



Home Office

HOME OFFICE EVIDENCE TO THE POLICE REMUNERATION REVIEW BODY

2018/19 PAY ROUND

Contents

	Page
I. Executive Summary	4
Summary pay proposals.....	5
II. Context.....	7
The policing environment	7
Police funding.....	7
<i>Police officer pay bill and affordability.....</i>	<i>9</i>
The officer workforce	9
<i>Diversity.....</i>	<i>10</i>
Police workforce transformation	10
<i>Talent Management (including chief officer applications)</i>	<i>13</i>
Other developments	15
<i>Capability dismissal</i>	<i>15</i>
<i>Children and Families Act 2014.....</i>	<i>15</i>
<i>Gender pay gap reporting.....</i>	<i>15</i>
<i>Chief officer annual leave</i>	<i>15</i>
<i>Chief officer pay and benefits packages</i>	<i>16</i>
<i>Chief officer post-service employment.....</i>	<i>16</i>
III. Data provision	18
Published data.....	18
Police Workforce and Pay Census	18
Improving police workforce data.....	18
IV. Pay proposals	20
Basic pay.....	20
Time-limited, targeted payments to address specific recruitment and retention pressures	20
Apprenticeship pay	21
NPCC pay reform proposals.....	21

London Weighting.....	22
Dog Handlers' Allowance	22
Annex A – Economic Context	23
Annex B – Home Secretary's remit letter to PRRB for 2018/19.....	28

I. Executive Summary

1. To meet the changing crime challenge we need a police workforce that is flexible, capable and professional to manage increases in demand in a more productive and efficient way.
2. This is why the Government is driving a workforce reform agenda centred on professionalising and supporting the workforce and increasing productivity by driving up qualifications and skills and improving culture and leadership. This work must be sector designed and led in order to meet operational needs. The Home Office will continue to provide support through the provision of transformation funding, funding for supporting organisations, policy support and legislation.
3. A key element of workforce transformation is to continue to refocus pay to reward competence, development and skills instead of time served in rank. By 2020, we are committed to ending time served progression pay and replacing it with a fairer and more transparent structure, with pay bands based on levels of accountability and risk and the level of competence and skills required for different roles. In 2018/19 the Government is keen to see steps taken which move towards this goal, including consideration of whether a variable pay award this year would be helpful. This timescale will support the rollout of the new Policing Education Qualifications Framework which is expected to make the transition to new entry routes mandatory in 2020.
4. In 2018/19 we expect some key measures to be brought forward to begin the transition process to new structures, aligned to and supporting the wider professionalism agenda. These include:
 - a new pay scale for police officer apprentices;
 - final proposals for interim, time-limited and capped arrangements in advance of new pay structures to give forces more flexibility to reward and incentivise specialist skills where there is an evidenced recruitment and/or retention need;
 - benchmarking of police officer roles and exploration of ways to help recognise the unique contribution officers make and define it in the context of pay and reward.
5. In this year's submission from the National Police Chiefs' Council (NPCC), we expect to see clear milestones set for the transition process, including the elements set out above. This is essential so that the police workforce and taxpayers can have confidence that policing is continuing to move forward in its ambition to be as flexible, capable and professional as it can be.
6. The Government is committed to protecting the public and providing the resources necessary for the police to do their critical work. We have acknowledged that demand on policing is increasing and the latest funding settlement reflects this, including giving Police and Crime Commissioners (PCCs) additional financial flexibility to maintain their funding in real terms. At the same time, we have been clear that the increase in 2018/19 funding to PCCs must be matched by a serious commitment from PCCs and chief constables to reform by improving productivity and efficiency to deliver a better, more transparent service to the public. There is more to do to ensure that forces are making the best use of the resources they have and that they invest in a sustainable future. This includes a continued effort to make workforce transformation a reality.
7. In 2017, the Government adopted a more flexible approach to public sector pay, to address areas of skills shortages and in return for improvements to public sector productivity. However, there is still a need for pay discipline over the coming years to ensure the

affordability of the public services and the sustainability of public sector employment, as set out in the [Chief Secretary to the Treasury's letter to pay review body chairs](#),

