

POLICE ADVISORY BOARD FOR ENGLAND AND WALES

EIGHTEENTH ANNUAL REPORT OF THE INDEPENDENT CHAIR

APRIL 2018 - MARCH 2019

2018-2019

Foreword

The Police Advisory Board for England and Wales (PABEW) was established as a non-departmental public body under section 46 of the Police Act 1964. During the year 2016, the PABEW was reclassified as a Stakeholder Group following a recommendation in the triennial review. Its membership and functions are set out in its constitution, which was revised and agreed in January 2015 and can be found at Annex C. It is tasked to:

- a. advise the Secretary of State on general questions affecting the police in England and Wales;
- b. consider draft regulations which the Secretary of State proposes to make under section 50 or section 52 of the Police Act 1996 with respect to matters other than hours of duty, leave, pay and allowances, or the issue, use and return of police clothing, personal equipment and accoutrements, or the ranks to be held by members of police forces, or the qualifications for appointment and promotion of members of police forces, or periods of service on probation, or the maintenance of personal records of members of police forces and to make such representations to the Secretary of State as it thinks fit;
- c. consider draft regulations which the Secretary of State proposes to make under section 37, 39, 81 or 83 of the Police Act 1997, and to make such representations to the Secretary of State as it thinks fit;
- d. consider draft regulations which the Secretary of State proposes to make under Part 2 of the Police Reform Act 2002, and to make such representations to the Secretary of State as it thinks fit;
- e. consider draft regulations which the Secretary of State proposes to make under section 1 of the Police Pensions Act 1976.
- f. establish the Scheme Advisory Board for the Police Pension Schemes, in accordance with the requirements of s7 of the Public Service Pensions Act 2013.
- g. it may also consider any matter relating to conditions of service (excluding those matters listed in section b above), and any other matter affecting the police which has been referred to it by the Secretary of State, and it will advise the Secretary of State on such matters within any time limit specified by the Secretary of State.

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Introduction

- 1.1 This is the eighteenth Annual Report on the work of the Police Advisory Board for England and Wales (PABEW) and the groups which meet under its aegis. It covers the work of the Board from the 1 April 2018 to the 31 March 2019.

What we do

- 1.2 The Board was established by statute to advise the Home Secretary on general questions affecting the police in England and Wales. It fulfils a role comparable to that of consultative bodies found in other fields of employment, and shares with them the objectives of engaging the expertise and experience of managers and staff alike in addressing the challenges of change and reform, and of providing a forum for the resolution of difficulties.
- 1.3 There is a separate Policing Advisory Group for Northern Ireland and a consultative forum for the police service in Scotland; both has its own pensions Scheme Advisory Board.
- 1.4 To ensure a flow of information and ideas in relation to police pensions a Police Pension Consultative Forum meets quarterly with membership drawn from England, Wales, Scotland and Northern Ireland.

2. Working Methods

- 2.1 Much of the substantive work of the Board is undertaken through expert working parties, which give detailed consideration to issues and make recommendations for decision by the full Board. Discussion by the Police Pensions Consultative Forum also feeds issues into the main quarterly meeting. Board meetings the focus on straightforward issues, consider the work of the working parties and the Forum and refer new matters to them, as appropriate, following initial discussion. This approach to business enables full meetings to be completed efficiently. The possibility of further efficiency by combining the agendas of the Police Pension Consultative Committee and the Scheme Advisory Board will be considered in 2019/20.
- 2.2 Working parties often include representatives of organisations able to provide specialist knowledge, in addition to representatives of the parties represented on the PABEW. In the period 2018/19 ad hoc groups met to consider medical capability dismissal, secondment guidance and the police response to the pension valuation.
- 2.3 This has been the fourth year of operation of the Police Pension Scheme Advisory Board (SAB). We have continued to develop the role of the board, relying heavily on the support provided through the NPCC and looking for opportunities to make use of data which is being

collected by the Department for their purposes to support our consideration of the efficiency and consistency in administration of the schemes.

- 2.4 Minutes of the PABEW quarterly meetings, which summarise all the work which comes under the aegis of the Board are regularly uploaded to our webpage.

