

**Submission to
the Police Remuneration Review Body
on behalf of the
Police Superintendents' Association
and the
Superintendents' Association of Northern
Ireland**

29th January 2021


Chair,
Police Remuneration Review Body

Dear Ms Bharucha,

I enclose our submission to the Police Remuneration Review Body for the 2021 pay round. This is a joint submission made on behalf of the Police Superintendents' Association and the Superintendents' Association of Northern Ireland.

I would be grateful if this submission could be read in conjunction with the joint submission made between the Police Superintendents' Association and the Police Federation of England and Wales, and the submission provided by the Police Federation of Northern Ireland, (who will submit in the future once they have received a remit letter).

Yours sincerely,



Dan Murphy
Chief Superintendent
National Secretary, Police Superintendents' Association

Contents

4	Introduction
5	List of PSA/SANI recommendations / comments required from the PRRB
6	Summary of the requirements of the Remit Letter 16 th December 2020
7	Evidence from the PSA/SANI on the December 2020 Remit Letter requirements
10	Evidence from the PSA/SANI on the PRRB's 'evidence and information requests' <ul style="list-style-type: none">- P.10 - Para 3.71 - Take up of 'TVP'- P.12 - Para 4.32 - Diversity- P.12 - Para 6.3 - COVID-19- P.15 - Para 6.5 - The UK's exit from the European Union- P.15 - Para 6.7 - The Uplift Programme
17	PSA & SANI Pay and Morale Survey – Summary of Findings
20	Superintending ranks benchmarking
22	Temporary Variable Payments
24	Working Time Regulation, Memorandum of Understanding for the Superintending Ranks
28	Pension update
31	Annual Allowance
33	PSNI (SANI) specific issues

1. Introduction

- 1.1 This is a joint submission to the Police Remuneration Review Body (PRRB) by the Police Superintendents' Association (PSA) and the Superintendents' Association of Northern Ireland (SANI).
- 1.2 The PSA represents approximately 1,300 superintendents and chief superintendents across 49 police forces. In addition to the 43 Home Office police forces, it also represents members in the British Transport Police (BTP), the Civil Nuclear Constabulary (CNC) and the crown dependency of the Isle of Man and British overseas territory of Bermuda. In 2020, the PSA also welcomed the Royal Gibraltar Police and the Royal Gibraltar Defence Police into the association. SANI represents 76 members in the Police Service of Northern Ireland.
- 1.3 The PSA was previously called the Police Superintendents' Association of England and Wales (PSAEW). The association shortened its name with effect from 22nd January 2018, to better reflect the scope of its membership and responsibilities mentioned above. All references to PSAEW within this submission or from previous pay rounds or correspondence can be assumed to also refer to the now PSA.
- 1.4 Collectively, our members are the senior operational leaders in policing and together with chief officers, account for the most senior 1% of police officers by rank within the service.
- 1.5 This submission should be read in conjunction with submissions made jointly by the PSA and the Police Federation of England and Wales (PFEW); and by the Police Federation of Northern Ireland (PFNI).
- 1.6 This submission builds on previous submissions, and evidence from previous years remains valid.
- 1.7 There is a specific section on SANI-related issues included at the request of the PRRB.

2. List of PSA/SANI Recommendations/Comments required from the PRRB

Recommendation 1: That the PRRB acknowledges that the PRRB timetable and the government's arbitrary approach to the PRRB arrangements do not instil confidence in the process or provide procedural justice.

Recommendation 2: That the PRRB acknowledges and highlights the timescales, capacity and cultural concerns raised by the senior operational leaders, who will be responsible for the implementation of the PPS across the service.

Recommendation 3: That the PRRB highlights to the Home Office and NPCC that the definition of performance and any measurement needs to be clearly defined and the lessons from the past and any unintended consequences should clearly influence the outcome.

Recommendation 4: That the PRRB recommends to the home secretary that the Home Office Police Uplift Programme ensures that the focus of the uplift is not just on achieving the figure of 20,000 officers, but that it ensures there is increased levels of supervision at all ranks to effectively lead and manage these extra officers.

Recommendation 5: That the PRRB recommends to the Home Secretary that the NPCC proposals to adjust the chief superintending rank's pay scale is agreed and introduced in September 2021.

Recommendation 6: That the government either a). seamlessly introduces the new regulation, or b) indefinitely extends the current arrangements.

Recommendation 7: That the Home Office and NPCC ensure that every force publishes a policy covering the use of TVPs.

Recommendation 8: That the Home Office and NPCC publish national guidance and review the use of TVPs on a 'force by force' basis annually and report their findings to the PRRB.

Recommendation 9: That the PRRB highlight to the Home Office the cumulative negative effect on police workforce morale and potential threat to the 20K uplift program, created by the government's policies in relation to the pay pause, proposed pension changes and annual allowance impact.

3. Summary of the Requirements of the Remit Letter 16th December 2020

3.1 The remit letter for England & Wales issued by the Home Secretary on 16th December 2020 was delayed awaiting the outcome of the spending review, which has meant that stakeholders have only had 28 working days to consult on its contents and prepare submissions. The main substance of the remit letter explains the decision and rationale for the government's 'pay pause' for public sector workers. Accepting that the pandemic has significantly impacted on the economy, labour market and fiscal position, the PSA still believes it is important that the government follows its own process and regulations to ensure that there is procedural justice. The position taken this year by the government to nullify the process has previously been experienced by the public sector workforce, when the government announced a pay freeze for several years as a result of the financial crisis, and it should be noted that the government appears to treat the PRRB process as a 'fair weather' mechanism.

3.2 In addition to documenting the rationale for the 'pay pause' the government, through the remit letter, has requested the PRRB make recommendations specifically in the context of the government's commitment to rebalance police officer numbers. The specific recommendations that the PRRB was requested by the Home Secretary to comment on are as follows:

- *For those earning the full time equivalent of gross earnings of less than £24,000, the Government proposes to continue pay uplifts at a value of £250 or the National Living Wage increase, whichever is higher. PSA looks to the PRRB to provide recommendations on the implementation of this uplift and the number of officers it will apply to, taking into account the guidance provided in Annex A of this letter.*
- *To consider and make recommendations on the National Police Chiefs' Council's (NPCC) proposals to introduce a 'pay progression standard' and the timetable for implementation.*
- *In your last report, you provided thoughtful observations on the proposals submitted by the NPCC on benchmarking of police officer pay and valuation of the 'P factor'. The PSA expects the NPCC to update PRRB on the work undertaken to reach consensus with all parties on the methodologies used to benchmark the pay of all ranks and to value the 'P factor' and the PSA would be grateful for your updated commentary on this important work.*

Recommendation 1: That the PRRB acknowledge that the PRRB timetable and the government's arbitrary approach to the PRRB arrangements do not instil confidence in the process or provide procedural justice.

4. Evidence from the PSA/SANI on the December 2020 Remit Letter requirements

4.1 In relation to the following requests:

- For those earning the full time equivalent of gross earnings of less than £24,000, the Government proposes to continue pay uplifts at a value of £250 or the National Living Wage increase, whichever is higher. The PSA looks to the PRRB to provide recommendations on the implementation of this uplift and the number of officers it will apply to, taking into account the guidance provided in Annex A of this letter.
- To consider and make recommendations on the National Police Chiefs' Council's (NPCC) proposals to introduce a 'pay progression standard' and the timetable for implementation.
- In your last report, you provided thoughtful observations on the proposals submitted by the NPCC on benchmarking of police officer pay and valuation of the 'P factor'. The PSA expects the NPCC to update PRRB on the work undertaken to reach consensus with all parties on the methodologies used to benchmark the pay of all ranks and to value the 'P-factor' and the PSA would be grateful for your updated commentary on this important work.
- The PSA/SANI response to the issues above are documented in the joint PSA and Police Federation of England and Wales submission to the PRRB. However, the PSA has recently obtained the following information, which we believe will be of use to the PRRB.

