are working 50-60 hours a week
- Only 54% agreed they are able to balance the demands of work with what they and want and need to in non-work time
- 82% reported that the excessive working breadth and depth of responsibility caused the excessive working hours, up from 77% in 2021
- Work demands remain at the very high levels seen in both 2021 and 2018. 99% say that the role places them under a high level of demand (compared to 97% in 2021 and 99% in 2018)
- 33% of respondents feel their **demands have risen by an excessive amount** (up from 28% in 2021), 50% feel they **have increased by a manageable amount** (down from 58% in 2021) and 17% feel they have stayed the same (up from 14%)
- 94% of respondents feel that the demands of their role ensure they do need to take work home to complete outside of working hours (up from 85% in 2021).
 One respondent noted that they often use annual leave days to catch up on paperwork at home
- Increased job demands was again the third highest area of concern this year (behind the impact of external influences, such as inspection regimes or political interference and the decrease in pension provision, the same areas as in 2021).

Box. 10 – Affinity Health – responsibilities and demands

Respondents

Fig. 22 below, illustrates the response by rank with almost 60% from ACCs.

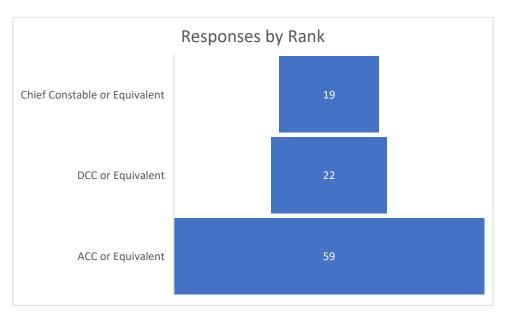


Fig. 22 – Responses by rank

Who undertakes on-call?

CPOSA then sought to better understand who undertakes on call. On call is undertaken by most at all ranks with the most operational being at ACC rank and some at DCC where the role of Force Firearms/Public Order is most likely.

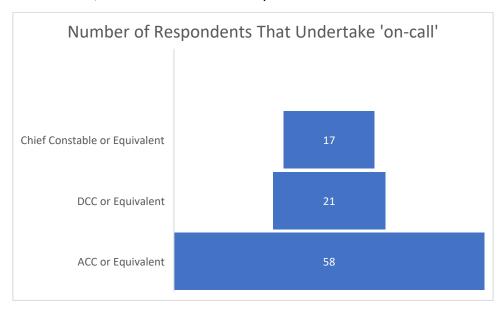


Fig.23 - Who undertakes on-call

The Impact of On Call on Non-Working Time

One of the main arguments for the broadening of the on-call allowance to ACCs is the significant impact upon the private lives of members.

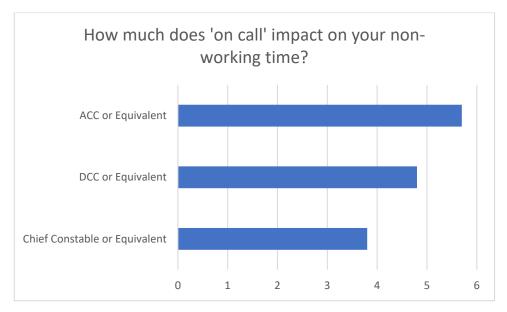


Fig.24 Impact upon non-working time

Again, the impact on non-working time decreases with an increase in rank which we are sure reflects the frequency of interaction whilst on call. The range was between 1-7 and therefore a score of almost 6 indicates a very significant impact.

Members were asked to comment on the impact of being on call.

- Cannot travel, cannot undertake normal activities with the family as need to be available to travel at short notice.
- Being on call for firearms/public order and gold inevitably means being woken (and family) during the nights and no plans can be made in the evenings due to being called away.
- As NPCC On call (Gold London) I am regularly called throughout the night and have grip calls in the evening. As Public Order Commander I normally have to come into London so am not at home at all. Last week, for example, as the in-force Gold I spent over 75 hours in the SOR in 6 days.