3. Issues and recommendations

3.1 Annual Allowance

One of the key issues of concern has been the effect of Annual Allowance tax. In August 2018 I wrote to the then Minister for Policing to relay debate in the PPCF. Members had expressed their concerns that a number of senior police officers were being presented with large Annual Allowance tax charges as a result of promotions, temporary promotions and annual and mid-year pay increments, which are all captured as pension growth for the Annual Allowance tax charge. It has been suggested that this is affecting the numbers putting themselves forward for promotion and impacting on the options available to Chief Officers in maximising effectiveness. This tax is causing concern across the public sector, while there is willingness to look at the evidence we can gather, there is currently no proposed resolution.

3.2 Pension Valuation

The SAB received a formal commission for advice under Section 7 of the 2013 Act and Regulation 18 of the Police Pensions Regulations 2015, initiating formal consultation, with a view to reaching agreement under regulation 198 of the 2015 Regulations. The invitation was to recommend how the cost cap breach should be remedied. A working group was set which met on 29 October, 16 and 28 November. We benefited from input from GAD, and after careful consideration the SAB presented a consensus response to the responsible authority; that the cost cap breach revealed by the 2016 scheme valuation should be rectified by increasing the relevant CARE accrual rate. It is disappointing that the process has now been paused while the Government considers its response to the decision of the Courts in the cases of Sargeant and McCloud

3.3 Medical Capability Dismissal

It was pleasing that Ministers agreed in principle to the submission made by the PABEW for capability dismissal to attract compensation. The challenge this year has been to develop a robust business case which will be acceptable to all members of PABEW as well as Home Office and Treasury Ministers. Meetings were held in October, November and January to develop proposals. These are now being reviewed to ensure that there is no risk of age discrimination in the way that the proposed compensation is calculated.

3.2 Regulations and Determinations

The Home Office has continued providing quarterly updates of outstanding regulations and determinations. It was also agreed that there should be a more consistent way of communicating any changes. A new pro forma, an alternative to a Home Office circular, has been developed and introduced. The main concern is to ensure that it is indexed and readily searchable. We shall review its effectiveness over the coming months.

3.4 Summary

PABEW, has worked constructively to raise concerns about a range of issues and worked collaboratively to produce responses to a number of consultations. We continue to strive to gain timely responses and to drive change forward.

4. PABEW Discipline Sub-Committee

- 4.1 The PABEW Discipline Sub-Committee continues its work on police disciplinary and performance arrangements.
- 4.2 At the first meeting of the year, in April, the sub-committee considered Regulation 13. There was concern about whether it remained fit for purpose given changes in entry routes and requirements. It was agreed to remit this to NPCC and to consider it further in due course.
- 4.3 At the July meeting, the Committee discussed a paper presented by National Police Chiefs Council (NPCC) around drug testing regulations, which had not been looked at since 2012. The proposed changes related to the testing for substance misuse in relation to both random with cause testing of service officers and the ability to use hair samples in this testing procedure. Following the discussion NPCC was asked to collect more data to help assess the scope of the problem. The sub-committee will consider this further and has asked for confirmation as to whether the Home Office plans to review more generally the regulations relating to testing.
- 4.4 At the October meeting, the Committee had an extended meeting to allow the Home Office policy team to provide a walk-through of draft Regulations concerning the handling of complaints and disciplinary matters representing Phase 3 of the Police Integrity programme. The Committee had the opportunity to raise initial questions and concerns before responding formally to the consultation.
- 4.5 During January's meeting, the Committee had noted that the Independent Office for Police Conduct (IPOC) had issued for draft guidance on dealing with complaints. There was some concern that this might be seen to be at odds with pre-existing statutory guidance; it

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was agreed that this would be looked at and the concerns have now been addressed.

- 4.6 The sub-committee is an effective medium exploring existing and upcoming arrangements relating to police disciplinary, complaints and performance procedures which will affect the sector. During the year it has needed to remind those dealing with issues which might have an impact on discipline to share their work with the sub-committee. NPCC Guidance on Appropriate Relationship was one such example.