4.2 In the January 2021 Pay Survey, PSA members were asked for their views as senior operational leaders on the NPCC's proposal to introduce the 'Pay Progression Standard' (PPS). From the 1300 superintendents and chief superintendents that make up the membership, 923 officers responded (67% of all the membership), and their responses can be summarised as follows:

4.3 Respondents were asked a series of new questions in this year's Pay Survey to gather their views about the practicality and appropriateness of new pay reform proposals set out by the National Police Chiefs' Council. Respondents were provided with an outline of the NPCC's proposals, then asked a series of follow up questions about whether respondents felt this was deliverable within their force.

4.4 For ease, the outline of the NPCC's proposals that was given to respondents is provided below:

The NPCC is proposing that no officer will progress up their relevant rank pay scale unless statutory and mandatory training has been completed. The NPCC has proposed that this should include Officer Safety Training and First Aid training, plus up to two local priority training areas (such as prioritised in a Police and Crime Plan, Force Management Statement, or HMICFRS recommendation).

- 4.5 In relation to this proposal, respondents were asked about whether forces ensured all officers completed officer safety training (OST) and first aid training, given that officers' pay would be contingent on completion of this training. 72% of respondents said that their force currently ensured that all officers received OST and first aid training, 22% said that their force currently does not ensure that all officers received OST and first aid training and 7% did not know.
- 4.6 In addition, 26% of respondents said that their force delivered other mandatory training to all officers whilst 30% said that no other mandatory training was delivered to all officers. The most common response to this question, given by 44% of respondents was that they did not know if other training was delivered.
- 4.7 A range of examples of different training was provided by respondents in relation to this question. These included vulnerability training, diversity and equality training (including unconscious bias training), health and safety training, GDPR and data protection training; often delivered as online/NCALT packages.

The NPCC is proposing that where an officer manages others, no officer will progress up their relevant rank pay scale unless they have completed PDRs and made PPS decisions on behalf of those they manage.

- 4.8 In relation to this proposal, respondents were asked about whether they felt they would have sufficient time and capacity to ensure this was implemented effectively within their department/command. There was a relatively even split between those respondents who felt that they would have sufficient time and capacity to ensure that this was implemented effectively (46%) and those who felt they would not have the time and capacity (43%). 11% of respondents said that they did not know.
- 4.9 In addition, 45% of respondents said that they would not be at all content for their own pay progression to be dependent on completing PDRs and PPS decisions on behalf of those they managed, 41% said that they were mostly content whilst 14% said that they were completely content.

The NPCC is proposing that no officer will progress up their relevant rank pay scale unless a Professional Development Review (PDR or appraisal) has been completed in accordance with the agreed force process. This should confirm that an acceptable level of performance has been achieved, because no formal capability process is in place.

- 4.10 Again, respondents were broadly split between those who felt that they would have sufficient time and capacity to ensure this was implemented effectively within their department/command (42%) and those who felt they would not have sufficient time and capacity (39%). 18% of respondents said that they did not know whether or not they would have the time and capacity.

- 4.11 40% of respondents felt that their force would be ready from a practical perspective to implement this proposal by March 2022, however a very similar proportion (41%) felt that their force would not be practically ready to implement this; 19% of respondents were unsure.
- 4.12 More notably, 59% of respondents felt that their force would not be ready from a cultural perspective to implement this by March 2022, in contrast to just 28% who felt their force would be culturally ready; 14% said that they were unsure.
- 4.13 Respondents were also asked whether they felt this proposal would result in improved performance in their force. Two thirds of respondents did not believe that preventing officers from moving up their relevant pay scale unless a PDR has been completed would improve performance within their force; 13% felt that it would improve performance and 20% said that they did not know.
- 4.14 Even amongst respondents who felt that their force would be ready from a practical perspective to implement this by 2022, 60% of respondents did not feel that this proposal would improve performance in their force. 50% of those who felt their force would be ready from a cultural perspective did not think it would improve performance.
- 4.15 In relation to the PSA respondents more than one in three (38%) said that they had not had a PDR in the last 12 months and just under half were dissatisfied with the PDR process. Despite this, 90% of respondents who had received a PDR in the last year said that they felt the rating they received in their PDR was a fair and adequate reflection of their performance.
- 4.16 It should be noted that the date for implementation of the PPS coincides with the government's proposed remedy to the pensions challenge and the proposed revised transfer of all serving officers onto the 2015 CARE pension scheme. These proposed changes are not welcome by the police workforce and will be administered by the same force support functions that would be responsible for the implementation of the PPS.

Recommendation 2: That the PRRB acknowledge and highlight the timescales, capacity and cultural concerns raised by the senior operational leaders, who will be responsible for the implementation of the PPS across the service.

Recommendation 3: That the PRRB highlight to the Home Office and NPCC that the definition of performance and any measurement needs to be clearly defined and the lessons from the past and any unintended consequences should clearly influence the outcome.

5. Evidence from the PSA/SANI on the PRRB's 'Evidence and Information Requests'

5.1 This year along with the PRRB remit letter, the government published a document entitled – 'Police Remuneration Review Body 2020 Report: Evidence and Information Requests'. After analysis of this report, to assist the PRRB the PSA will be in a position to comment on the following requests:

- **Para 3.71 – Take-up of TVP:** We agree that the payment should continue to be funded and applied locally by those who best understand local circumstances and priorities. For next year's review we would welcome data on the take-up of TVP.
- **Para 4.32 – Diversity:** The proportion of ethnic minority chief officers appears to have been on a downward trend since 2010 and diverging from the overall proportion of ethnic minority officers. We will monitor these trends with interest.
- **Para 6.3 – COVID-19:** Next year's evidence will need to cover the impact of COVID-19 and we would hope to see discussion of how this has affected policing and the policing environment, as well as the police workforce and the wider economy and labour market. We would also expect to see evidence on how the extensive repercussions of COVID-19 have affected police officer recruitment, retention, morale and motivation. In addition, we would welcome an assessment of the longer-term implications of COVID-19 for policing.
- **Para 6.5 – The UK's exit from the European Union:** One area under discussion relates to law enforcement and judicial cooperation in criminal matters. For next year's round we will be interested to receive evidence on the implications of the UK's exit from the EU for policing.
- **Para 6.7 – The Uplift Programme:** We also look forward to receiving an update on the progress towards meeting the increase in the police officer numbers in the Uplift Programme.

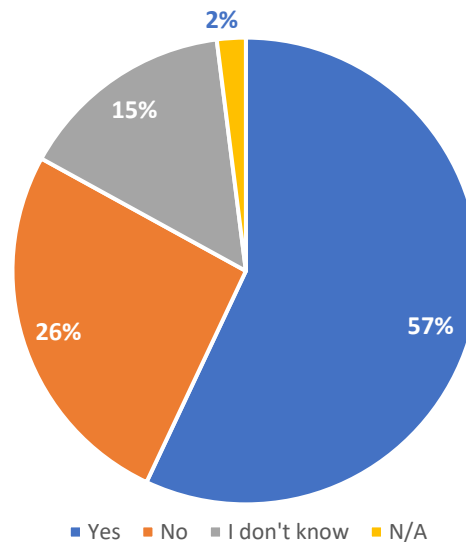
5.2 Para 3.71 – Take-up of TVP

Please also see section 8 below.

The most up to date information from the PSA comes from the recent Pay Survey completed in January 2021. The detail on take-up of Temporary Variable Payments (TVPs) is as follows:

From the 923 responses to the 2021 Pay Survey, 57% of respondents (n=485) said that they were eligible to apply for a bonus payment between 2017 and 2020. Of those who said that they were eligible to apply for a bonus payment, only 35% (n=172) actually applied. The proportion of eligible respondents who had applied for a bonus payment has not increased substantially since 2019, when 33% of respondents said that they had applied.

Did you fulfil the criteria to be eligible to apply for a bonus payment between 2017 and 2020?