- Need to constantly carry 2 phones. Need to constantly be cognisant of charge, signal etc. Regularly speaking with duty officers for update. Interruption of sleep. Need to be within travelling time/distance to HQ. Causes periods of distraction and lower quality interactions with friends/family. Can impact benefits of being away from workplace by focusing on work-based matters when at home or on days off.
- Ability to undertake rest and recovery activity, leave the force area, shut off. Limits my ability to travel out of force. For CT must be within 20 minutes of my car so limits what I can do with family and can't go in the same car. Probably averages on call 3 out of 4 weekends when you add it all up.
- Working throughout the evening and night on almost every occasion. Waking the
 whole family up during the night when I am called. Unable to be far away from
 home / involved in family / social events. Unable to recoup the hours or take days
 off to recover.
- Restricted to XXXX (county), must be attached to the phone, not drink, and difficult to relax, and must work over the rest days as on call.

Box 11. Free text comments – impact of on call

Should there be parity with other ranks for the payment of an on-call allowance?

As it can be seen in the chart below, the majority of those at both the ACC and DCC rank believe there should be parity in the payment of an on-call allowance. For chief constables a majority replied either 'no' or 'maybe'.

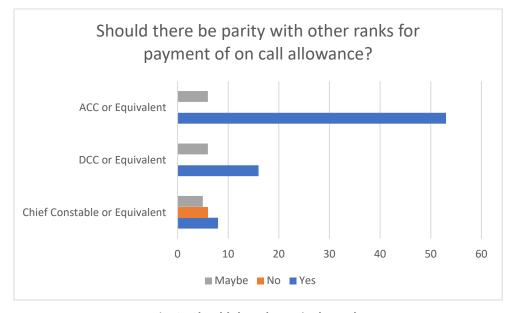


Fig. 25 Should there be parity by rank.

This was explored in more detail by asking how strongly people felt there should be parity, by rank. Again, I the 7 scale was used and the strength of feeling declined the higher the rank.

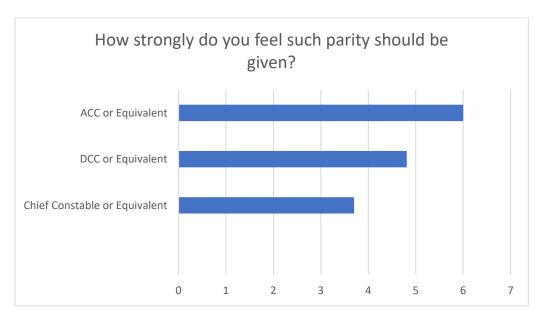


Fig. 26 Strength of feeling by rank.

Members were asked to comment on why they answered this question the way they did.

ACCs are the most vocal with regard to the need for payment of the allowance. Their responses included:

Strength of Feeling Regarding Parity – ACCs

- The impact is no different and the parity is clearly not there.
- On call usually involves significant risk, it is highly disruptive and the two-tier system is unfair.
- Because on call responsibilities for command (firearms and public order) hold a
 great deal of jeopardy and the nature if being on call on a rota is very disruptive to
 my normal routine at home. Basically, the day (and night) is not my own.
- As a chief officer I have more breadth of coverage within role than that of the superintending colleagues and also do on call for public order, firearms and CBRN but receive no additional reward for that as per the other ranks.

- The demands of the core role are significant. Fatigue is a factor and the restrictions on my personal life and on call periods are felt.
- Gold rota is covered by Chief Supt's and ACCs in XXX force. There should be fairness.
- I acknowledge the argument that part of general remuneration is for availability but not all rank holders undertake on-call so I think a payment is justified.
- Whilst on call arrangements in my own force are not overly onerous as we have an SFC on duty 24/7 I know the arrangements are much more personally impactive in some other forces.
- I am mixed between I should be compensated and cultural belief in that's the role / public service. On balance and with experience though I should be compensated somehow it is intrusive on me and family.
- Pay not kept pace and expectations of being on call are huge, I work far longer hours than colleagues who work in other sectors at a similar level with far less risk to manage and impact on family life.

