



Home Office

# Police Covenant for England and Wales

Response to the consultation

8<sup>th</sup> September 2020

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## Introduction

### **Police Covenant for England and Wales – Response to consultation**

The Home Secretary announced at the Police Superintendents' Conference in September 2019 that she would launch a public consultation on the Police Covenant, focusing on health and wellbeing, physical protection and support for families.

The Government committed in its 2019 Manifesto to putting the Covenant into law.

On 26 February 2020 the consultation on A Police Covenant for England and Wales was launched. The consultation closed on 22 April. Due to the Covid-19 pandemic a small number of responses were received after the deadline. In the circumstances it was considered important that these were included in the analysis. A total of 1113 questionnaire responses were received. We also received narrative responses from a small number of key stakeholder groups.

Ninety percent of respondents stated that they support the idea of the Police Covenant.

We recognise too that this represents a pivotal moment for policing and welcome the recognition by policing partners that supporting and protecting our police includes creating a truly inclusive environment, in which people from all backgrounds and walks of life can thrive. The Home Office remains committed to working with policing to broaden representation and make sure that diversity is not just accommodated but is actively promoted. This will ensure policing can continue to attract and retain the most talented individuals with a broad range of skills and experience.

It should be noted that the consultation document specified that pay and pensions were out of scope of the covenant. However, a significant number of respondents made references to both in their responses. We have included some of the comments in this response to ensure we accurately reflect concerns raised in the course of the consultation, even where those subjects are out of scope.

### **Context**

The police do a unique and remarkable job in the face of enormous challenges and pressure. The Government has proposed plans for a Police Covenant, enshrined in law, to recognise this and provide the protection and support they deserve.

Last year, the Home Office's Front Line Review (FLR) highlighted concerns of police officers and staff and the need to do more to help them.

The Review identified a wide range of issues, including:

- Frontline officers, staff and volunteers feeling undervalued by the wider policing system;
- A disconnect between the front line and senior/national decision makers; and
- Scepticism about wellbeing measures, and a desire to see meaningful action with a lasting impact.

This highlighted the need for urgent action to ensure the police were fully supported and valued. A package of immediate measures was brought forward in response, but the Government has continued to look for ways to do more to improve police welfare and address these concerns.

In September 2019, the National Police Chiefs' Council commissioned an urgent review of officer and staff safety on behalf of all Chief Constables. The review focused on officer safety training, equipment, deployment and operational planning, investigations into officer assaults including the care provided after an assault and the response from the criminal justice system, and the extent to which it is providing a sufficient deterrent.

The findings from the review were published on 2 September, with a total of 28 recommendations. These focus on aspects such as personal safety training, protective equipment, wellbeing, line manager support and criminal justice outcomes. It is particularly important that, where possible, we look for opportunities to progress the recommendations under the remit of the Covenant and use the findings to inform our development of this work.

In November 2019, the National Police Wellbeing Service (NPWS) launched the first ever National Police Wellbeing and Inclusion survey. The aim of the survey was to assess the current state of wellbeing and inclusion across all 43 police forces in England and Wales and to establish how people are feeling at work so that the NPWS could build a clear picture of what further action is required. The findings of this survey will be taken into consideration as we begin to implement the covenant.

In January 2020 the Joint Agreement on Offences against Emergency Workers was published. The agreement was signed by The Crown Prosecution Service, National Police Chiefs' Council, NHS England, National Fire Chiefs' Council and Her Majesty's Prison and Probation Service. The agreement provides for a broad framework to ensure the more effective investigation and prosecution of cases where emergency workers are the victim of a crime, particularly in applying the provisions of the Assaults on Emergency Workers (Offences) Act 2018 and to set out