8. The economic and fiscal context in which the Police Remuneration Review Body will make their recommendations was set out in detail in the November 2017 Budget. As in previous years, the chapter on the economic context at Annex A summarises points that may be of particular relevance to the pay review process. This should be considered alongside the rest of the evidence when making recommendations.
9. The Government has set out the police funding settlement for 2018/19 and the broad intentions for 2019/20¹. The Minister for Policing and the Fire Service has written to police leaders setting out the settlement, and making clear that they must plan to fund the pay settlement out of the existing funding settlement for 2018/19. The Home Office is clear that no more central funding will be made available.
10. It continues to be the case that there are no immediate concerns about general recruitment and retention in the police workforce: wastage rates remain low at 6% and voluntary resignations still account for less than 2% of the workforce; the rate of retirements remains stable and most officers continue to retire shortly after completing 30 years' service; and it is still widely reported that application rates for police officer jobs are far higher than the number of jobs available. Officers continue to be well paid, compared to other public servants and emergency service workers, and have pensions that are among the best available, which allow them to retire earlier than most. The proportion of frontline officers remains high and workforce diversity continues to increase.
11. As in previous years, police leaders have highlighted some specific difficulties around internal recruitment for some groups of specialist officers. We are encouraged to see that progress has been made over the last year by national policing leads to explore the nature and scope of the problem across forces and we will continue to monitor the situation. We look forward to seeing final proposals this year from chief constables to give more flexibility to chiefs and PCCs who wish to use recruitment and retention payments to address the problem in the short term whilst longer term solutions are being developed.

Summary pay proposals

12. As set out in the Home Secretary's remit letter, attached at Annex B, you have been asked to consider various items for the 2018/19 pay round. As you are aware, this year we are providing a single evidence submission to cover all ranks, including chief officers, whilst reforms of police officer pay structures are being developed².
13. In this context, and taking into account the evidence presented in this document, including the economic context at Annex A, the Police Remuneration Review Body (PRRB) is asked to consider the following for 2018/19:
 - **to consider proposals from NPCC and the Association of Police and Crime Commissioners (APCC) on the level of basic pay, including an assessment of affordability within existing budgets and balanced against the need to maximise efficiency and productivity in forces;**

¹ Police Grant Report 2018 to 2019, 7 February 2018: <https://www.gov.uk/government/publications/police-grants-in-england-and-wales-2018-to-2019>

² Letter to Dr Martin Read, Chair of SSRB, 7 December 2017:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/665611/171207_Nick_Hurd_letter.pdf

- **to consider whether the London Weighting payment and Dog Handler's Allowance should be held flat for 2018/19, pending the NPCC review of the need for and purpose of location allowances and their work to benchmark roles;**
- **to provide views on final proposals from chief constables to introduce additional payments for 'hard-to-fill' posts. As previously stated, any proposal should take into account the elements described in your last report and chief constables and PCCs must also ensure that payments are affordable within existing budgets where forces choose to use them;**
- **to make recommendations on whether NPCC proposals for apprenticeship pay are appropriate and should be implemented in legislation; and**
- **to provide observations on the timetable and plans for wider pay reform submitted by NPCC, including updated commentary on what the Body sees as the major risks to implementation.**

14. The context and rationale for these proposals is set out below.

II. Context

The policing environment

15. The Government has recently conducted a significant programme of engagement with forces. The Minister for Policing and the Fire Service spoke to police leaders in all English and Welsh forces, as well as meeting many frontline officers. The objective was to better understand changing demands on the police, as well as how these can best be managed.
16. It remains true that crime as traditionally measured by the Independent Crime Survey for England and Wales³ – widely regarded as the best long-term measure of the crime people experience – is down by more than a third since 2010 and 70% since its peak in 1995.
17. However, the Home Office also concluded that there have been material changes in the demands on policing since the 2015 Spending Review. Demand on the police from crimes reported to them has grown and shifted to more complex and resource intensive work such as investigating child sexual exploitation and modern slavery. At the same time, the terrorist threat has changed. The 24% growth in recorded crime since 2014/15 comes from more victims having the confidence to come forward and report previously hidden crimes, better recording practices by the police – both of which are to be welcomed – but also includes some concerning increases in violent crime.