Box 11. Comments by ACCs on parity

DCCs were likewise vocal in their responses, it should be noted that only 5 out of 22 respondents scored less than 4 when answering the question illustrated in fig. 27. Their comments included:

Strength of Feeling Regarding Parity – DCCs

- I believe it is fair, especially after Ch Supt gap has narrowed. Wouldn't score 7 as Supt's call does seem more onerous, but a lot less often.
- Cover requirements have grown and are prohibitive parity with other workplace arrangements reflecting similar recognition of the impact is essential.
- Having been as ACC for 6 years and having been on-call duty Gold/Firearms/Public Order, I recognise the absolute intrusion on personal life during that week every five weeks.
- On call is an additional requirement and should be remunerated.
- We are paid at a higher level than Federated and Superintendent ranks so accept the additional responsibility, but the current context for policing and demand on

the organisation and individuals, the pension and tax implications when considering the package holistically doesn't align with the private sector and other public sector roles with less responsibility and accountability.

- Increasingly there are demands to the role that are not remunerated unlike senior professionals within other public sector environments (health for example).
- I don't believe Chief Officers should attract the on-call allowance.
- It is not the intensity of other calls but represents being on call 1 week in 3.
- In principle there should be a payment....the money is an irrelevance however....but when something costs it is assigned a value and not taken for granted.
- I'm paid a good wage not sure if we need the extra, but I am conscious not everyone in the position financially or personally I am so don't want to rule them out.
- We should not attract this payment as chief officers.
- The salary between ACC and Ch Supt has narrowed with the additional £ 10,000 CH Supt payment. There should be a wider differential. Ideally This should be built into the salary of a Chief Officer

Box 12. Comments by DCCs on parity

As outlined above, the strength of feeling reduces the higher the rank of the respondent. Some of the more supportive comments from chief constables included:

- The demand is rising, and the impact has become more severe.
- Based simply on parity and fairness.
- I was not a supporter of on-call allowances being paid for Superintending ranks as I felt this responsibility, as with Chief Officers, is reflected within base pay.
 However, the fact that this group do now receive on-call allowances creates a disparity which ought to be addressed to negate future pay challenges/litigation.
- Can be argued it is recognised within salary levels, however the demands alter by force - smaller forces, COs are on-call more frequently, but the roles attract lower salaries.

- Where NPCC Officers are performing the same roles as Superintending ranks e.g. SFC, Force Gold, then they deserve equivalent remuneration.
- I don't think anyone realises the 24/7 nature of being on call all the time. I am not particularly after financial recompense, but I think it should be recognised the on-call commitment.

Box 13. Comments by CCs on parity

There were other comments that were not supportive of the payment of the allowance, many stating that it was part of the role.

Costings

The costs of broadening eligibility of the on-call allowance to ACCs will not be prohibitive but it is difficult to give an accurate illustration as the nature of on call differs between forces. For example, some forces share on-call for firearms and public order with superintending ranks whilst others retain it within the chief officer ranks, including ACCs and occasionally DCCs.

In smaller forces, it is likely that on-call will be undertaken by one chief officer. As a maximum, this would be at a cost of £7,300 for the force for the year. This cost will of course reduce if on-call is shared with superintending ranks who will already be budgeted for.

For larger or metropolitan forces, the cost would be for £7,300 per role per annum.

Recommendation

This section provides clear evidence to support the broadening of on-call allowance to include ACCs that perform operational on-call. The allowance itself is modest and broadening it to those identified in this paper can be achieved at relatively little cost.

The closing of the gap between chief superintendents and assistant chief constables has happened due to the cumulative effect of the introduction of pay point three, the use of TVP's and the inclusion of chief superintendents within the scope of on-call payments. Whilst this can be addressed within pay reform, there is no date for this work to start and be concluded. CPOSA believes the evidence warrants an immediate resolution, albeit on a temporary basis until that work is completed and implemented.

The payment recognises the significant impact being on-call has on work-life balance and broader impacts on health and wellbeing.

Recommendation 2: CPOSA asks the SSRB to make recommendations to the Home Secretary to broaden the current scope and enable the payment of an on-call allowance to those assistant chief constables who perform operational on-call. This payment will be for an interim period until pay reform work is concluded and implemented for that rank.