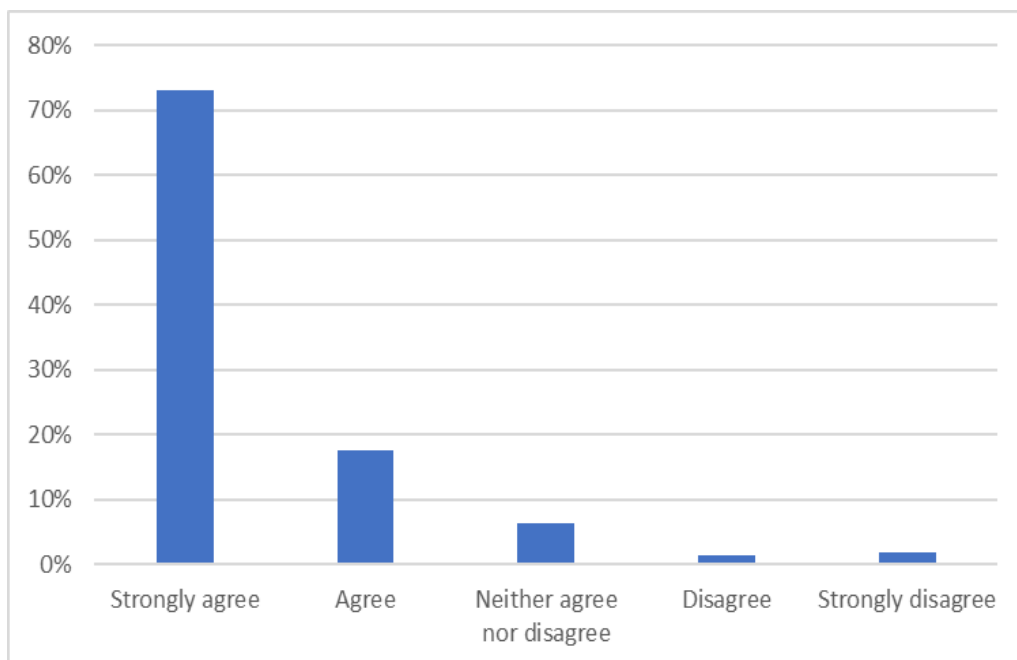
the standards victims of these crimes can expect.

Building on all of the above, the introduction of a Police Covenant is the next step to provide comprehensive, meaningful and lasting support to those working in policing. There is an opportunity to bring together some exciting work that is already in train with newly identified projects to make a comprehensive difference to the lives of those working or who have worked within policing.

The Police Covenant would build on existing work to improve wellbeing and encourage enhancement of such support. It is separate from any decisions and processes around pay and conditions and pension provisions.

### Is there support for the idea of a Police Covenant?

#### To what extent do you agree that it would be beneficial to have a Police Covenant?



Based on 1,097 respondents

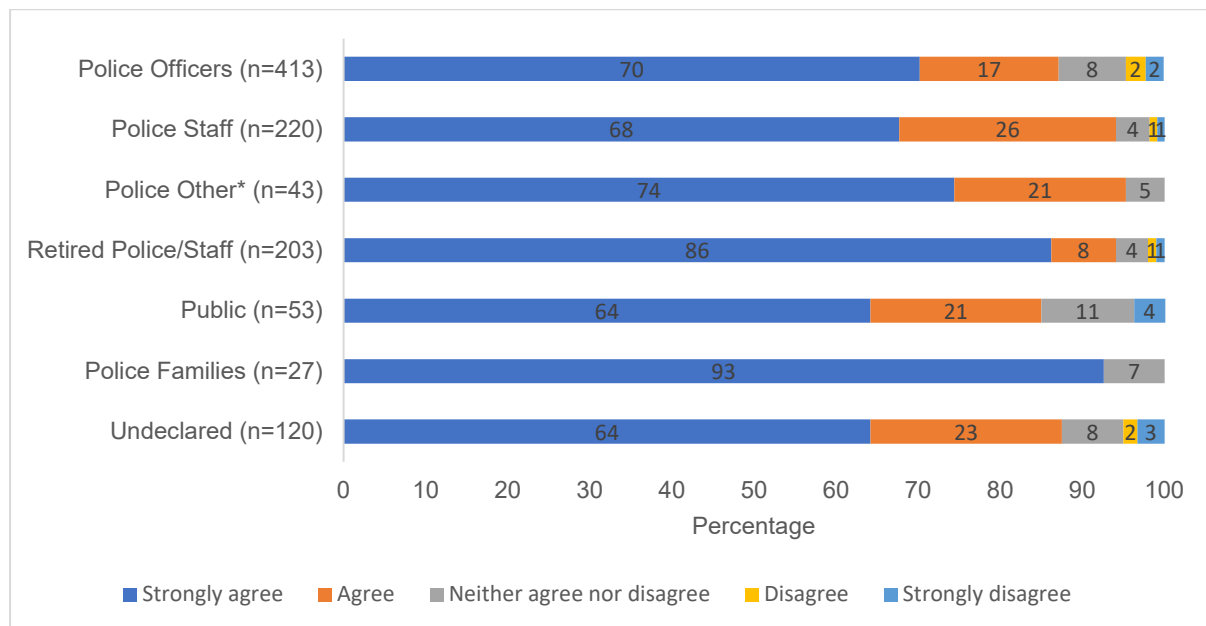
Over 90% of respondents either agreed or strongly agreed with the idea of a Police Covenant for England and Wales. There was also support for bringing non-Home Office Forces within the scope of the Covenant. Additionally, there was a clear indication from respondents that the Covenant should cover all those working within policing in both paid and voluntary capacities. The Police Covenant is a public statement of support for those working in policing.