Police funding

18. Broadly, the 2015 Spending Review provided for around flat cash funding for PCCs if they maximise precept, while increasing funding for national priorities such as technology and transformation.
19. Following the thorough programme of engagement with forces, the Government listened to the police and recognised the additional demands they face. The funding settlement, alongside the priorities we have identified for improved efficiency and productivity, aim to support the police to manage changing demands. In the police funding settlement, published on 7 January⁴, we announced that we will increase total investment in the police system by up to £450 million year on year in 2018/19.
20. At PCC level, the funding settlement for 2018/19 involves:
 - providing each PCC with the same amount of core Government grant funding in 2018/19 as in 2017/18. This contrasts with the approach in 2016/17 and 2017/18, when grant was reduced as Council Tax precept income increased. This approach (flat cash protection) has also been taken to council tax freeze grants, Local Council Tax Support grant funding to PCCs in England, National and International Capital City grant funding, and police Capital grant to PCCs for 2018/19.
 - Alongside this, we are providing further flexibility to PCCs in England to increase their Band D precept by up to £12 per household in 2018/19 without the need to call a local referendum. These changes to referendum principles give PCCs the flexibility to make the right choices for their local area.

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice#publications>

⁴ Police grant report 2018/19, 7 February 2018: <https://www.gov.uk/government/publications/police-grants-in-england-and-wales-2018-to-2019>

- Overall, this approach will enable an increase in funding to PCCs of up to around £270 million next year. It means that each PCC who uses this flexibility will be able to maintain their funding in real terms based on Office for Budget Responsibility assumptions. This means that each PCC can increase their direct resource funding by at least an estimated 1.6%.
21. The Government is providing funding for counter-terrorism policing with a £50 million (7%) increase in like for like funding when compared to 2017/18. This will enable the counter-terrorism budget to increase to at least £757 million, including £29 million for an uplift in armed policing from the Police Transformation Fund.
22. The Government is continuing to increase investment in national policing priorities by around £130 million in 2018/19 compared to 2017/18. The funding for national police priorities, known as reallocations, will support crucial police reform. In 2018/19, the Government will:
- maintain the size of the Police Transformation Fund at £175 million, which we expect to support an improvement in the leadership and culture of policing, the diversity of its workforce, protection of vulnerable people, cross-force specialist capabilities, exploitation of new technology and how we respond to changing threats.
 - increase funding for police technology to £495 million to support the new Emergency Services Network (ESN), Home Office Biometrics, the National Law Enforcement Data Service and the new national automatic number plate recognition service. These technology programmes will provide the national infrastructure that the police need for the modern communications and data requirements, and will deliver substantial financial savings and productivity gains in future.
 - increase funding to £93 million for the discretionary Police Special Grant contingency fund, which supports forces facing significant and exceptional events which might otherwise place them at significant financial risk (for example, helping forces respond to terrorist attacks).
 - provide broadly the same level of reallocations funding as in 2017/18 for existing Arms Length Bodies.
 - continue to pay our Private Finance Initiative obligations, support police bail reforms, and top up National Crime Agency funding and Regional Organised Crime Unit grants to ensure these are maintained at flat cash, in line with police grant.
23. The engagement process the Home Office ran looked at how the increase in demand could best be managed. It is not possible to simply manage increased demand through additional funding. Therefore, we have been clear that the protection offered by this settlement must be matched by a serious commitment from PCCs and chief constables to reform and improve productivity and efficiency to deliver a better, more transparent service to the public that can meet the demands it faces today and in the future.
24. Over the next year, we expect police leaders to deliver clear and substantial progress on productivity and efficiency, including addressing the concerns raised by Her Majesty's Inspectorate of Constabulary and Fire & Rescue Services (HMICFRS) in their recent Efficiency report⁵. This needs to include substantial commercial savings from a more coordinated, often national, approach to procurement. We also need to take advantage of the opportunities offered by mobile technology to free up more officer time to spend at the