DCC Fixed Term Appointments

<u>Introduction</u>

SSRB members will recall from last year that the Home Office believe the matter of DCC Fixed Term Appointments (FTAs) should be considered by the PABEW. PABEW has agreed to progress this issue and terms of reference are being drawn up. In preparation for this work, we seek SSRBs observations on the removal of FTAs for DCCs to inform that debate.

CPOSA believes the removal of the fixed term appointment is the final element of the three matters that need to be modernised to enable mobility and increase the number of candidates for chief officer roles. The others, pay reform and rental accommodation, have been implemented. Recent changes in pensions legislation have meant officers now need to work longer and FTAs are having a significant impact on members choices. As such, we invite SSRB to comment on the evidence we present as it progresses to PABEW.

<u>Background</u>

Up until the 2004 pay reform, chief constables, deputy chief constables and assistant chief constables were all subject to FTAs, with the initial appointment comprising up to seven years. Following this, the FTAs were removed for ACCs and the initial FTA period for CCs and DCCs reduced to 5 years.

The Police Reform and Social Responsibility Act 2011 (PRSRA 2011) introduced the position that both police and crime commissioners and chief constables are separate corporation soles and employers. Therefore, the only position that is appointed by the chief constable and subject of an FTA is that of DCC.

The evidence base outlined below will undoubtedly have been compounded by the length of service now required to achieve a pension. CPOSA believes the introduction of the 2015 CARE pension will have an exponential impact upon candidate numbers due to the increased service required to draw a pension.

As we outlined and referenced within the workforce section, applications for DCC vacancies remain low. CPOSA believes the following evidence dictates a need for removal of DCC FTAs to compliment the agreed pay reform and relocation allowance variation.

The Evidence Base

There is clear and consistent evidence that illustrates the detrimental impact the DCC FTA is having on career choices.

In the 2024 survey, 72% of ACCs and commanders indicated they are intending to apply for or are interested in becoming a DCC, down from 80% last year but up from 37% seen in 2022.

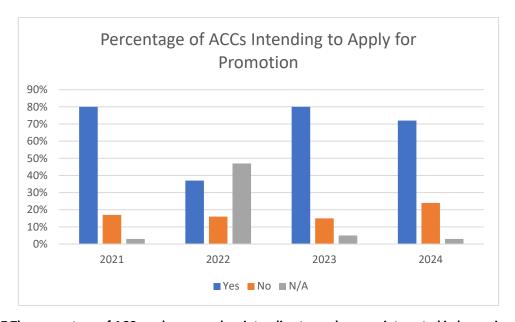


Fig. 27 The percentage of ACCs and commanders intending to apply or are interested in becoming a DCC

In the 2024 survey, 62% of ACCs and commanders indicated they are more likely to apply to become a DCC if they were employed on a permanent basis, broadly similar to last year. It is evident from our interactions with members that some feel it is too much of a risk by seeking promotion before the final five years required to achieve a pension.

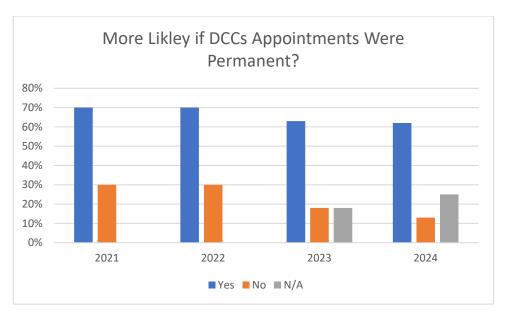


Fig. 28 ACCs/commanders more likely to apply for a DCC role if they were employed on a permanent basis.

The APCC has previously discussed removal of FTAs for DCCs and it too failed to reach consensus with the most significant issue being concern over the knock-on effect to applications for chief constables.

This year's survey once again showed the impact would be negligible.

When asked: 'If you were on a permanent contract as a DCC would you be less likely to apply for a chief constable's role due to the risks posed by a fixed term contract rather than permanent employment status', 74% of respondents said it would not make it less likely that they would apply.