5. Scheme Advisory Board

- 5.1 The Police Pensions Scheme Advisory Board (SAB) is part of the required governance structure for the reformed public service pension schemes under regulation 7 of the Public Service Pensions Act 2013. Schedule 2 of the Act provides that the Home Secretary is the responsible authority who can make and amend the scheme regulations. Under regulation 7 of the Act there must be a scheme advisory board to advise the responsible authority, at the responsible authority's request, on the desirability of changes to the scheme. The governance arrangements also cover the Police Pension Scheme 1987 and the New Police Pension Scheme 2006.
- 5.2 The SAB can provide advice (on request or otherwise) to a scheme manager or to a police pension board in relation to the effective and efficient administration and management of the police pension schemes.
- 5.3 The most significant piece of work assigned to the PAB this year was in relation to the pension cap breach, which has already been referred to in section 3.
- 5.4 Over the past year, the SAB has kept in regular contact with The Pensions Regulator (TPR), and I have regularly attended their Public Sector Pensions Schemes Consultative Group. This contact helps to ensure we have been aligning our work with their key priorities: record keeping, internal controls and communications. At our October meeting in Edinburgh, TPR presented the outcomes from their most recent annual Governance survey. The gaps in performance by police forces were areas of focus for us during the year.
- 5.5 After each quarterly a Chair's letter has gone to scheme managers and pension board chairs. During the year, to supplement this, the NPCC Pensions Adviser, launched 'boardblast', a newsletter aiming to deliver more technical messages to pension boards and scheme managers.

5.6 Pension Calculator

Members of the SAB were involved in providing comments on initial version of the pension calculator which had been published on Gov.uk on 9 March 2018. It was pleasing that within the first few weeks the calculator had received 26,000 hits and 20,500 people had downloaded it. Comments and feedback received on the calculator were shared October SAB meeting, these were primarily about wording to assist understanding.

5.7 Guaranteed Minimum Pension

The SAB has been monitoring progress made on the engagement between independent forces and HM Revenue and Customs on the reconciliation of Guaranteed Minimum Pension (GMP). Good progress has now been made, though forces administering their own scheme or using their local authority seemed to have found the exercise more difficult than those using one of the large group administrators.

5.8 Summary: The four SAB meetings accounted for in this reporting period demonstrates that the Board has made progress in gathering relevant information, enabling us to effectively administer our functions. The close working between the NPCC Pensions Adviser and scheme colleagues from the Fire SAB has been useful and the training events run at Tally Ho in March, for administrators, and in May at Smith Square for Pensions Board members have been particularly valuable.

6. UK Police Pensions Consultative Forum

6.1 Covering UK-wide interests in pension related matters the UKPPCF in contrast to the SAB has a more informal role, which facilitates the exchange of ideas and encourages broad discussion amongst members. Substantive proposals are then progressed to the SAB or the PABEW main meeting, or the equivalent bodies in Northern Ireland and Scotland, as appropriate, for formal action.

6.2 Topics Discussed included the comparison of the way the pension valuation was treated across the UK, with updates on the progress of the cases of Sargeant and McCloud. The 2.25% limit on the 1987 and 2006 schemes commutation cap was another matter for debate, with staff associations and employers agreeing that there should be discretion, but Home Office had concern about how in year costs would be met.

6.3 Summary: The wide-ranging nature of discussion within the forum allows broad consideration of pension issues and, importantly, ensures that representatives from England and Wales, Scotland and Northern Ireland have an opportunity to share issues of concern and best practice. The unavoidable overlap with the SAB agenda does lead to some repetition, and with largely common attendance, we shall explore ways of retaining the benefits the two groups provide while streamlining the way we work.

7. Conclusion

- 7.1 All the groups continue to work constructively, representing different interests in a common cause. Our aim is to ensure the best possible advice is provided to Ministers on proposed regulatory change and to play our role in advising on pensions matters. We need to ensure that the profile of the PABEW is visible and its role understood by all who are charged to introduce change. We have continued to build our relationship with the College of Policing and IOPC and we are fully engaged in discussions on discipline. We need to ensure that we engage with those involved in workforce planning where pension or discipline issues might arise as a consequence of proposed changes.
- 7.2 As ever I am grateful to members for their contributions. This year, two longstanding contributors have moved on; Andy Fittes, PFEW and Francis Habgood, NPCC. Their personal commitment and diligence will be missed. We also said farewell to our secretary, Zahra Torabi and wish her well on her promotion.