⁵ <https://www.justiceinspectorates.gov.uk/hmicfrs/publications/peel-police-efficiency-2017/>

frontline. We also expect all PCCs to publish more detailed information on reserves. We are now entering into discussions with police leaders to agree milestones against these priorities which need to be achieved over 2018. We will be changing guidance to PCCs to ensure that police officers and the public have access to more detailed information on how PCCs intend to use this public money, and will expect the police to work with us on improving transparency.

25. In order to assist more efficient financial planning, we want to give PCCs and chief constables greater visibility on plans for 2019/20. Our intention is to maintain a broadly flat police grant in 2019/20 and repeat the same precept flexibility to allow PCCs to raise an additional £1 a month of local precept in 2019/20. However this is dependent on the police delivering clear progress against agreed milestones on productivity and efficiency in 2018.

Police officer pay bill and affordability

26. The police officer pay bill for the financial year 2017/18 is around £6.23 billion⁶. This includes employer pension contributions which represent 24.2% of salary costs. National Insurance contributions represent around 11% of salary costs.
27. There is a clear need to move towards a pay system that works more intelligently to understand how officers are working to the best of their capabilities at each level. This will require a renewed effort across all forces, working with the College of Policing, to improve and invest in line management, performance management and engagement with force HR leads and officers at all levels.
28. Workforce transformation should be part and parcel of the further work to be undertaken by forces to improve productivity and efficiency if they are to improve their capability to deal with increases in demand.
29. We expect chief constables and PCCs to set out a clear case for an affordable pay award which moves policing towards reform and transformation, and which represents a fair deal for both officers and taxpayers.

The officer workforce

30. The recruitment and retention of police officers at a national level continues to appear stable and we have seen no evidence of any widespread issues, including around the quality of applicants and entry level recruitment. It is apparent that some forces have experienced difficulties in internal recruitment processes over the last year and NPCC have identified some 'hard to fill' posts and will provide analysis of the nature and scope of the problem in their evidence.
31. Wastage rates continue to vary significantly between forces but overall remain low at 6%. Voluntary resignations still account for less than 2% of the workforce. The rate of retirements remains stable and most officers continue to retire shortly after completing 30 years' service.⁷
32. At the time of writing, we have seen no further evidence to indicate that particular sets of skills and experience are being lost at unexpected career points or at an excessive rate. However, we continue to emphasise the importance of forces having good quality workforce data and analysis, including forecasting for both skills requirements and predicted

⁶ This includes allowances as well as pension and national insurance contributions but excludes overtime.

⁷ <https://www.gov.uk/government/collections/police-workforce-england-and-wales>

retirements. Some forces are already collecting and using this data to set resource requirements but others are less advanced and it is not easy to see the picture at a national level. This will be one of the issues we hope will be start to be addressed through the creation of a Police Workforce Data Strategy (see section IV. Data Provision).

Diversity

33. Police forces that reflect the communities they serve are crucial to tackling crime in a modern diverse society. While the latest workforce figures⁸ show the police workforce is more representative in terms of gender and ethnicity than it has ever been, there is still much more to be done.
34. BME officers remain under-represented particularly at senior ranks, with 3.7% at the rank of chief inspector or above at 31 March 2017 compared with 6.8% at constable rank. The number of BME officers at chief officer rank remains low – there are four - and there are still no BME officers leading forces at chief constable rank.
35. The proportion of those in senior ranks (chief inspector and above) who were women was 24.5%, compared with 31% of women at constable rank. At 31 March 2017 there were 56 female chief officers. At the time of writing, there are three permanent female chief constables in England and Wales and one temporary female chief constable as well as one female Commissioner and two female Assistant Commissioners in the Metropolitan Police Service (MPS).
36. Many forces are currently recruiting officers and it is important that they use equalities legislation, including positive action provisions, to make better progress in terms of recruitment of under-represented groups. However, recruitment is not the only way in which forces can improve equality and diversity. Retention (in the year to March 2017 5.0% of officers leaving the police were BME and 24.8% were female) and progression also play a crucial role, particularly in enabling officers and staff to move into more senior and more specialised ranks and roles.
37. The College has published Positive Action Practical Advice, a document which advises forces on the use of lawful positive action to support the recruitment, retention and progression of officers from under-represented groups. In addition, new entry routes to policing such as Police Now are proving attractive and are increasing the diversity of the police workforce.