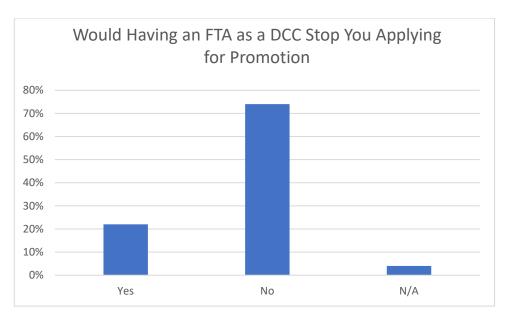


Fig. 29: 'If you were on a permanent contract as a DCC would you be less likely to apply for a chief constable role due to the risks posed by a fixed term contract rather than permanent employment status'

Legislative Position

Under Regulation 11 of Police Regulations 2003, an appointment to the rank of DCC shall be for an initial fixed term of up to five years. That appointment for a fixed term may be extended, by agreement of the chief constable and the person appointed, for a further term of a maximum of three years and for subsequent terms each of a maximum of one year.

The only safeguard for those officers' subject of an FTA is that the chief officer shall notify the person appointed, not less than three months before the end of the six-month period following the end date of the FTA, as to whether or not the appointment is to be extended.

This has the potential for a member to be removed from post without due process and is in stark contrast to the limited safeguards available where a chief constable seeks the removal of a DCC under Section 39 and Sch. 8 Part 3 of the Police and Social Responsibility Act 2011.

That requires:

The chief constable must give the senior police officer a written explanation of the reasons why the chief constable is proposing to call for the retirement or resignation.

- The chief constable must give the senior police officer the opportunity to make written representations about the proposal to call for the senior police officer's retirement or resignation.
- The chief constable must consider any written representations made by the senior police officer.

If the chief constable is still proposing to call upon the senior police officer to retire or resign under section 39 then they must:

• Consult the relevant police and crime commissioner.

The NPCC has not debated DCC FTAs recently. When they last did, those opposed were in the minority and some cited the ease of removal of a post holder by not renewing the FTA.

CPOSA is concerned that some members of the NPCC may wish to keep the FTAs for ease where they should be using the process outlined within Part 3 of Sch. 8 outlined above. The latter having safeguards, albeit limited, for members.

CPOSA's Position

CPOSA strongly believes the evidence presented consistently shows that having FTAs is impacting upon the candidate pools available to select DCCs. It is clear that by extending the pool, you will bring a more diverse and talented range of candidates. This is a stark contrast to the lack of evidence that shows effectiveness of using FTAs at the rank of DCC. We are of course acutely aware that the number of candidates is affected by more than just this one issue, and we describe how the removal of FTAs would be complemented by the adjustment to relocation allowances and pay reform recently implemented.

We therefore believe that FTAs should be withdrawn for DCCs.

Should that not be possible, we would seek to extend the current period back to its original length of 7 years but with built in protections that should reflect those within Part 3 of Sch.

8 of the Police Reform and Social Responsibility Act 2011. This would ensure that FTAs are not used as 'the easy option' but instead will have due process built in.

Observation 3: We ask SSRB to make observations on the evidence presented to them on fixed term appointments for deputy chief constables to inform the debate within the PABEW.

Summary of Recommendations and Requested Observations

Recommendation 1: This year's submission seeks a funded, 4.8% pay award for those officers CPOSA represents. We also believe that any pay award should be equally applied across all ranks.

Recommendation 2: CPOSA asks the SSRB to make recommendations to the Home Secretary to broaden the current scope and enable the payment of an on-call allowance to those assistant chief constables who perform operational on-call. This payment will be for an interim period until pay reform work is concluded and implemented for that rank.

Observation 1: SSRB is invited to make observations on the proposal by CPOSA that a replacement for PCC discretionary pay should be explored with any proposals made submitted to SSRB for the next pay round.

Observation 2: SSRB is invited to make observations on the proposal that CPOSA will suggest the work with PABEW is broadened to look at both a severance package where the officer has not achieved retirement age and also where the PCC has failed to comply with legislation when seeking the removal of a chief constable.