## Who responded?

A high proportion of respondents were serving officers with the next largest groups being police staff and retired officers. Five percent of responses were received from members of the public, additionally a small number of responses were from police widows, Police and Crime Commissioners (PCCs) and police families.

## Support for the Covenant by group

### To what extent do you agree that it would be beneficial to have a Police Covenant?



\*Predominantly PCSOs

NB: Percentage breakdowns for volunteers and representative bodies have been excluded due to their small sample size. Out of the 14 volunteers that responded to the question 'to what extent do you agree that it would be beneficial to have a Police Covenant?', 13 strongly agreed and one agreed. Of the four representative bodies that responded to this question, all four strongly agreed.

Additionally, narrative responses were received from a number of policing stakeholders and staff associations.

## Who supported the principle of a Covenant?

Support for the principle of the Covenant came from all categories of respondents. Those who strongly agreed with the principle of a Covenant felt that staff and volunteers, as well as retired police, should be within scope. Specific concern was expressed regarding the support available following retirement, especially when retirement is on ill health grounds.

The issue of officers being “always on duty” was a recurring theme in responses, and questions were raised around this being necessary in modern life. There was a strong desire to ensure that the cumulative effect of mental trauma throughout careers is recognised.

*“Police officers commit to being part of a 24/7 service, but the Government has a role to monitor, understand and mitigate the effects.”*

### **Who did not support the Covenant?**

A total of 35 of respondents (3%) actively disagreed with the concept of the Covenant and over half of that group were serving officers. The predominant reason given was that they felt nothing would change as a result of the Covenant. Some stated that the draft Covenant was not bold enough. A small number of this group of respondents suggested it should only apply to police officers whilst others wanted to see police staff included before they felt they could support it.

### **Should it be enshrined in law?**

Support for a legislative footing for the Covenant was broadly in line with support for the covenant.

Some examples of comments include:

- “Legislation imposes an enduring duty beyond mere expressions or affirmations of principle and extends the duty to consider police protection to the Executive, Legislature and Judiciary as well as across society”.
- “The Covenant can offer oversight of other key legislation that helps keep the police family safe such as Health and Safety, Human Resources policies. It ultimately creates the requirement to review progress and compliance. It offers the opportunity to challenge a position taken when this is appropriate.”
- “The Covenant should identify and enshrine within the legislation a custodian role. That person will document a national plan that will deliver the Covenant’s objectives, and at the same time that individual will be held accountable.”

Of those who felt it should not be enshrined in law, the reasons given included a lack of confidence that it would make any difference in real terms. Some respondents referred to the changes made to the police pensions schemes in recent years, suggesting that these changes did not signal support for police.