- 5.3 Of the 35% of respondents who were eligible and who had applied for a bonus payment, 47% (n=80) said that their application had been successful, 49% said that it had not been successful and 4% said that they did not know (for example because the application was still being considered). In comparison, last year 56% said that their application had not been successful. Overall, approximately 9% of the respondents to the PSA survey received a bonus payment this year.
- 5.4 The average amount per annum of the bonus payment was £2,743. Respondents most commonly received £4,000 per annum (45% of respondents who received a bonus payment), whilst 15% of respondents received £2,000 per annum. 73% of respondents who received a bonus payment had their payment backdated.
- 5.5 Amongst respondents who said that they received a bonus payment up to September 2020, 72% said that since September 2020 they had continued to receive a bonus payment without having to reapply, 3% said that they had continued to receive a bonus payment but had to reapply, 9% said that their bonus payment has stopped, 9% said that they did not know what had happened to their bonus payment after September 2020, and 8% said something else had happened (most commonly that they were still waiting to hear).
- 5.6 Of the 65% of respondents who said that they were eligible to apply for a bonus payment but who had not applied, the most common reason for not applying was that respondents were put off applying because they were aware the scheme was not supported by chief officers in their force (58% said this was the main reason for not applying). In contrast the next most common reason, was given by only 10% of respondents, who said that they had not applied because they do not agree with bonus payments as a method of payment for the superintendent ranks.

5.7 Para 4.32 – Diversity

The Police response following the unlawful killing of George Floyd and the rise of the Black Lives Matter movement and associated protests were the catalysts for a response by the Service to the challenges of the recruitment, progression and retention of officers from a Black, Asian and minority ethnic background. The Police Superintendents' Association has played a significant role in supporting the service and driving positive change.

- 5.8 The PSA is currently supporting the NPCC / College of Policing Inclusion and Race Action Plan, but has approached the wider issue of diversity, equality and inclusion from a broader basis of valuing all difference. The PSA has been pivotal in the development of a Coaching and Mentoring Programme to support under-represented groups in terms of retention and progression. After 4 years of working in collaboration with the College of Policing, over 1000 leaders have been trained to support under-represented group members. The Home Office analysis of the programme showed significant positivity for both the coach and the beneficiary during this independent analysis in 2018 and 2019. Such has been the success, the College has taken over the whole programme to incorporate it within the leadership and diversity offer of services.
- 5.9 The PSA is now developing another coaching programme in conjunction with the British Army to develop cross-organisational support for under-represented group members from both organisations. Whilst it is only in its second year, the early feedback is very promising with the British Army quadrupling its involvement in year 2. The area that would address some of the significant challenges facing policing on workforce representation is the drive for positive action.
- 5.10 This is an area that the PSA feels has not been fully exploited and the benefits remain to be realised in recruitment, progression and retention of officers and staff.

5.11 Para 6.3 – COVID-19

The police have faced an enormous challenge in policing the response to the pandemic, something which has impacted on every external and internal issue facing the Service. The national response has been excellent, responding to the unprecedented scale and pace of the emergency. From fast moving legislation changes, distribution of PPE, changing working practices to maintaining services, the Police have responded admirably and continued to maintain a positive relationship with the vast majority of the population.

- 5.12 The additional positive impacts for the workforce have been the expansion of digital and technology driven processes at a pace which would have taken years to embed. The Police has also adopted agility and flexibility in working practices which, if it can be maintained when normality returns, the employment offer could be very attractive to individuals who may otherwise have not considered a job in policing.
- 5.13 However, the pressure of policing the pandemic, the impact on rest days and annual leave, the absence of a truly rehabilitative rest from the challenges of the role, the increased use of overtime and the daily pressures of maintaining a public contact role with the appropriate

safeguards and the risks to their own families, has taken a toll. There is growing concern of individual and organisational fatigue and we expect to be seeing this show during 2021, a year when, additionally, a number of large-scale events requiring police services have been re-arranged to take place, resulting in an increased demand for mutual aid.

5.14 The following is useful evidence from the PSA 2021 Pay Survey:

A large majority of respondents felt that their force has managed officers well during the COVID-19 crisis, with only 3% of respondents saying that they did not feel that their force had managed officers well during the crisis. However, COVID-19 has had a notable effect on respondents' morale and workloads. 55% of respondents said that COVID-19 had had negative impact on their morale. In addition, more than half have had to take on additional duties or shifts and had changes made to their usual duties or shifts. 6% of respondents said that they currently had a COVID lead role.

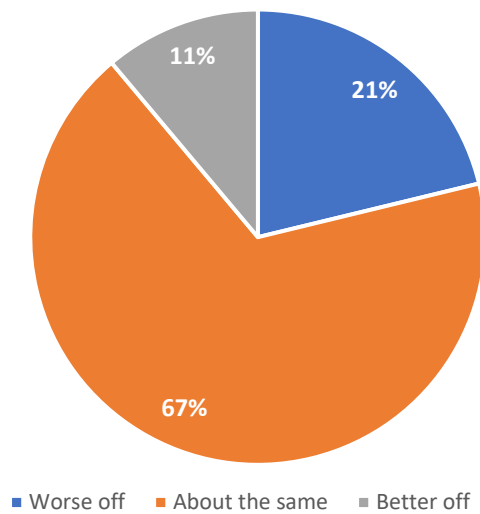
5.15 Just under a third said that they had been unable to book annual leave because of the pressures of work due to COVID-19, whilst one in five said that they had had rest days cancelled due to COVID-19. In total 31% of respondents have had to self-isolate at home at some point during the pandemic.

5.16 The proportion of superintending ranks who said that they have had changes made to their usual duties or shifts was very similar to the proportion of federated ranks who reported changes to their duties or shifts within this year's PFEW Pay and Morale Survey (53%). However, Superintending ranks were more likely than the federated ranks to say that they had taken on additional duties or shifts. Amongst federated ranks 29% of respondents had taken on additional duties, compared to 55% of Superintending ranks.

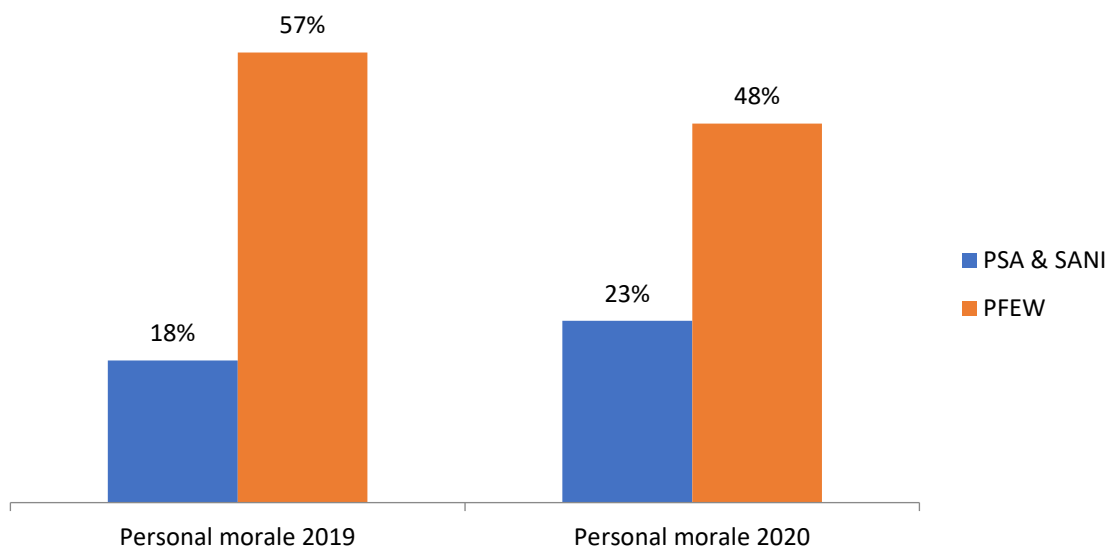
<i>As a result of the COVID-19 crisis...</i>	
I have had to take on additional duties or shifts	55%
I have had changes made to my usual duties or shifts	51%
I have been unable to book annual leave because of the pressures of work	30%
I have had my rest days cancelled	20%
I have had my annual leave cancelled	12%
I have had my request for annual leave rejected	5%

5.17 We also asked respondents about the impact of COVID-19 on their household finances. Around one in five respondents said that their household was now financially worse off than before the pandemic.

Compared to before the COVID-19 crisis, is your household financially worse off...?



Proportion of respondents reporting low morale in 2019 PSA & SANI and PFEW surveys



5.18 Para 6.5 – The UK’s exit from the European Union

The implications for policing are primarily in two key areas. The operational impact of the police supporting the border ports for air and sea transport and any adverse implication for the local communities and transportation networks. Whilst local resilience forums have planned for this eventuality, there is the growing pressure for mutual aid for forces coping with this type of challenge.