Observation 3: We ask SSRB to make observations on the evidence presented to them on fixed term appointments for deputy chief constables to inform the debate within the PABEW.

Appendix 1



Results of the CPOSA Members Survey 2024

239 responses | 65.1% | Spread of region, force bandings, role, tenure and age

Member Wellbeing

47% of respondents were classed as showing 'normal' levels of symptoms for anxiety (down from 73% in 2021 and 61% in 2018). Mild (29%), moderate (15%) and severe (8%) levels of anxiety are all higher than in both 2021 and 2018, using the HADS measure.

Levels of depression are also higher than in previous years. 74% are classed as showing 'normal' levels of depression (down from 82% in 2021 and 79% in 2018). Mild (20%), moderate (5%) and severe (1%) are all higher than they have previously been. To note, this is the first survey which has reported severe levels of symptoms for depression.

It is also noteworthy that 72% of members reported that HMICFRS inspections have had a negative impact on their wellbeing (42% slight negative, 30% negative)

The CPOSA 2024 levels are even higher now than they were during Covid-19, particularly the symptoms of anxiety among respondents. The improvement seen in the general population and improvement in wellbeing of NHS healthcare professionals is not being seen in CPOSA members.

The Working Environment

88% believe that diversity is recognised

80% believe that everyone is seen as part of the team up from 77% in 2018

58% agreed they had sufficient administrative support to do their job (up 3% from 2021)

95% agree they get a buzz from working in the chief officer team (up 2% from 2021)

87% of members have taken no sickness absence in the past 12 months

77% of members have not taken all of their annual leave in the past 12 months which is around average of the three surveys undertaken.

71% had not taken all of their rest. Days in the past 12 months.

93% of members carried out work or ensured they were easily contactable on leave.

44% said they are not often or seldom able to switch off from work.

Culture

Markers of a culture that is 'always on' have stayed stable or increased slightly from the CPOSA 2018 and CPOSA 2021 surveys.

50% of respondents agree that they work hard because they don't want to be seen as weak (up 15% from 2021)

49% agreed that the force expects them to be at work and/or answer the phone at unreasonable times (down 2% from 2021).

72% agree that they have a **tendency not to** say 'no' to anything (up by 4%).

Only 36% agree that they only receive work phone calls at all times of the day and night when they are on call (down 1% from 2021)

38% ensure they are rarely contacted when on annual leave (down from 42% in 2021) and only 23% ensure they are rarely contacted when on a rest day (down from 25%).



Demand, Working Hours and Work-Life Balance

3% reported working in excess of 70 hours a week.

25% are working in excess of 60 hours a week.

58% are working 50-60 hours a week

Only 54% agreed they are able to balance the demands of work with what they and want and need to in non-work time.

Only 12% of people agreed the demands placed in chief officers are commensurate with normally working less than 48 hours a week, down from 14% in 2021.

53% report their line managers work reasonable hours themselves, down from 62% in 2021.

82% reported that the excessive working breadth and depth of responsibility caused the excessive working hours, up from 77% in 2021.

Only 56% agree that their Chief Officer colleagues reinforce the importance of work-life balance through their behaviour.

Only 42% agree their chief officer colleagues work reasonable hours themselves.

Work demands remain at the very high levels seen in both 2021 and 2018. 99% say that **the role** places them under a high level of demand (compared to 97% in 2021 and 99% in 2018). One positive change is that people still felt that the meetings they attended were productive and had real purpose (68% compared to 69% in 2021 and 62% in 2018).

33% of respondents feel their **demands have risen by an excessive amount** (up from 28% in 2021), 50% feel they **have increased by a manageable amount** (down from 58% in 2021) and 17% feel they have stayed the same (up from 14%)

94% of respondents feel that the demands of their role **ensure they do need to take work home to complete outside of working hours** (up from 85% in 2021). One respondent noted that they often use annual leave days to catch up on paperwork at home.

Increased job demands was again the third highest area of concern this year (behind the impact of external influences, such as inspection regimes or political interference and the decrease in pension provision, the same areas as in 2021).