## Covenant wording

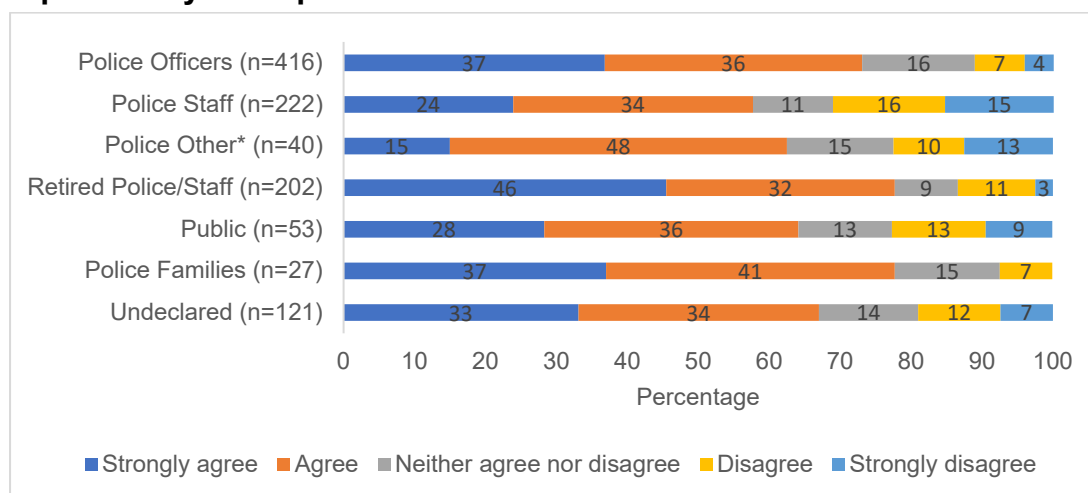
Support for the draft wording was less clear cut.

**DRAFT - Police Covenant:** This Covenant recognises and acknowledges the sacrifices made by those who serve or have served in our Police Forces, or hold the office of Special Constable. It is intended to ensure that they and their families are not disadvantaged as a result of that commitment and seeks to mitigate the impact that has on day to day life.

The Covenant recognises that police officers are not employees but rather hold the office of constable, which comes with a high level of personal accountability and responsibility in their role to make communities safer by upholding the law fairly and firmly; preventing crime and antisocial behaviour; keeping the peace; protecting and reassuring communities; investigating crime and bringing offenders to justice. They must also abide by a code of ethics which sets out the high standards of behaviour expected from everyone who works in policing in England and Wales, both on and off duty. This recognition extends to voluntary and charitable bodies, private organisations, and the actions of individuals in supporting the police forces. Recognising those who have performed policing duty unites the country and demonstrates the value of their contribution. This has no greater expression than in upholding this Covenant.

## Support for the draft wording of the Covenant by group

**To what extent do you agree/disagree that the draft Covenant above represents your expectations?**



\*Predominantly PCSOs

NB: Percentage breakdowns for volunteers and representative bodies have been excluded due to their small sample size. Out of the 14 volunteers that responded to the question 'to what extent do you agree/disagree that the draft Covenant above represents your expectations?', 10 strongly agreed, three agreed, and one disagreed. Out of the four representative bodies that responded to this question, two agreed and two disagreed.



Those who strongly agreed with the wording gave a clear message that the Covenant should cover staff and volunteers as well as retired police and a number mentioned that it should also cover non-Home Office forces. We heard that around 40% of those working in policing are staff and many of these are in front line roles such as Scenes of Crime Officers.

Those who disagreed felt the draft was not as strong as the Armed Forces Covenant. Those who strongly disagreed mainly wanted to see police staff included; some felt it needs to be bolder. Pay and pensions were raised as reasons for scepticism from respondents. **The words pay, pension, salary, wage and reward were mentioned by a total of 410 (37%) respondents.**

We heard that the draft Covenant set out what is expected from the police and does not say enough about what the Covenant would do to support them in terms of practical support.

In light of the feedback above, changes have been made to the draft Covenant:

#### **PROPOSED NEW DRAFT - Police Covenant**

This Covenant acknowledges the sacrifices made by those who serve or have served in our Police Forces, either in a paid or voluntary capacity, whether as an officer or as a member of staff. It is intended to ensure that they and their families are not disadvantaged as a result of that commitment and seeks to mitigate the impact on their day to day life or in their access to justice.

Police officers are required at all times to uphold the important principles of policing by consent, the foundation of their long-standing relationship with the public. We ask a great deal of our police and we expect the highest standards to be maintained. In return, we have a responsibility to provide protection and support to the police.