Elizabeth France CBE

Independent Chair
Police Advisory Board of England and Wales

August 2019

Annex A - Members of the PABEW, 2018-19

Independent Chair

Elizabeth France

Association of Police and Crime Commissioners (APCC)

Andrew Tremayne

The London Mayor's Office for Policing and Crime (MOPAC)

Mike Wadham

Chief Police Officers' Staff Association (CPOSA)

Gareth Wilson

Shabir Hussain

Police Federation of England and Wales (PFEW)

Andy Fittes

Andy Ward

Alex Duncan

John Partington

Police Superintendents' Association of England and Wales (PSAEW)

Dan Murphy

Kate Halpin

National Police Chief's Council (NPCC)

Francis Habgood

James Hurley

Metropolitan Police Service (MPS)

Mark Pomroy

Metropolitan Police Service – Trade Union Side

Valerie Harris

Police Staff Council – Trade Union Side

Ben Priestley

Note: Members are regularly represented by alternates, the names of whom appear in the relevant quarterly minutes. We also extend a regular invitation to: The College of Policing, the IOPC, and the Association of Special Constabulary Chief Officers. The Scottish Government, the Police Federation of Northern Ireland, the Department of Justice, Northern Ireland, Police Scotland, the Scottish Police Federation and the Northern Ireland Policing Board.

While they are not Members the Home Office is appropriately represented at all meetings, presenting proposals for consideration, answering questions from Members and responding to emerging conclusions.

Annex B - Members of the SAB, 2018-19

Independent Chair

Elizabeth France

Association of Police and Crime Commissioners (APCC)

Andrew Tremayne

Geoff Petty

Chief Police Officers' Staff Association (CPOSA)

Gareth Wilson

Shabir Hussain

Police Federation of England and Wales (PFEW)

Andy Fittes

Andy Ward

Police Superintendents' Association of England and Wales (PSAEW)

Dan Murphy

National Police Chief's Council (NPCC)

Francis Habgood (now retired)

James Hurley

National Association of Retired Police Officers (NARPO)

Steve Edwards

Note: Members are regularly represented by alternates, the names of whom appear in the relevant quarterly minutes. We also extend a regular invitation to: The Scottish Government, The Police Federation of Northern Ireland, the Department of Justice, Northern Ireland, Police Scotland, the Scottish Police Federation and the Northern Ireland Policing Board.

While they are not Members the Home Office is appropriately represented at all meetings, presenting proposals for consideration, answering questions from Members and responding to emerging conclusions.

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Annex C – Attendance at PABEW Meetings, 2018-19

Four quarterly Board meetings were held over the period covered by this Report. No extraordinary meetings of the Board were called. As well as the members listed in Annex A, meetings were attended by Home Office officials, advisers to constituent organisations, members of the secretariat and observers. Their contributions are reflected in the published minutes.

Representation at meetings was as follows:

26 April 2018

Chair

The London Mayor's Office for Policing and Crime - 0

Metropolitan Police Service - 1

Association of Police and Crime Commissioners – 2

Police Federation of England and Wales – 3

Police Superintendents' Association – 2

Chief Police Officers' Staff Association – 2

Police Staff Council Trade Union Side – 0

National Police Chief's Council - 1

Metropolitan Police Service Trade Union Side – 1

Observers/in attendance – 7

TOTAL - 19

16 July 2018

Chair

The London Mayor's Office for Policing and Crime - 0

Metropolitan Police Service – 1

Association of Police and Crime Commissioners – 2

Police Federation of England and Wales – 3

Police Superintendents' Association – 2

Chief Police Officers' Staff Association – 1

Police Staff Council Trade Union Side – 0

Metropolitan Police Service Trade Union Side – 1

Observers/in attendance – 8

TOTAL – 18

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30 October 2018

Chair

The London Mayor's Office for Policing and Crime - 0

Metropolitan Police Service – 1

Association of Police and Crime Commissioners – 1

Police Federation of England and Wales – 2

Police Superintendents' Association – 2

Chief Police Officers' Staff Association – 1

Police Staff Council Trade Union Side – 0

Metropolitan Police Service Trade Union Side – 0

Observers/in attendance – 7

TOTAL – 15

29 January 2019

Chair

The London Mayor's Office for Policing and Crime - 0

Metropolitan Police Service - 1

Association of Police and Crime Commissioners - 1

Police Federation of England and Wales – 2

Police Superintendents' Association - 2

Chief Police Officers' Staff Association – 1

Police Staff Council Trade Union Side – 0

National Police Chiefs Council – 1

Metropolitan Police – Trade Union Side - 1

Observers/in attendance – 8

TOTAL - 18

Annex D - Attendance at SAB Meetings, 2018-19

Four quarterly Board meetings were held over the period covered by this Report. No extraordinary meetings of the Board were called. As well as the members listed in Annex B, all meetings were attended by Home Office officials. Representatives from devolved administrations, advisers to constituent organisations, the secretariat and observers also attended. Their contributions are reflected in the published minutes