Investigations

18 respondents had been under investigation during the past 3 years. 78% reported the support provided by CPOSA was effective or very effective. Of the remining 4 people, 2 felt it was slightly effective and 2 not at all effective.

Wellbeing support provided by their home force was described by half of them as not at all effective or slightly effective.



Financial Concerns

75% respondents cited **pension scheme changes as a significant contributor to stress**, up 17% from 2021 and 23% from 2018.

83% cited tax liabilities as a significant contributor to stress (76% in 2021 and

73% in CPOSA 2018).

43% of members reported being more worried about their personal finances than

they were a year ago, an increase of 18% from 2021.

72% reported being **concerned that they will have to work for longer** due to changes in pension arrangements, an increase of 20% from 2021.

The decrease in pension provision was again noted in the top two areas of particular concern by respondents.

95% wanted CPOSA to develop further advice on police pensions (1% up from 2021) and 96% wanted advice on personal tax liability relating to police employment (same as 2021).

Specific financial advice was wanted around age brackets for pension abatement and how this is applied, and specific tipping points for tax and how this is recorded.

Working From Home

Whilst 90% of members reported some level of working from home, 24% of them said they did not feel equipped to manage others with hybrid working.

98% of members are spending less than 50% of their time working from home in 2024 than in 2021.

86% of workers think that it would be realistic to complete less than half of their work from home.

Suggesting ome people wish to complete more of their work from home that they currently do.

Flexible Working

A flexible working culture can help support diversity and health and wellbeing in the workplace.

5% of people asked for flexible working and the vast majority confirmed they received the exact variation they asked for.

The most common reason for not asking for flexible working as that people didn't want it (62% down from 78% in 2021)

16% of people said they wanted flexible working but did not ask because they thought it would affect their career prospects.

7% had not asked as they thought their request would be refused.

Only 5% thought their role could not be done flexibly.

Personal Development

71% agreed they receive helpful feedback on their performance (up 5% since 2021)

80% agreed they receive all the training they require (up 4% from 2021)

73% agreed they have a say in how their career develops (up 2% from 2021)



Additional Duties

65% are expected to take on additional command duties e.g CBRN, firearms and public order, down 2% from 2021.

69% are required to take on Gold Command Duties, down 3% in 2021.

Only 36% felt there is appropriate consideration of the workload impact of these additional responsibilities, down from 47% in 2021 with 11% indicating strong disagreement that workload impact is considered.

84% agreed or strongly agreed they are given appropriate support and responsibility of carry out Gold Command duties, down from 92% in 2021.

74% either agreed or strongly agreed they have appropriate levels of administrative support to achieve their goals when required to undertake Gold level command duties.

Behaviours

91% report their colleagues show supportive behaviours rather than bullying behaviours. 9% experience bullying behaviour by their chief officer colleagues, seemingly most felt in the ACC/Commander level.

92% of members with a non-PCC line manager report their managers show supportive behaviours rather than bullying behaviours. This means 8% of them do but this is down from 11% in 2021.

14% of members who are directly held to account by a PCC/mayor/policing body say the person they are accountable to shows bullying behaviour.

Inspections

90% of members not directly held to account by a PCC or equivalent agreed they felt supported by their organisation during inspections.

Only 44% agreed that PEEL inspections and gradings present an accurate picture of their organisation, just 3% strongly agreed that they did.

28% of members either disagreed of strongly disagreed when asked whether the PCC or similar abided by the 8 high level principles within the Accountability Guidance when holding the Chief Constable to account during HMICFRS inspections and upon subsequent publications.

PCCs/Mayors/Policing Bodies

As mentioned in the previous box, 28% of members either disagreed of strongly disagreed when asked whether the PCC or similar abided by the 8 high level principles within the Accountability Guidance when holding the Chief Constable to account during HMICFRS inspections and upon subsequent publications.

More generally, between 55% and 61% of members feel that the PCC or similar is effective or very effective in complying with each of the 8 principles.

Between 39% to 45% feel the PCC or equivalent is not effective, particularly around the principles of "sharing information openly and transparently' and Demonstrating behaviours of mutual respect, trust and confidence.