The Covenant recognises that working within policing comes with a high level of personal accountability, duty and responsibility requiring courage and personal risk both on and off duty. This recognition extends to all those who support police forces in upholding the principles and practices of their vocation. Recognising those who have served in policing unites the country and demonstrates the value of their sacrifice. This has no greater expression than in upholding this Covenant.

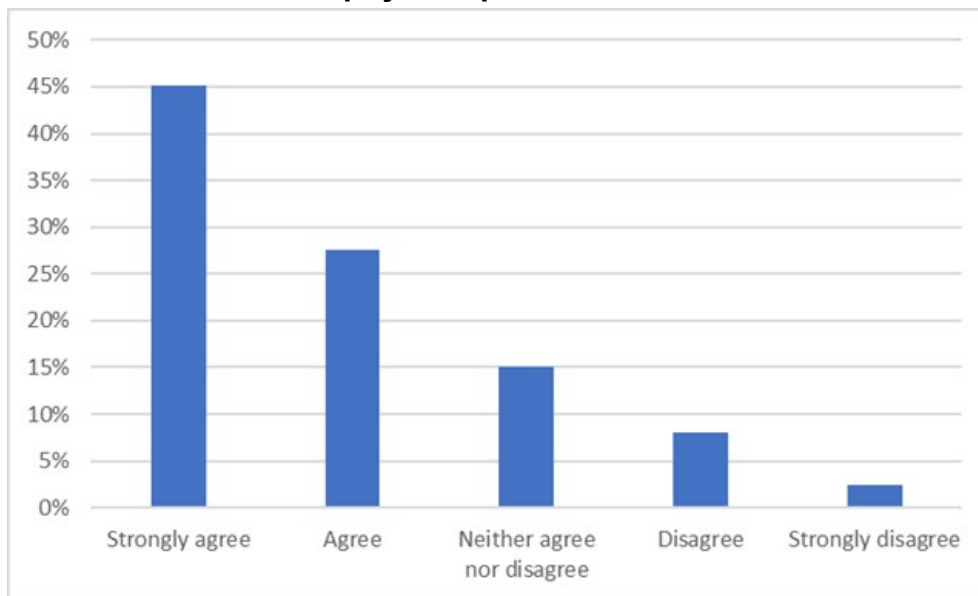
The draft Police Covenant is kept at a high level to enable it to be agile and to quickly add themes as the need evolves.

The consultation explored three key themes which are being considered as a focus for the Covenant:

- Physical Protection
- Health and Wellbeing
- Support for families

## Physical Protection

**To what extent do you agree/disagree that it would be beneficial for the Covenant to focus on physical protection?**



Based on 1,093 respondents

We saw a high level of support for the inclusion of physical protection as a theme for the Covenant. We heard that there is a moral duty to protect those whom we ask to go into harm's way on our behalf. Those who were supportive mentioned:

- National standards for personal safety training and kit
- A national procurement approach for uniform and equipment
- Personal Protective Equipment (PPE) (Covid is mentioned as a driver for this)
- Better occupational health
- Double crewing
- Access to justice when assaults occur.

*“A national procurement strategy for the provision, standardisation and consistency of goods and services including PPE, uniforms and equipment would be beneficial for the police service.”*