5.19 The second key impact will be the less efficient information exchange with European countries. The President of the PSA has spoken publicly about the risks in having a slower, less efficient and more cumbersome approach and this will cut across every police force, with the use of European data, in dynamic situations to assist officers in dealing with and risk assessing individuals. High profile senior stakeholders from the Police, MI5 and CT have expressed their concerns about the new arrangements. The Police will continue to monitor this very closely.

5.20 Para 6.7 – The Uplift Programme

The Police are ahead of the aspirational recruiting levels and ‘on target’ to reach an additional 20,000 new police officers by March 2023. This has been a huge recruitment campaign, to attract over 50,000 in a three-year window. This is at a time when unemployment is rising and the marketplace and attractiveness to join the police has remained extremely high.

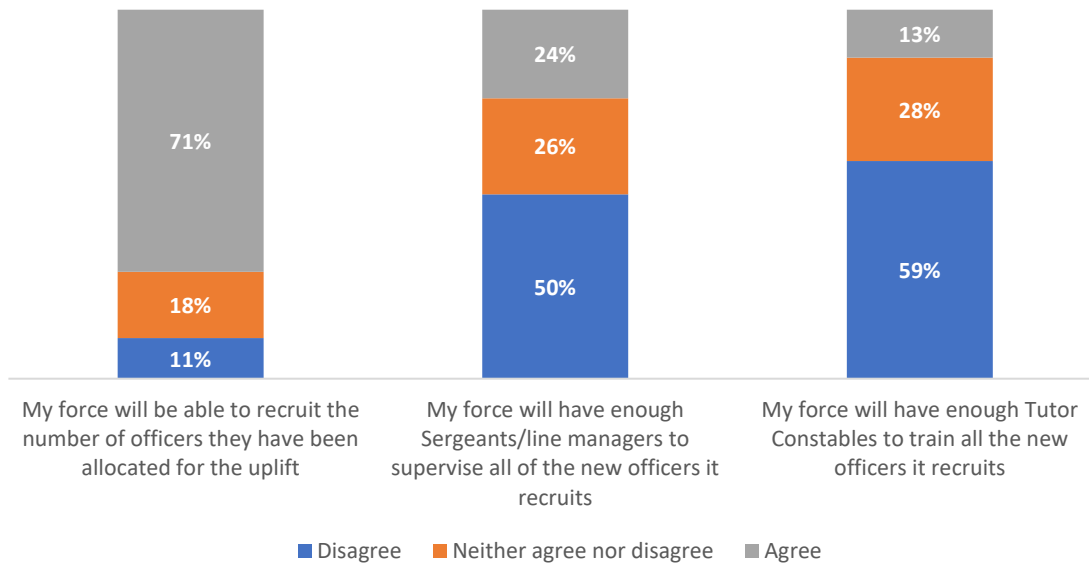
5.21 There has always been a concern about the sustainability of funding from the government for this programme and the Police were concerned by the decision to only recruit 6000 in year 2 rather than 8000. However, the Police have been reassured by the government’s overall commitment to raise the number of police officers by 20,000, but this latest decision does leave pressure on Year 3, when the labour market and economy is likely to have improved.

5.22 There are a few concerning issues emerging from this huge resource investment. The Police are seeing a younger age profile of front-line officers and consequently the experience levels are reducing. Senior officers are concerned that this will create a more inexperienced workforce and create more challenges regarding welfare support, learning, and human resource issues, that have not been seen before. No government institution or agency would approach recruiting in the long term with this approach of ‘famine and feast’ as it creates unnecessary organisational challenges, however restoring the levels to those similar to 2010 is very welcomed.

5.23 The following is useful evidence from the PSA 2021 Pay Survey:

This year’s survey also asked respondents for their views on the 20,000 officer uplift. Whilst the majority of respondents were confident that their force would be able to recruit the number of officers allocated for the uplift, 50% felt that their force would not have enough sergeants/line managers and 59% felt that there would not be enough tutors to supervise or train all of its new recruits. Members of the superintending ranks were indeed more likely than members of the federated ranks to feel that their force would not have enough line managers to supervise all of the new recruits, with 45% of federated rank members expressing this view.

20,000 officer uplift



5.24 38% of respondents said that the increase in officer numbers had a positive impact upon their morale, 9% said that it had a negative impact upon their morale, however the majority of respondents (53%) said that the officer uplift had no impact upon their morale. PSA and SANI survey respondents were however slightly more likely to say that the uplift had a positive impact upon their morale than PFEW members, where only 25% said that the uplift had a positive impact upon their morale.

Recommendation 4: That the PRRB recommend to the Home Secretary that the Home Office Police Uplift Programme ensures that the focus of the uplift is not just on achieving the figure of 20,000 officers, but they ensure there is increased levels of supervision at all ranks to effectively lead and manage these extra officers.

6. PSA & SANI Pay and Morale Survey – Summary of Findings

6.1 As a result of the timings of the remit letter (16/12/20), the closing of the PSA Pay Survey (4/1/21) and the call for evidence (29/1/21), there has been minimal time to research, verify, respond and prepare for this year's PRRB submission. The PSA has therefore focused on those issues of interest to the PRRB, linked to the remit letter and those that are critical to the PSA membership, which have been prioritised and included in this submission. Therefore, at this time, it is not possible to provide a full approved and verified summary of the PSA Pay Survey results. However, the full report will be available later in the PRRB cycle.

6.2 To assist the PRRB an executive summary of the additional findings can be found below:

6.3 Sample and respondents

- 923 respondents took part in the 2020 Pay Survey between November and December 2019; a response rate of approximately 67% of PSA and SANI members; this is identical to last year's response rate.
- The sample of respondents was broadly representative and was large enough that the percentages quoted in this report can be considered accurate within the normal bounds of academic rigour.
- Around a third of respondents had been a superintendent for a year or less, and therefore were likely to be completing the survey for the first time in 2020. As a result, whilst the survey can be used to demonstrate year-on-year trends in the views of the superintending ranks as a whole, it does not reflect the views of exactly the same group of individuals each year. This should be borne in mind when drawing comparisons between the responses in this year's survey and previous years' surveys.
- This year's Pay Survey was also conducted in circumstances widely removed from the context of previous surveys. Therefore, whilst the findings from previous years' surveys are discussed throughout, the reader is advised against making assumptions about year-on-year trends based on this year's data alone.

6.4 Pay and remuneration

- Less than half of respondents said that they were satisfied with their overall remuneration, although 57% said that they were satisfied with their basic pay, compared to 26% who were dissatisfied.
- Superintendents who had been at the top of their pay scale for more than year were most likely to report dissatisfaction with their basic pay, with more than one in three respondents in this group saying that they were dissatisfied.
- 62% of respondents in receipt of London and South East Allowance and London Weighting saying that they were dissatisfied with the amount of the allowance they received.
- 71% of respondents said that they did not feel that their pay was fair compared to employees doing similar work in other organisations and almost three quarters said that they did not feel fairly paid considering the stresses and strains of their job.

- More than a third of respondents said that they now felt less fairly paid than a year ago; amongst respondents who had taken on additional responsibilities in the last year, 51% said they felt less fairly paid compared to 12 months ago.
- A majority of respondents said that they had not received pay increases that allowed them to maintain their standard of living and around a quarter of respondents said that they now felt financially worse off than they did five years ago.
- Just over a third of respondents (34%) said that their force provided them with a free health screening; amongst respondents who said that their force provided them with a health screening, 44% said that they had been provided with a health screening in the last 12 months.