Police workforce transformation

38. The Home Office has set the strategic direction for police workforce reform and continues to support police leaders and the College of Policing to develop policing as a profession.
39. With support from the Home Office, the sector will put in place a reform package which will ensure the workforce is agile enough to adapt to changing crime and demand, giving officers the skills to deal with issues such as vulnerability and digital crime and ensuring welfare support is in place to help them meet these challenges. Crucially, reforms also include linking pay to competence rather than time served and establishing the hallmarks of a professional organisation including a code of ethics, body of knowledge, continual professional development, talent management, open modern leadership and education standards underpinning roles and ranks.

⁸ <https://www.gov.uk/government/collections/police-workforce-england-and-wales>

40. NPCC will include more detail of current transformation work in their written evidence, particularly where it will have a bearing on pay and reward, and the intention is not to duplicate that here. However, it may help to outline the Government's priorities for reform in the meantime, including a brief description of some of the work currently in train to deliver them:
41. **Open and accessible entry routes to policing at various levels, attracting the brightest and the best to exciting and varied police careers:**
- The College's **Police Educational Qualifications Framework (PEQF)** will raise the bar for police recruitment as well as recognising the high level at which the existing workforce operates. It will centre on nationally accredited qualifications and the transferable skills required in a modern, agile service ensuring that policing can attract the brightest and best new recruits with a well rounded career offer.
 - **Apprenticeships** are a crucial strand of the PEQF initiative, to provide a fair entry route into policing for those who do not hold a degree. Amendments to legislation were agreed in November and will take effect from 31 January 2018, as published in [Home Office Circular 001/2018](#).
 - The other two new entry routes under the PEQF are for graduates of an **accredited pre-join degree** in policing and for **other degree holders**. When added to the police constable degree apprenticeship these entry routes elevate police recruitment and initial training to graduate level. This recognises that changes in crime now demand officers to be able to apply transferable skills to a range of situations, applying problem-solving strategies and exercising personal judgement to these challenges which is a graduate level skill set.
 - **Direct Entry**. In November 2017 the fourth intake of direct entry superintendents and the second intake of inspectors started their training. Almost two thirds of forces now have direct entry police officers in post and a new campaign was launched in January. The College has agreed to widen access to the qualifications needed for appointment to chief officer ranks below chief constable and commissioner for those from a law enforcement background to enable direct entry.
 - **Police Now** is in its third year and has placed officers with 19 forces, up from seven in 2016. Last year, it published an [impact report](#) which showed that wards with Police Now officers perform better in terms of public confidence in policing.
42. **Assurance of competence in specialist areas to ensure policing can respond to changing crime patterns and protect the most vulnerable:**
- The introduction of a **Licence to Practise** in high risk/harm areas will ensure that only those who have developed their skills to the necessary standard and kept up their continuous professional development will be placed in those roles. The scheme will be supported by regulations due to be laid in November 2018 and will be administered by the College of Policing.
43. **An agreed approach to, and definition of, professionalism in all areas of policing, providing clarity on the behaviours, standards and skills expected in all ranks and roles:**
- The College of Policing is developing a new **Police Professional Framework**. This police-led proposal, one of the first to receive funding from the Police Transformation Fund, will lead to a national structure that clearly sets out behaviours and standards expected for all ranks and roles, taking into account the more advanced skills now

needed to effectively manage vulnerability and complex high-harm crimes, from call handler to chief officer.