Representation at meetings was as follows:

16 April 2018

Chair

National Police Chief's Council – 2

Association of Police and Crime Commissioners – 0

Police Federation of England and Wales – 2

Police Superintendents' Association – 1

Chief Police Officers' Staff Association – 1

National Association of Retired Police Officers – 1

Observers/in attendance – 5

TOTAL - 13

2 July 2018

Chair

National Police Chief's Council – 2

Association of Police and Crime Commissioners – 1

Police Federation of England and Wales – 3

Police Superintendents' Association – 1

Chief Police Officers' Staff Association – 1

National Association of Retired Police Officers – 1

National Police Chiefs Council - 2

Observers/in attendance – 9

TOTAL – 22

1 October 2018

Chair

National Police Chief's Council – 2

Association of Police and Crime Commissioners – 1

Police Federation of England and Wales – 3

Police Superintendents' Association – 1

Chief Police Officers' Staff Association – 1

National Association of Retired Police Officers - 0

Observers/in attendance – 7

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TOTAL – 16

14 January 2019

Chair

National Police Chief's Council – 2

Association of Police and Crime Commissioners – 2

Police Federation of England and Wales – 2

Police Superintendents' Association – 1

Chief Police Officers' Staff Association – 1

National Association of Retired Police Officers - 0

Observers/in attendance –8

TOTAL - 17

Annex E – Constitution (PABEW)

1. The Police Advisory Board for England and Wales ("the Board") will be established in accordance with this constitution. This constitution takes effect from 27 January 2015 all previous constitutions are revoked from that date.

Functions

2. In accordance with section 63 of the Police Act 1996, the Board will: -
 - h. advise the Secretary of State on general questions affecting the police in England and Wales, and
 - i. consider draft regulations which the Secretary of State proposes to make under section 50 or section 52 of the Police Act 1996 with respect to matters other than hours of duty, leave, pay and allowances, or the issue, use and return of police clothing, personal equipment and accoutrements, or the ranks to be held by members of police forces, or the qualifications for appointment and promotion of members of police forces, or periods of service on probation, or the maintenance of personal records of members of police forces and to make such representations to the Secretary of State as it thinks fit;
 - j. consider draft regulations which the Secretary of State proposes to make under section 37, 39, 81 or 83 of the Police Act 1997, and to make such representations to the Secretary of State as it thinks fit;
 - k. consider draft regulations which the Secretary of State proposes to make under Part 2 of the Police Reform Act 2002, and to make such representations to the Secretary of State as it thinks fit;
 - l. consider draft regulations which the Secretary of State proposes to make under section 1 of the Police Pensions Act 1976.
3. The Board will establish the Scheme Advisory Board for the Police Pension Schemes, in accordance with the requirements of s7 of the Public Service Pensions Act 2013.
4. The Board may also consider any matter relating to conditions of service (excluding those matters listed in section b above) and any other matter affecting the police which has been referred to it by the Secretary of State, and it will advise the Secretary of State on such matters within any time limit specified by the Secretary of State.

The Secretary of State

5. The Secretary of State may attend any meetings of the Board.

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6. The Secretary of State may in a matter of serious national importance to the police service direct the Board to consider and seek to reach agreement on such matters as he or she may specify.
7. The Secretary of State may in a matter of serious national importance to the police service set a deadline for the Board to complete consideration of such matters as he or she may specify
8. The Chair of the Board will submit an annual report on the work of the Board to the Secretary of State. Before doing so the Chair will consult the constituent parts of the Board about the proposed report.

Membership

9. The Board will consist of: -
 - A Chair appointed by the Secretary of State;
 - Members nominated by the Secretary of State;
 - Three representatives of the Association of Police and Crime Commissioners;
 - One representative of the London Mayor's Office for Policing and Crime;
 - Two representatives of the National Police Chiefs' Council of England & Wales (to include the Metropolitan Police Commissioner);
 - One representative of the Chief Police Officers' Staff Association;
 - Two representatives of the Police Superintendents' Association;
 - Five representatives of the Police Federation of England & Wales;
 - One representative from the Trade Union Side of the Police Staff Council;
 - One representative from the Trade Union Side of the Metropolitan Police Whitley Council.