6.5 Morale and motivation

- A higher proportion of respondents reported low morale in this year's survey compared to last year, and 41% of respondents said that their morale was lower now than it had been 12 months ago.
- Issues related to pensions, either in terms of taxation policies or the pensions remedy, remain the factors most likely to have a negative impact upon morale amongst members of the superintending ranks. However, this year, a higher proportion of respondents than ever before said that their workload and responsibilities had a negative impact upon their morale.
- Respondents were much more likely to say that their personal motivation was high (64%) than to say that their motivation was low (15%); however just over a quarter of respondents said that their motivation was lower now than it had been 12 months ago.
- More than nine out of ten respondents said that they felt proud to be in the police, with a majority also saying that that they would recommend joining the police to others. 54% of respondents said that they felt valued in the police, however 32% of respondents said that they now felt less valued for the work they did than last year.
- This year a smaller proportion of respondents felt that members of the police were respected by society at large than any other year that they Pay Survey has been conducted.
- A quarter of respondents said that they were now more inclined to leave the police service than they had been 12 months ago.
- Eight out of ten respondents said that they were satisfied with their treatment by their line manager and that their line manager took account of their views and opinions. However, a quarter of respondents felt that Chief Officers in their force did not take account of their views and opinions.

6.6 Promotion and development

- 41% of respondents said that they intended to apply for further promotion, with just under a quarter saying that they intended to apply for chief officer rank. 29% of respondents reported being less likely to apply for promotion now compared to last year.
- The reason respondents most commonly gave for not applying for promotion was that they had only recently been promoted. Amongst respondents who had not been recently

promoted, 38% of respondents said that they had not applied for promotion because of the impact on their work-life balance, whilst 36% said that they had not applied because of changes to Annual and Lifetime Allowances.

- Less than half of respondents this year reported being satisfied with their opportunities for training and Continuous Professional Development (CPD), just under one in four respondents felt that they did not receive support when they wanted to learn new skills.

6.7 Role and responsibilities

- 28% of respondents said that additional responsibilities had been devolved to them from a person of more senior rank/grade in the last year.
- Just over half of respondents said that they undertook a Silver/tactical command function, whilst just over a third said that they undertook a Gold/strategic command function. In addition, two thirds of respondents undertook PACE authorising functions and 46% said that they undertook a RIPA authorising officer function.
- Around one in five respondents who undertook a Silver/Gold command function or who took a RIPA authorising officer function, and just under a third of respondents who performed a PACE authorising function said that they were not trained or accredited to perform these functions.
- Only 24% of respondents believed that no member of the superintending ranks in their force performed a Gold Command function, whilst just 8% believed that no member of the superintending ranks performed a firearms command function in their force.
- 92% of respondents said that they performed an on-call function outside their normal hours of duty (compared to 89% of respondents in 2019), with 65% of these respondents on call for more than one area of responsibility. 89% of respondents who said that they were receiving on-call allowance for the on-call duties they undertook.
- 18% of respondents who performed an on-call function said that they were on-call on annual leave, whilst 68% said that they were on-call on rest days. 37% of those who said that they perform on-call on rest days reported that they do not receive day(s) of in lieu.
- 86% of respondents said that they needed to travel by car for their role, on average driving 6 hours per week as part of their duty. 64% of respondents who said that they travelled by car for their role said that they received Essential User's Allowance (up from 58% of respondents in 2019). In contrast, the proportion of respondents provided with a police vehicle has decreased over the last three years.
- 90% of respondents said that they made business calls whilst driving to and from work on their commute. On average respondents reported spending a slightly higher proportion of their time driving to and from work on their commute making business calls this year (35% of commuting time spent making business calls) than last year (32% of commuting time spent making business calls).

7. Superintending Ranks Benchmarking

7.1 In 2018/19 the PSA commissioned Korn Ferry to review the superintending ranks pay scales and the results were shared with the NPCC and the members of the Police Consultative Forum (PCF), who unanimously agreed to the methodology and accepted the outcome of the benchmarking study. Without repeating evidence that the PSA has presented in previous PRRB rounds, the results clearly showed that the chief superintendent rank:

- Had shrunk by 34% since 2010 (the largest drop in any rank 473 to 312 officers)
- The differential between the pay points was out of sync with the overall police ranks pay spines
- That the gap between the top of scale chief superintendent and the first ACC pay point was disproportionate
- That the job size had significantly changed, and the rank was underpaid

7.2 Since the acceptance of the superintending ranks benchmarking results the PSA has lobbied the NPCC pay lead to remedy the situation. However, without notice during last year's PRRB round the government announced the 'Police Uplift Programme', which led to an urgent need to adjust constable and sergeant pay. So, recognising the resourcing issues in the NRT, the PSA approached the NPCC pay lead and put forward a proposal that the superintending ranks benchmarking remedy could be delayed until the following year and run in-conjunction with the planned review of chief officer pay. This proposal was accepted by the NPCC pay lead and throughout 2020, alongside the chief officer review of pay, the NRT has conducted a review of the superintending ranks pay.

7.3 The outcome of this review, which has been ratified by the Police Consultative Forum and Chief Constables' Council on the 22nd January 2021 and will feature in the NPCC submission to this year's PRRB round, is that the third and top pay point for the chief superintending rank will be increased by £5675 to £97,424.

7.4 The NRT has also estimated the costs to individual forces of immediately making this adjustment to the pay of the chief superintending ranks, which is set out below:

Total Base Pay – additional costs for forces

Cost to Force	Number of Forces
Less than £20k	30
Between £20 - £50k	11
Between £50 - £100k	1
Over £100k	1
Total no of forces	43

- 7.5 The NRT has estimated that the year-on-year cost to make the change to remedy the chief superintending ranks pay scales is £805,850. The remit letter states, “No member of the police workforce will face a cut to their existing reward package and the pause will apply to headline pay uplifts only – other payments, such as progression pay, overtime and special allowances will continue as before”. Therefore, the PSA believes that the proposed adjustment to progression pay is outside of the scope of the ‘pay pause’ and when spread across the 43 forces is affordable.
- 7.6 The PSA is fully supportive of this proposal and would request that as the review of the superintending ranks pay has been in train since 2018 and because the cost to each force is assessed as affordable, that the PRRB recommends to the home secretary, as part of the response to the PRRB remit letter, that this adjustment to the chief superintending ranks pay scale is introduced in September 2021.

Recommendation 5: That the PRRB recommends to the Home Secretary that the NPCC proposals to adjust the chief superintending rank’s pay scale is agreed and introduced in September 2021.

8. Temporary Variable Payments

- 8.1 Paragraphs 5.2-5.6 above set out the latest PSA data from the 2020 pay survey in relation to the views of our membership on the introduction and use of Temporary Variable Payments (TVPs).
- 8.2 The PSA is generally supportive of the introduction and use of TVPs. The PSA's main consistent concern with regards to the design and use of TVPs is the inclusion in the process of the ability for chief officers to use their discretion, which has resulted in nationwide inconsistency regarding which forces are using TVPs. This is a wide-ranging discretion that covers:
- Whether the force will have a policy to use the regulation or not (many forces just do not use TVPs because the Chief Constable use their discretion to refuse to have a policy)
 - Whether an officer meets the criteria or not
 - If a payment is to be made, the level of that payment
- 8.3 The PSA is however starting to see an increase in the number of chief constables who are willing to use the TVPs and a greater engagement with local PSA branch officials to ensure that policies are introduced. If each force had a policy that followed clear national guidance and if there was a robust central monitoring of the use of TVPs then the concerns of the PSA are likely to be addressed. We are encouraged to hear this month, of the Home Office intention to undertake an equality impact assessment on the use of TVPs.
- 8.4 The PSA has been informally engaged over the latest proposals for the continuation of the TVPs. We are aware that the current temporary regulation that allows the payment of TVPs was extended by the home secretary from September 2020 to April 2021, and that the NPCC has proposed to the Home Office a revised permanent TVP regulation that they would want introduced seamlessly in April 2021. Also, this month, we are encouraged to hear that the consultation process on the planned introduction of the new TVP arrangements has begun. We will raise our concerns as part of this process but will be positive in our response.
- 8.5 The PSA supports the introduction of a new permanent TVP regulation. If the current temporary regulation ceases with no replacement in April 2021, those in both the superintendent and chief superintendent rank who have been deemed to have the most demanding jobs will see a reduction in their remuneration package. This will undoubtedly be seen as a failure in leadership by the Home Office and NPCC and would be completely unacceptable to the PSA, especially with the backdrop of a 'pay pause'. Again, quoting from this year's remit letter which states: "No member of the police workforce will face a cut to their existing reward package and the pause will apply to headline pay uplifts only – other payments, such as progression pay, overtime and special allowances will continue as before".
- 8.6 The PSA therefore requests that the PRRB makes the following recommendations to the home secretary:

Recommendation 6: That the government either a). seamlessly introduces the new regulation, or b) indefinitely extends the current arrangements.