44. **A culture that recognises and rewards skills and qualifications of its people across all ranks and levels, and can link competence to pay:**

- **PEQF** is again a key driver. It will provide formal recognition of the high level at which the existing workforce operates, with transferable qualifications available for officers and staff.
- The College will design and support opportunities for **professional development** to ensure professional expertise and leadership are rewarded and recognised. The College has embarked on a pilot programme with eight forces, placing **Advanced Practitioners** in emergency response, public protection, vulnerability, local community policing, investigation and technology.
- CC Francis Habgood continues to build on his work to **refocus pay to reward competence, development and skills** instead of time served. We expect the new framework to provide incentives for continuing professional development and the acquisition of specific skills, and to give weight to lateral career progression options. It will also give forces greater flexibility to choose the composition of their workforce.

45. **Effective and consistent systems for officers and staff who require welfare support, ensuring the proper services are in place to address needs:**

- In July 2017, the Home Secretary awarded £7.5 million from the Police Transformation Fund over three years to pilot and, if it is successful, fund a dedicated **national service to help provide enhanced welfare support**. The new service will complement the support already delivered at force level to serving police officers and staff.
- Wider sector-led activity supports the wellbeing agenda and this project. For example, the **Blue Light Wellbeing Framework** is sector-specific, and police leaders are supported by the resources on the website **Oscar Kilo** (overseen by Chief Constable Andy Rhodes, the National Police Chiefs Council Lead on Wellbeing). **Mind's Blue Light Programme** has been funded until 2019 after they were awarded an additional £1.5 million by the Government in LIBOR funding to continue to deliver mental health support.
- **The Home Office supports Chris Bryant MP's Private Members' Bill on assaults on emergency workers**. The Bill supports our clear message that we will not tolerate attacks on emergency service workers and ensure those who are violent face the full force of the law. It proceeds to Report Stage in April.
- On 17 January, the Minister for Policing and the Fire Service held a **roundtable on police wellbeing**, focused on how the government can assist police chiefs in their statutory duty to manage the welfare of their officers. It was attended by police leaders, including Chief Constable Andy Rhodes, as well as experts from across government, Public Health England, and mental health charities.

46. **Increased focus and pace on improving diversity in the workforce, ensuring it reflects the communities it serves:**

- Upon the publication of the **Government's Race Disparity Audit** on 10 October, the Home Secretary wrote to PCCs urging action. She chaired a Race Disparity Audit roundtable in November 2017 to talk about disparities across areas including the diversity of the police workforce and stop and search.

- The Police Superintendents' Association of England and Wales (PSAEW), in partnership with the College, is delivering **coaching and mentoring training** to 700 senior leaders. The expectation is that through this positive action initiative each leader will mentor three junior officers from under-represented groups to support career development and progression.
 - By the time this evidence is submitted, CC Ian Hopkins, the NPCC lead on diversity, will have presented a **draft workforce representation plan** to Chief Constables' Council with a view to publishing in the spring. This plan will seek buy-in to five key principles crucial to the diversity agenda: chief officer leadership; a gold group approach to the diversity challenge; overhauling processes; engaging communities and scrutinising data.
 - Six forces, led by the MPS, are **piloting a new assessment centre for police recruits**, which is designed to reduce disproportionate outcomes for candidates from under-represented groups. This is a recommendation of the College of Policing's review of initial police recruitment.
47. In last year's evidence, we signalled the importance of getting existing measures right in order to be able to implement more radical changes in future. This remains the case, particularly around embedding meaningful performance management systems in forces and improving line management skills.
48. We also emphasised the prime importance that should be placed on ensuring that officers at all levels are engaged with the workforce transformation programme, including pay reforms, and would add to this the need to better engage HR professionals in forces. All partners, including the Home Office, are very aware of the challenge associated with engaging the whole of policing in such a large programme of reform. We welcome the progress that partners have made on this front since last year.
49. At the time of writing, the College and NPCC are in the process of finalising a workforce transformation narrative which describes how all the different strands of reform fit together and which will be used as a the basis for future communications with the sector. The document, which includes a helpful timetable showing the sequencing of work, will be provided in the NPCC's evidence.
50. The College has engaged with chiefs collectively and individually and has consulted with forces on each phase of the programme. HR and training professionals are also being engaged to ensure a collective understanding of the programme. The College has established an implementation working group to respond to forces' issues. It is also drafting transitional guidance and has recently recruited a team of implementation managers to support forces.
51. NPCC have also conducted a programme of focus groups on pay and reward with a range of officers in different forces and have presented at various policing events, forums and professional groups.