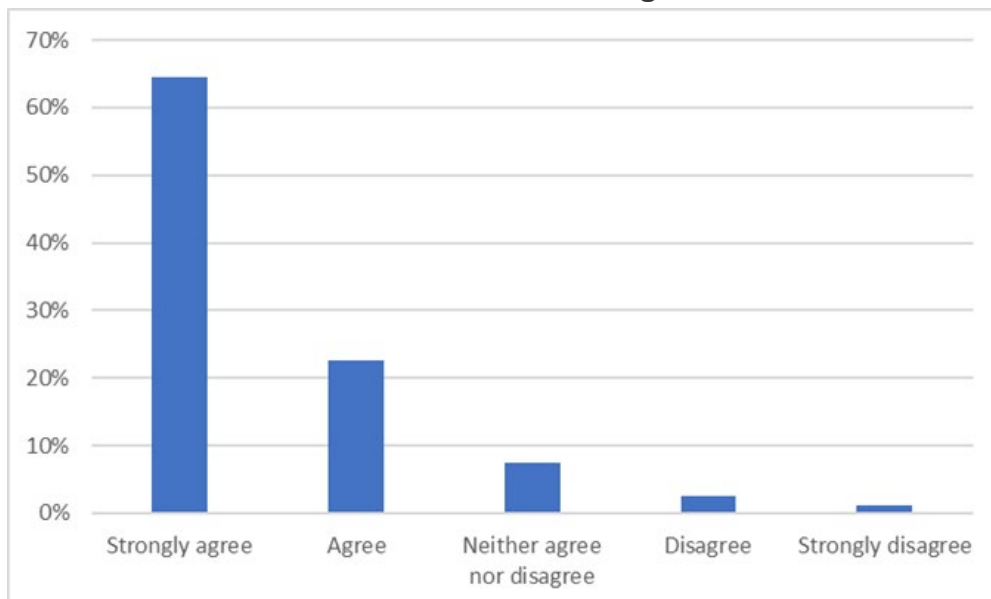
*“All safety equipment should be subject to an Equality Impact Assessment.”*

We can expect to perform at our best when we feel safe and cared for. If we are expecting those working in policing to deliver to high standards it makes sense for us to do all we can to ensure that they are made to feel safe, well equipped and that if they are harmed, they can expect justice to be done. Racism has no place in our country and we will not tolerate it. Anyone working in the policing family deserves support and protection, and the respect of all the British people.

Of those who strongly disagreed that physical protection was important in terms of the Covenant, the reasons given were that mental health is of greater concern and physical injuries more often make the headlines. The cumulative effect on mental health of a career of exposure to stress and trauma is said to be a more urgent issue. There is recognition across healthcare settings in the UK that parity of esteem should be given to physical and mental health.

## Health and Wellbeing

**To what extent do you agree/disagree that it would be beneficial for the Covenant to focus on health and wellbeing?**



Based on 1,094 respondents

There is strong support for a focus on Health and Wellbeing. There were some themes identified from the responses:

- Fast access to medical care is a priority
- Repeated exposure to “the worst of humanity”. The **cumulative effect** of attending traumatic incidents with a lack of follow up from supervisors was a common theme.
- Once a serious incident was over there was often no mention of it again and that there is a lack of debriefing.
- **Assaults** not taken seriously.

- Lack of breaks and not enough down time – **always on duty**.
- Cancelled leave and unpredictable working patterns.
- Work life balance.
- Patchy occupational health provision.
- Inequality in the provision of occupational health services between Forces.

There was evidence presented to support the idea that the health and wellbeing of officers should be considered holistically. Proactive mental health support and access to good quality physical fitness resources were seen as important in the prevention of future issues. A number of respondents mentioned that a healthy and supported workforce can lead to improved discretionary effort, in turn resulting in improvements in performance.

*“There are lots of police charities delivering support for health and wellbeing. Everyone should have access to these services, not just those who pay fees.”*

Timely access to medical health was identified as an issue, by a number of respondents. There was some support for special consideration being given to those working in policing which would allow for faster access to some stretched health services such as mental health support. This could be delivered by enhancing the services currently delivered by charities if funding models were addressed.