Recommendation 7: That the Home Office and NPCC ensure that every force publishes a policy covering the use of TVPs.

Recommendation 8: That the Home Office and NPCC publish national guidance and review the use of TVPs on a 'force by force' basis annually and report their findings to the PRRB.

9. Working Time Regulation, Memorandum of Understanding for the Superintending Ranks

- 9.1 In previous PSA submissions to the PRRB, the PSA has raised concerns in relation to the reduction in numbers in both the superintendent and chief superintendent ranks (the largest percentage drop in any rank), and the subsequent excessive hours that members currently work to manage the demand, which has only grown in recent years. The PRRB has discussed these concerns with the national secretary at the verbal evidence sessions and always noted our concerns.
- 9.2 It is encouraging to inform the PRRB that the NPCC has worked with the PSA throughout 2020, to formulate the following Memorandum of Understanding and annex with examples. All contributors to this debate have reached a shared position, which is reflected in the MOU. The document now requires sign off by the NPCC lead, who has given an undertaking to come to an agreement before the PSA gives verbal evidence. We look forward to providing the PRRB with an update at the verbal evidence stage.

MEMORANDUM OF UNDERSTANDING **(DRAFT) WORKING HOURS FOR SUPERINTENDING RANKS**

In September 2019, the Secretary of State gave a commitment to changing the law to introduce defined working hours for superintending ranks, opening the door for flexible working.

The Secretary of State has made amendments to determinations, Annex E – Duty; Annex F – Pay and Annex H – Public Holidays and Rest Days. The combined amendments to Annexes E, F and H provide flexible working opportunities for superintending ranks.

A copy of Annexes E, F and H is attached to this memorandum.

Chief Constables recognise their responsibilities in relation to the Working Time Regulations 1998 (“WTR”) and more broadly staff wellbeing.

To support this and wider management of workforce hours, resourcing and wellbeing, with effect from [Add date], Chief Officers, in discharging their responsibilities under the WTR undertake to:

- *Implement WTR compliant systems and governance to effectively record, monitor and report on working hours at an individual level and across forces for both police officers and staff.*
- *Utilise WTR as a guide to testing the resilience of working arrangements, personal approaches to work and overall, questions of wellbeing.*

Regulation 2, of the WTR, working time has the following definition:

“working time”, in relation to a worker, means

- any period during which he is working, at his employer's disposal and carrying out his activity or duties,
- any period during which he is receiving relevant training,

and "work" shall be construed accordingly;

See attached examples in annex.

Signed
National Police Chiefs Council

Signed.....
Police Superintendents' Association

Signed
Police Federation of England and Wales

Signed.....
Chief Police Officers' Staff Association

Annex to WTR MOU with examples for illustration

The key principles of 'working time' can be summarised as follows;

working time is an EU concept, which cannot be defined narrowly by a Member State and from which a Member State cannot derogate;

the concepts of a rest period and working time are mutually exclusive, with no intermediary category: see e.g. *Dellas v Premier Ministre* [2006] IRLR 225.

This agreement recognises the following as falling within the definition as outlined in Regulation 2 of the Working Time Regulations.

- Any period when an officer is working, at the Chief Officer's disposal and carrying out work activities or duties;
- Travel between home and any place of duty not being the officers usual place of duty;
- Travel between home and the officers usual place of duty, but at a time other than the rostered starting or finishing time for that day;
- Periods spent working while on-call (over the telephone or otherwise);
- Time spent on approved training or on approved professional study;
- Time spent working in an agile manner on a police-related task while absent from the workplace. This is illustrated below in examples 7, 8, 9, 10 and 11.

Taking these principles into account the following examples aim to be a guide to officers and Chief Constables as what should be recorded as working time.

Examples of Working Time

When an officer is on call, any periods spent working (over the telephone or otherwise) when in command or advising in relation to a planned or spontaneous event.

1. *An officer's normal place of duty is at their force headquarters in Maidstone, but they are required to attend and commence their duty the following day from Dover, so they travel directly to Dover from their home address and then travel home from Dover at the end of their duty. Their working time will commence from the start of their journey and conclude on their arrival home.*
2. *The officer travels to Maidstone which is their normal place of duty and works their rostered duty for the day there and then returns home. The officer is then recalled to Maidstone later that same day (within the same 24hr period) for further duty requirements (e.g. authorisation of a period of further detention). In this circumstance the working time will commence at the start time of the recalled journey and conclude on their arrival home.*
3. *Relevant training is defined as training provided by a force or a third-party provider to an officer to fulfil a policing need.*
4. *Undertaking a policing related task in an agile manner such as catching up on emails or creating/reviewing documentation/plans whilst at home on a rostered rest day or annual leave day.*
5. *If an officer is in their vehicle enroute to work whether they are on their normal commute or travelling to a temporary workplace and they receive/make a work-related call. The period of the call shall be treated as working time. (Recording this period as working time does not turn a commute into a claimable journey for the purposes of mileage allowances).*
6. *If an officer commutes to or from work on public transport and uses this time in an agile way to administer their emails/other documentation. The period of time for which they are working but not the whole commute, is recorded as working time.*
7. *An officer is off duty and is contacted unprompted on their personal mobile phone/landline to inform them of a work-related matter. This is working time.*
8. *An officer has been on-call from Monday to Friday on their working days and also undertaken numerous meetings that has meant they have a build-up of emails and administrative tasks. As a result, they decide to manage their responsibilities by working for a period the following day, which is a Saturday and their rest day. This is working time.*
9. *On a scheduled working day an officer has been in numerous meetings or engaged in a command role during the day that has meant they have a build-up of emails and administrative tasks. As a result, they decide to manage their responsibilities by working for a period that evening whilst at home. This is working time.*
10. *An officer was on annual leave, but they have since been made aware of new information or events that they were unaware of previously prior to taking annual leave, they then work for a period of time at home on their annual leave day, so they are fully prepared to competently commence work the following day. This is working time.*
11. *Where authorised by the line manager a period for professional study or continued professional development. This is working time.*

NOTE

It is not for the employer to define what is or is not work. Work is clearly defined by case law. However, it is the legal responsibility of the employer to accurately record and monitor an employee's hours and ensure there are no breaches of the Working Time Regulations 1998. It is therefore the responsibility of the employer to reduce and prevent the working practices as described

above if they do not wish them to be recorded as working time. Processes need to be developed by forces which do not yet have in place systems to monitor working time. Points 5, 7, 9, 10 and 11 are examples of when agreement should be reached by the officer with their force on what is acceptable work to undertake outside of 'normal working hours'. To be clear they do not need to do this every time they undertake work, but both the force and officer should know what is expected of them and record this agreement accordingly. This agreement can be recorded as part of a blanket permission between the officer and the force and it is expected that this will occur in all but exceptional circumstances. Any blanket agreement should be recorded in writing and reviewed periodically. The exception to this would be unplanned or immediate deployment scenarios.

10. Pensions Update

10.1 In July 2020 the government published its consultation entitled: 'Public service pension schemes: changes to the transitional arrangements to the 2015 schemes'.

The main points in the consultation are as follows:

- There will be a remedy period between April 2015 and March 2022
- For the remedy period all those in scope will be offered a choice of what pension scheme they wish to be part of
- The choice will either be an immediate choice as soon to April 2022 as possible or a deferred choice at the point of retirement
- There are numerous complex technical issues to resolve in relation to the implementation e.g. recalculating contributions, dealing with taxation (annual allowance being one element), resolving pensions for those already retired etc.
- On the 1st April 2022 all those still in service will be transferred from the legacy pension schemes to the CARE 2015 scheme.
- The costs of the remedy will be included in the revaluation of the pension that was 'paused' by the government.