Talent Management

52. As part of the Leadership Review, the College has sharpened policing's focus on talent management, which HMICFRS reports have shown to be lacking in many forces. This includes the fast track programme, introduced alongside direct entry, which develops talented constables and promotes them to inspector within three years, subject to satisfactory performance at the promotion processes. The College is re-designing the senior leader programme which is aimed at chief inspectors and superintendents who are aiming

for chief officer ranks. Last year, the College announced it would develop proposals for a national hub to help develop and select senior talented police officers for chief officer roles.

53. The College has invested significant time and resources into improving the flow of talent and diversity into the police leadership cadre. This has included reviewing the Strategic Command Course, the gold standard police leadership course without which officers cannot progress to the chief officer ranks. Targeted work with under-represented officers and staff and key revisions to the application process and support to candidates are yielding results, following poor performance in previous years. Further details are set out below.

Chief Officer Applications

54. In the 12 months to December 2017 there were seven chief constable appointments. Of these, six were the serving deputy chief constable in the same force. Of the six, two have served in another force at chief officer rank.

55. Inadequate competition for chief officer roles (both chief constable appointments managed by PCCs and assistant chief constable/deputy chief constable appointments managed by chief constables) is an ongoing concern. When the College has provided support to PCCs who are recruiting, their input resulted in more applications being generated.

56. We strongly support the College's work to broaden the pool from which chief officers can be drawn. It carried out work to understand the reasons behind low applications for some chief officer roles and in February 2017 published the results of a survey of chief officers and PCCs⁹ as well as potential applicants from ranks below chief officer. The main barriers to applying were identified as:

- Domestic circumstances – the impact a promotion may have on time spent away from family and on partners and children.
- Financial impact – including pension and tax, and specifically the lack of advice and information to assist understanding of consequences in this area.
- Force/organisational – considerations relating to the 'fit' with a recruiting force's culture and values, profile, location, existing team and PCC.
- Location – and impacts associated with changes in cost of living and disruption through a requirement to relocate.
- Selection process – concerns around transparency and fairness of current selection processes, including perceptions of favoured internal candidates.

57. To address issues raised in the survey, the College announced it would set out proposals for a national hub to help develop and select police leaders. When the College has provided support to PCCs who are recruiting, it has been able to generate more applications. In terms of retention, there is no evidence at this time of an increase in the numbers of chief officers leaving the service prior to pensionable service or age.

58. The College is also reviewing the Senior Police National Assessment Centre (PNAC) and the Strategic Command Course (SCC). As part of the first phase of the review, the College implemented a revised application form which allowed chiefs to recommend officers who still required development to meet all of the criteria for PNAC and the SCC. The College also ran positive action development events to encourage those from under-represented groups to apply to PNAC. This appears to have already yielded some positive results, as the 2018 intake of the SCC is one of the most diverse ever. Of the 31 officers taking part in the course, ten (32%) are women and three (10%) are from an ethnic minority background,

⁹ http://www.college.police.uk/News/College-news/Pages/Chief_officer_survey_results.aspx

which is far more representative than the pool from which they are being drawn (23% and 5% respectively)¹⁰.

59. The College has just closed its consultation on the second phase of the PNAC and SCC review. This included proposals on a more modular approach to the SCC, with different entry points, and how to open up PNAC to those from other law enforcement agencies so they can be eligible to be appointed as chief officers.
60. The College is developing role profiles for chief officer posts, including the chief constable of a “single employer model” where the PCC takes on responsibility for fire. It has consulted on the police chief constable role profile and is working with fire service leaders to develop role profiles for chief fire officers. These will then be used as a basis to develop a combined post and will be used to inform entry qualifications.