### **Retired officers and staff**

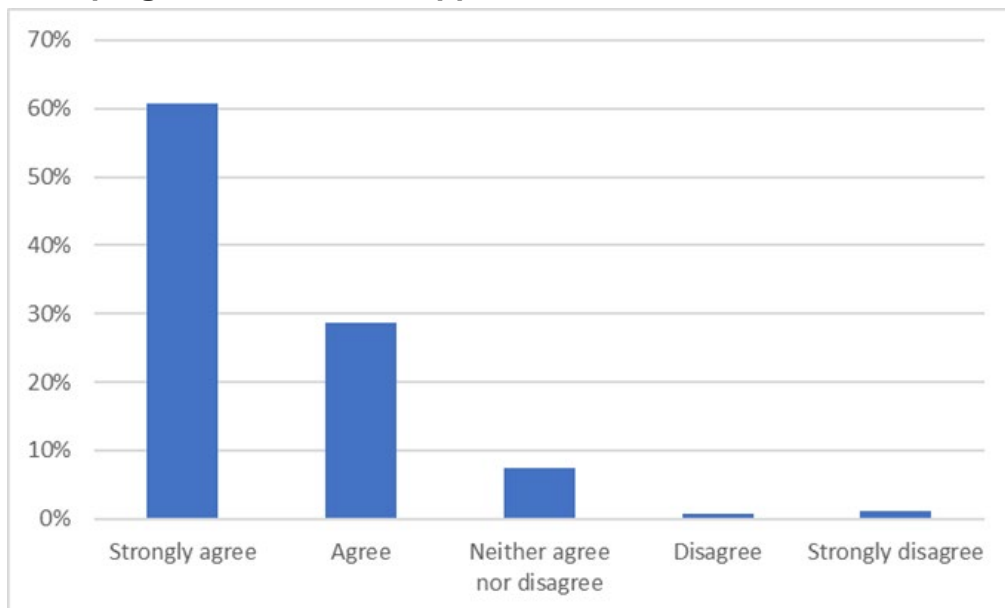
Respondents told us that the issues identified above do not end at retirement. Many of the respondents who described themselves as retired reported flashbacks to incidents from their career which caused ongoing mental health issues, with no access to dedicated support.

### **Those who disagree with Health and Wellbeing inclusion**

Twenty-four respondents (2%) disagreed with the inclusion of Health and Wellbeing as a focus for the Police Covenant. The reasons given were not to do with health and wellbeing, but with the relevance of the Covenant as a whole: either that they did not feel that the Covenant would deliver any real improvements or that unless it included police staff it was not possible to comment. This meant that a small number of respondents chose not to support any elements of the Covenant.

## Support for families – what can be done?

To what extent do you agree/disagree that a Police Covenant could add value in helping families to feel supported?



Based on 1,087 respondents

The responses included a strong recognition that family life is often disrupted by the cancellation of leave and unpredictable working patterns and this was seen to be undermining support for families.

*“Missed birthdays and sports days due to cancelled leave and unpredictable work schedules are a way of life, it doesn’t have to be this way.”*

Some respondents mentioned the need for a network to support families in dealing with some of the unique stresses stemming from police work.

In response to questions regarding honours we heard that there is still a strong feeling that medals are only given to senior officers despite recent changes/efforts to achieve greater recognition for other ranks.

Although pensions were out of scope of the consultation the strength of feeling about changes to pensions was reflected in the way some respondents felt about the concept of the Covenant.

## Conclusion

There is clear support for a Police Covenant for England and Wales, for that support to extend to some non-Home Office forces and for all those working within policing to

be within scope. Enshrining the Covenant in law is seen as a way of ensuring it remains a priority, with annual reports to Parliament bringing progress into focus. The support for the introduction of a Covenant reflects the findings of the FLR, National Police Wellbeing and Inclusion Survey and the Officer Safety Review.

The importance of an inclusive approach to the Covenant came across very strongly throughout the consultation. Excluding any one group from the Covenant would be damaging to the overall concept. Representations from non-Home Office groups setting out the parallel with their lived experience show the importance of exploring ways to extend the reach of the Covenant to bring them within scope.

The three proposed initial areas of focus (physical protection, health and wellbeing, and supporting families) were broadly seen as important to policing. The need for support will always be evolving and therefore it is vital that the Covenant is agile and able to flex to respond to emerging needs. To achieve this, it is important that the legislation is not so tightly drafted as to inadvertently preclude actions or responses to new situations that may be desirable or useful in future.

Enshrining in law the requirement for the Secretary of State to report to Parliament on progress made on the Covenant on an annual basis (i.e. as opposed to more specific or prescriptive provision as to the substance or effect of the Covenant) would provide the necessary flexibility whilst also maintaining oversight and focus on improvements.

Much is already being delivered in the Health and Wellbeing space and in terms of Support for Families through a range of charities. The National Police Wellbeing Service is currently funded through a grant to the College of Policing and is doing some outstanding work to address wellbeing issues at a national level.

The introduction of a Police Covenant could bring coherence to the landscape of police support. A robust governance structure with representatives from all key players could provide a layer of strategic planning across the landscape. It can be challenging for some smaller charities to access grants and other one-off funding allocations from central government. Good governance could deliver better access to grants for smaller charities.