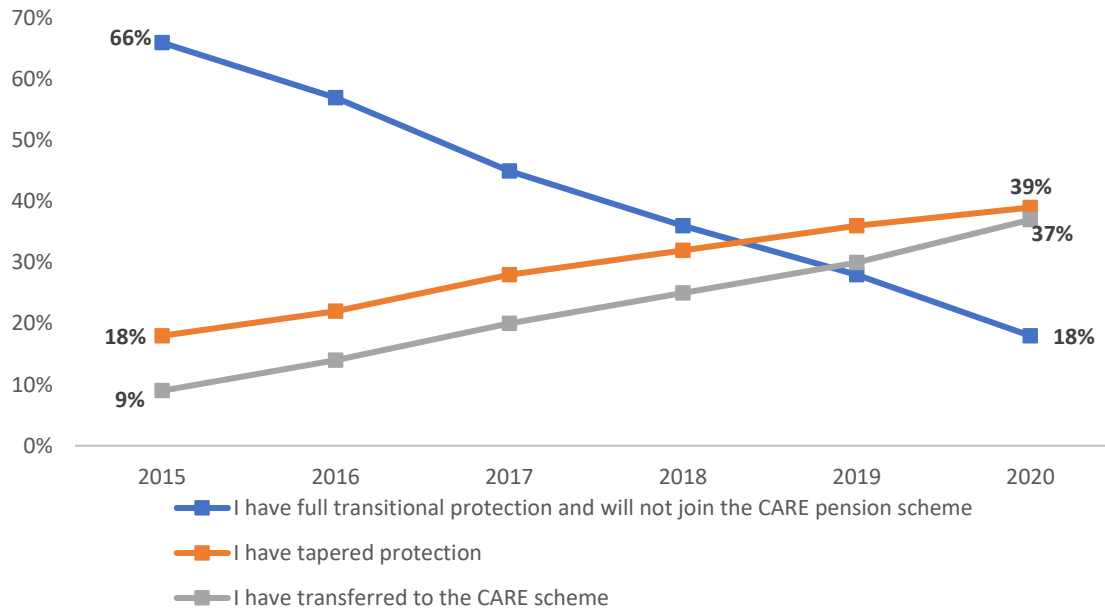
10.2 The PSA and SANI joint response to the consultation can be found [here](#)

10.3 These proposals are significantly affecting officers' morale and are likely to conflict with the government's 20,000 officer uplift programme and the ethos and values of the Police Covenant to be launched next year.

10.4 The following is useful evidence from the PSA 2021 Pay Survey:

The proportion of superintending ranks with full transitional protection continues to decrease, with 18% of respondents in the 2020 Pay Survey saying that they had full transitional protection and would not join the CARE scheme. 39% of respondents this year said that they had tapered protection, whilst 37% said that they had transferred to the CARE scheme; this compares to just 9% of respondents in 2015 when the CARE scheme was introduced.

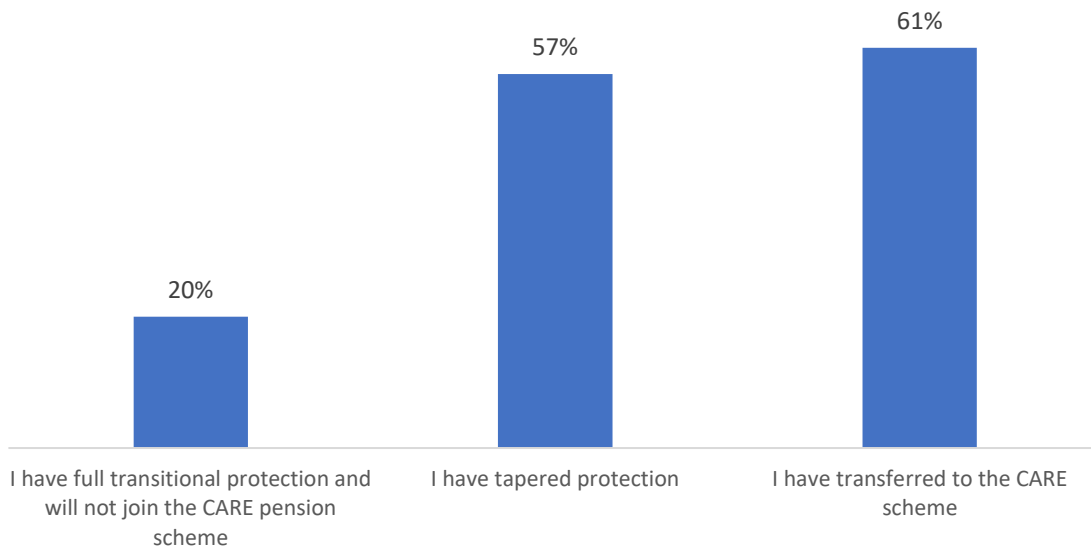
Pension scheme



10.5 Respondents currently in the CARE scheme and respondents with tapered protection were substantially more likely to be dissatisfied with their pension than respondents with full transitional protection. Correspondingly, the proportion of superintending ranks who this year said that they were dissatisfied with their pension was higher than in any other year that the Pay Survey has been conducted, with 49% of respondents in 2020 reporting that they were dissatisfied with their pension.

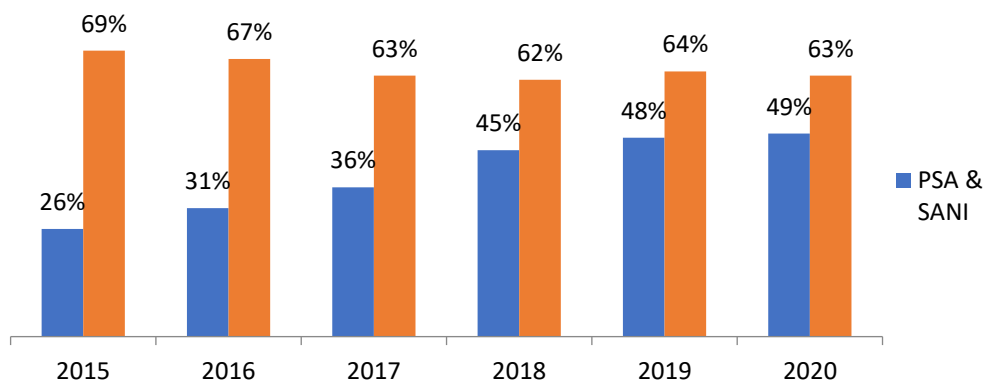
	Dissatisfied with pension	Satisfied with pension
2015	26%	61%
2016	31%	54%
2017	36%	52%
2018	45%	42%
2019	48%	38%
2020	49%	36%

Proportion of respondents reporting dissatisfaction with pensions



10.6 In most areas of the Pay Survey, the responses given by superintending ranks are typically much more positive than those given by members of the federated ranks. With regards to pensions, respondents in the PFEW Pay Survey are still more likely to be dissatisfied with their pension than respondents in the PSA and SANI Pay Survey. However, the difference between the two surveys have decreased considerably over time. Whereas in 2015 there was a 43 percentage point difference in the proportions of respondents from superintending ranks and federated ranks who were dissatisfied with their pension, in 2020 this difference has decreased to just 14 percentage points.

Proportion of respondents reporting dissatisfaction with pension in PSA & SANI and PFEW surveys since 2015



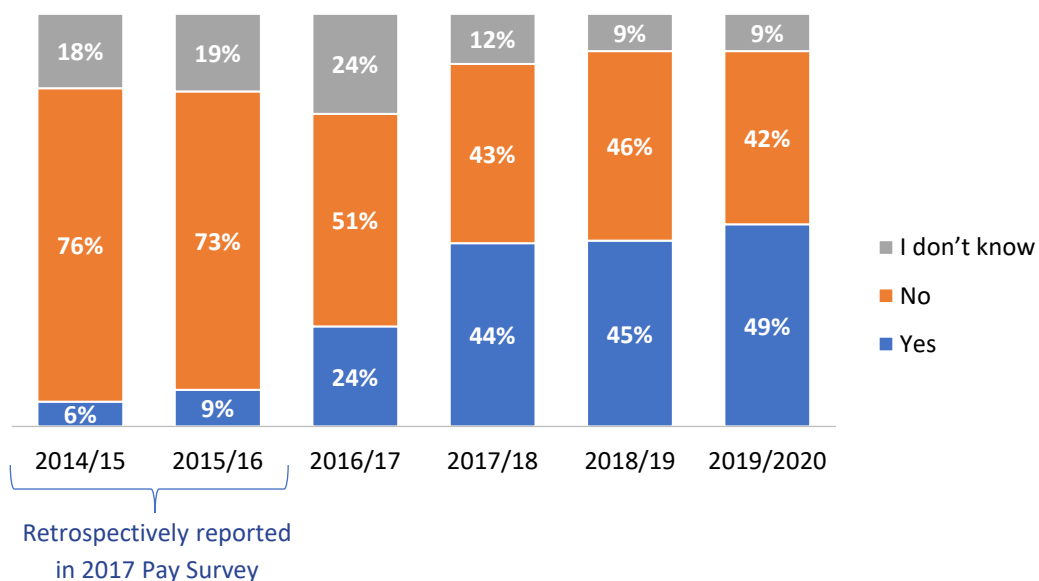
11. Annual Allowance

11.1 Each year the PSA reports to the PRRB on the impacts of annual allowance on the overall remuneration package of PSA. This year's report shows that the governments taxation policy continues to disproportionately effect the total remuneration package of our members.