Others may be invited to attend and contribute as appropriate.

Meetings

10. All meetings of the Board will be called by the Chair with appropriate notice to the members concerned.
11. The Board will normally meet four times a year.
12. The Board may establish working parties to address specific issues as it thinks fit.
13. A member of the Board may request the consideration by a meeting of the Board of any matter specified by them and may submit to the Chair papers relating to that or any other matter covered by the remit of the Board as defined in paragraphs 2 and 3.

Annex F – Constitution (SAB)

Remit

The remit of the SAB is:

- To provide advice, on request, to the Secretary of State for the Home Department on the desirability of changes to the police pension schemes.
- To provide advice, on request or otherwise, to police pension scheme managers and pension boards in relation to the effective and efficient administration and management of the police pension scheme 2015 and any statutory pension scheme that is connected with it.

The SAB will fulfil the above remit by appropriate means, including:

- Monitoring performance against the cost cap for the police pension schemes
- Benchmarking performance information as appropriate
- Identifying and sharing good practice

Purpose

The purpose of the SAB is to be both reactive and proactive. It will seek to encourage best practice, increase transparency and coordinate technical and standards issues.

It will consider items passed to it from the Home Office, the SAB's sub-committees and other stakeholders as well as items formulated within the SAB. Recommendations may be passed to the Home Office or other bodies. It will have a liaison role with the Pensions Regulator. Guidance and standards may be formulated for local scheme managers and pension boards.

Accountability

The SAB is accountable to the Secretary of State for the Home Department as the responsible authority for the Police Pension Schemes.

Chair

The Chair of the Board shall be independent and appointed as described in the membership table below. Where the Chair is not in attendance at a Board meeting, the Board shall appoint an acting Chair from the present members for the meeting in question. At all Board meetings, it shall be the duty of the Chair to ensure that all Board members show respect to the process and are provided with equal access to the floor. The Chair shall also determine when

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consensus has been reached and how to record the conclusion of discussion where consensus was not achieved.

Co-optees

The SAB may at its discretion co-opt persons in order to assist with the effective operation of the Board. Such persons would not be members of the Board. Where co-optees are invited they would need to sign up to a confidentiality agreement and statement agreeing to act in the interests of the police pension schemes as a whole and not in the interests of any organisation they may represent.

Sub-Committees and Working Groups

The SAB may establish sub-committees and working groups as and when required, whether short-term or otherwise. The SAB will be responsible for developing and agreeing the terms of reference and membership of any sub-committees. The SAB will also be responsible for outlining the purpose of any working group, its membership and detailing when and how that working group should report back to the SAB.

Secretariat

The secretariat shall be provided by the same secretariat that supports the Police Advisory Board for England and Wales.

Meetings

The SAB will meet no less than three times a year and may meet more frequently at the request of either the Chair or on the joint request of two or more SAB members. Except in situations to consider matters of urgency, all meeting dates will be communicated at least one month in advance.

Quorum

The SAB shall require there to be a minimum of 2 employer and 2 employee side representatives in attendance for a meeting to be quorate. Member substitutes will count towards the quorum.

Decision Making Process

The Scheme Advisory Board will achieve agreed and acceptable resolutions through consensus decision making, thereby seeking the consent of all parties. It is therefore inappropriate to establish any voting rights of members. In the event of failing to reach a consensus the Scheme Manager will be informed accordingly and individual or collective submissions may be made.

Review

These terms of reference were reviewed in October 2015, following the initial six months of the SAB's existence and periodically thereafter.

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Membership

The membership of the SAB is set out below. Other advisors and observers may be invited to attend meetings as agreed by the Chair and members.

Seat	Representing	Appointment/Nominee
Chair	Independent	Secretary of State
Scheme Employers	National Police Chief's Council	Nominated by the individual associations.
	Association of Police and Crime Commissioners	
Scheme Members	Police Federation of England and Wales	
	Police Superintendents' Association	
	Chief Police Officers' Staff Association	
	National Association of Retired Police Officers	
Advisors	Actuarial/legal as required.	
	Home Office	