The National Policing Board (NPB) could provide the governance for the delivery of the annual report to parliament. The NPB could commission projects to deliver a prioritised set of objectives and take ownership of compiling the annual report for the Secretary of State.

Key roles which have been suggested by respondents to the consultation include a Commissioner for the Covenant and a Chief Medical Officer for Policing for England and Wales.

## Proposals

- I. Her Majesty's Government should legislate for the Home Secretary to report annually to Parliament on progress on the Covenant.
- II. The scope of the Covenant should include all those working within, or retired from policing roles, whether paid or as a volunteer.
- III. The focus of the Covenant in the first instance to be on:
  - Physical Protection
  - Health and Wellbeing
  - Support for Families
- IV. A governance structure should be established, reporting to a high-level policing board.
- V. The board should further consider the benefits of establishing a new role of Chief Medical Officer for Policing for England and Wales.
- VI. The board should explore options for bringing current activity within the purview of the Covenant and consider the governance needed to drive forward that activity.
- VII. There should be an option for non-HO forces to join the Covenant via a Memorandum of Understanding, on a case by case basis, agreed with the relevant department.

## Summary of responses

### Respondents:

Respondent group	Total number of responses
Family	16
Group	4
Police and Crime Commissioner	9
Police Community Support Officer	34
Police Officer	416
Police Staff	223

Public	53
Police widow	11
Retired police officer	201
Retired Staff	2
Undeclared	130
Volunteer	14
Total	1113

Question 1 - To what extent do you agree that it would be beneficial to have a Police Covenant?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	799	193	70	16	19

Question 3 - To what extent do you agree/disagree that it would be beneficial for the Covenant to be enshrined in legislation?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	770	211	81	13	19

Question 5 - To what extent do you agree/disagree that the draft Covenant above represents your expectations?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	379	386	143	116	75

Question 7 - To what extent do you agree/disagree that it would be beneficial for the Covenant to focus on physical protection?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	502	307	168	89	27

Question 10 - To what extent do you agree/disagree that it would be beneficial for the Covenant to focus on health and wellbeing?



	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	718	251	83	29	13

Question 13 - To what extent do you think that the Covenant should include support for families?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	676	319	82	9	12

Question 17 - To what extent do you agree/disagree that training can contribute to improved safety?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	625	366	80	14	13

Question 19 - To what extent do you agree/disagree that government has a role to play in setting standards for safety equipment for policing?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	652	271	96	55	20

Question 21 - To what extent do you agree/disagree that consistent national standards for personal safety training could contribute to improving safety in policing?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	590	337	120	32	11

Question 23 - To what extent do you agree/disagree that personal safety equipment for frontline officers is suitable for a diverse modern police force?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	251	263	272	206	101

Question 25 - To what extent do you agree/disagree that a Police Covenant would address wellbeing issues at a national?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	473	336	195	60	31

Question 27 - To what extent do you agree/disagree that safeguards should be put in place to ensure those serving within police are able to quickly access medical care for matters arising as a result of their position?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	908	127	43	9	9

Question 29 - To what extent do you agree/disagree that there needs to be specific mental health provisions for those working in policing?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	841	195	38	12	9

Question 31 - To what extent do you agree/disagree that the private sector has a role in supporting police wellbeing needs?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	338	261	336	74	84

Question 34 - To what extent do you agree/disagree that society already recognises the sacrifices made by the police and their families?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	84	155	187	402	269

Question 37 - To what extent do you agree/disagree that memorials, the honours system, police sector awards and other forms of recognition are important in helping families to feel supported?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	337	321	282	104	48

Question 39 - To what extent do you agree/disagree that the honours/medals available for police (Gallantry awards, Empire awards, Queen's Police Medals, Police Long Service and Good Conduct Medal, Special Constabulary Long Service Medal) appropriately recognise the bravery, service and commitment of those involved in policing?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	188	317	282	199	104

Question 41 - To what extent do you agree/disagree that honours are important in helping families to feel supported?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	259	348	306	116	56

Question 43 - To what extent do you agree/disagree that a Police Covenant could add value in helping families to feel supported?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Responses	402	437	192	30	26





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