11.2 The following is useful evidence from the PSA 2021 Pay Survey:

The proportion of respondents incurring an Annual Allowance charge in 2019/20 has continued to increase compared to previous years; just under half of respondents (49%) said that they incurred an Annual Allowance charge this year. Chief superintendents were more likely to have incurred an Annual Allowance charge compared to superintendents; 66% of chief superintendents said that they had incurred an Annual Allowance charge, in contrast to 43% of superintendents.

Did you incur an Annual Allowance charge in...?



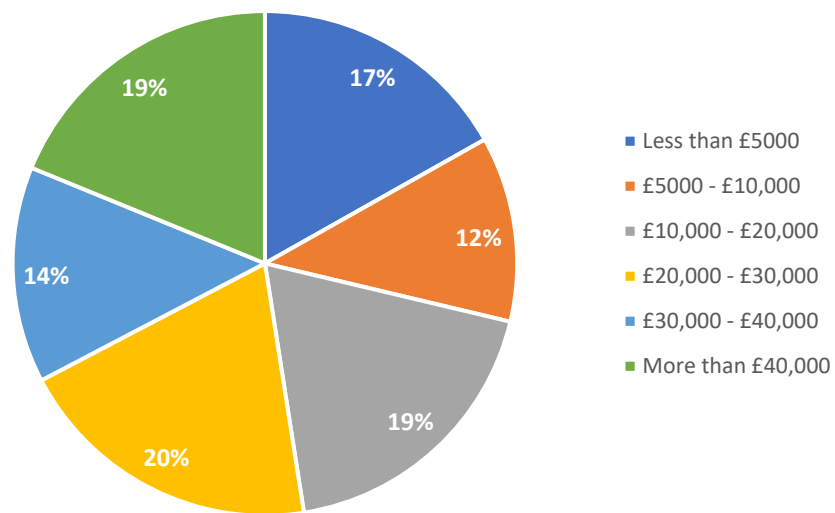
11.3 The most common reason for breaching the Annual Allowance threshold was respondents' normal pay increment; this was given as a reason for breaching the threshold by 53% of respondents, whilst one in five said that their inflationary pay increase had caused them to breach the threshold.

11.4 Over a quarter of respondents said that promotion to Superintendent caused them to breach the Annual Allowance threshold, a slightly higher proportion than in 2019. Amongst those who responded that they had breached the Annual Allowance threshold for another reason, the most commonly given reason was they had undertaken a period of temporary promotion to the rank of Chief Superintendent.

<i>Reason for breaching Annual Allowance threshold</i>	2019	2020
Normal pay increment	56%	53%
Inflationary pay increase	18%	20%
Promoted to Superintendent	21%	26%
Promoted from Superintendent to Chief Superintendent	14%	8%
Promoted through more than one rank	1%	<1%
Undertook a period of temporary promotion to Assistant Chief Constable/Commander	-	1%
Other reason	5%	4%

11.5 The average amount by which respondents had breached the Annual Allowance threshold this year was £21,872, up from £19,179 in 2018/19. 52% of respondents breached the Annual Allowance by more than £20,000.

By how much did you breach the Annual Allowance threshold?



Recommendation 9: That the PRRB highlight to the Home Office the cumulative negative effect on police workforce morale and potential threat to the 20K uplift program, created by the government’s policies in relation to the pay pause, proposed pension changes and annual allowance impact.

12. PSNI (SANI) Specific Issues

- 12.1 On the 19th November, the chair of SANI wrote to the Department of Justice in Northern Ireland requesting:

On behalf of the Superintendents' Association of Northern Ireland I welcome the opportunity to put forward matters to be considered for inclusion in the annual letter to the Police Remuneration Review Body.

Having consulted with members of the association, I recommend the inclusion of the following points: -

- 12.2 **Recommendation: Maintaining parity of pay with colleagues in Home Office forces in respect of core pay scales.**

Supporting Evidence: Data available to SANI shows where there is a disparity in remuneration, satisfaction rates drop significantly. For instance, in the most recent pay survey (2020)32% of officers in England and Wales were satisfied with their overall remuneration whereas in Northern Ireland, where allowances have fallen behind, only 18% stated they were satisfied.

- 12.3 **Recommendation: An increase in pay scales and the Northern Ireland Transitional Allowance in line with the cost of living.**

Supporting Evidence: Only 24% of SANI members believe they have received pay increases which will maintain their standard of living.

- 12.4 **Recommendation: Payment for on-call duties performed by superintending ranks, as is the case in the rest of the United Kingdom.**

Supporting Evidence: Despite colleagues in England and Wales having received an on-call allowance payable from September 2019 and repeated requests for this to be extended to Northern Ireland no such allowance is available to our members. 100% of SANI respondents perform on-call duties. 79% of respondents perform these duties on rest days and 40% on annual leave. 50% of these officers state they do not receive days off in lieu for these duties.

- 12.5 **Recommendation: Payment for rest days and public holidays that cannot be taken due to exigencies of duty (as previously tabled at Police Consultative Forum) and an extension of their availability to 24 months.**

Supporting Evidence: SANI's 2019 Resilience Survey shows that only 26% of respondents were able to take all their rest days and 100% of respondents were owed one or more rest days with the average being 11 days owed. Again, SANI members are now falling behind colleagues in England and Wales who can carry their rest days for 24 months.

- 12.6 Recommendation: Consideration of targeted payments or bonuses for superintending ranks with clearly defined parameters to ensure equality of opportunity to access these payments.**

Supporting Evidence: Again, colleagues in England and Wales have access to this payment but no defined criteria for a similar payment exists in Northern Ireland. During a SANI conference in 2019 55% of attendees indicated that they would be in favour of targeted payments.

- 12.7 Recommendation: In light of the ongoing challenge regarding the changes to police pensions (Aarons S & Others –v- (1) The Secretary of State for the Home Department (2) The Commissioner of Police of the Metropolis), an equal remedy is applied across all UK police services which will include the matter of compensation for those scheme members impacted by discrimination.**

Supporting Evidence: This issue is by far the most discussed issue amongst SANI members with 75% of SANI respondents stating that uncertainty regarding their pension caused a negative impact on their morale. The number of SANI members affected by this issue has increased significantly since the survey with a new cohort of officers having been promoted into the superintending ranks, therefore this issue will continue to affect the majority of members.

- 12.8 Recommendation: PRRB explores the PSA's evidence of breaches of the working time regulations and make recommendations to define within police regulations the working week for superintending ranks within the Police Service of Northern Ireland.**

Supporting Evidence: 75% of SANI respondents said the PSNI do not ensure, as an employer, that they comply with working time regulations. Discussions with PSNI Human Resources have highlighted the need for recording and measuring working hours. In the 2019 Resilience survey only 12% of respondents were satisfied with their working hours.

- 12.9 Recommendation: The tardiness of the current arrangements, whereby we are again required to enter into PRRB processes without having a full response from government to last year's PRRB recommendations.**

Supporting Evidence: To date (January 2021) SANI members have still not received their pay increase. These constant delays affect members' perceptions regarding the fairness of the PRRB process and the effectiveness of the Police Advisory Group (Northern Ireland). SANI continues to believe these issues would be better resolved if we had a Police Consultative Forum similar to colleagues in Great Britain.