Other developments

Capability dismissal

61. We have drafted a set of new regulations to allow the dismissal of officers who are medically unfit for officer roles, but who do not meet the strict permanent disablement criteria for ill health retirement. We have invited partners to engage with this process via a Police Advisory Board Working Group prior to producing a final draft set of regulations for formal consultation.

Children and Families Act 2014

62. In line with wider labour market reforms, the Government remains committed to reflecting provisions of the Children and Families Act 2014 for police officers, in particular those sections relating to arrangements for shared parental leave and adoption leave. We are finalising a draft of the necessary amendments to Police Regulations and determinations in February and will begin consultation with partners shortly.

Gender pay gap reporting

63. Last year, the Government introduced new measures to extend gender pay gap reporting beyond private and voluntary sector employers to include the public sector, including the police workforce. Regulations came into force on 31 March 2017, requiring all forces to publish their own gender pay reports online by 30 March 2018. To date, we understand that only a few forces have published data but we expect all forces to comply with the March deadline.

Chief officer annual leave

64. All chief officers who have completed ten years’ service currently receive *‘not less than 48 days’* annual leave under the Police Regulations 2003. It is up to PCCs to set the amount as they see fit. In addition, chief officers receive 1.5 monthly ‘leave’ days but have no allocated rest days. The Senior Salaries Review Body (SSRB) has highlighted the fact that the lack of a cap and differing interpretations of additional ‘leave’ days was leading to inconsistent practice across forces.

¹⁰ Figures from the College of Policing.

65. We welcome last year's agreement between PCCs, chief constables, and the Chief Police Officers' Staff Association (CPOSA) to propose new provisions to allow chief officers 35 days' annual leave, in addition to eight rest days a month as standard. The Home Office is now taking forward measures to implement the new arrangements through changes to secondary legislation and will consult partners on the changes in due course.

Chief officer pay and benefits packages

66. In 2016, CPOSA submitted in their evidence to SSRB a survey of chief officers which appeared to show that some chief officers had received allowances 'outside the national agreement'. 'Allowances' cannot be paid except as provided for in the Regulations or determinations themselves, or as approved by the Home Secretary. Responsibility for ensuring that chief officer benefits are legally compliant and set at an appropriate level sits with the PCC. In addition, Police and Crime Panels are under a duty to review or scrutinise all of the decisions or actions of the PCC, and make reports or recommendations. In his 2011 Review¹¹, Sir Thomas Winsor commented that any benefits provided must be connected with the duties of the chief officer in question and should be justified by reference to the needs of the police force and the protection and efficiency of the officer in question. He therefore recommended that all benefits should be published in order to demonstrate that they were justified as described above. The Home Office continues to endorse this recommendation.

67. Links to forces' published accounts, containing information on chief officer pay, were previously hosted on the College of Policing's website. In November 2017, we published links to all force remuneration data, along with links to chief officer expenses, gifts and hospitality and business interests in one place on [Police.uk](https://www.police.uk). The information published here gives the public a clear picture of chief officer pay and remuneration in one accessible place. It includes a comparative snapshot of chief officer remuneration from 2015/16 and links to each force's website showing current data on pay, rewards packages, gifts, hospitality and outside interests.

Chief officer post-service employment

68. Recommendation 80 of the Leveson Inquiry into the Culture, Practices and Ethics of the Press proposed that consideration be given to whether limits should be placed on the nature of any post-service employment of chief officers within or by the media. There was previously no mechanism to collect relevant information showing post-service employment for chief officers, so there was no means of highlighting possible integrity concerns.

69. In November 2017, we announced a new system which is modelled on the well-established Civil Service Business Appointment Rules and requires chief officers to provide notification of any post-service employment for a period of 12 months after leaving the police service. It covers all types of post-service employment or appointment, not just those in the media. The system went live from 1 January 2018.

70. Departing chief constables now have to notify their PCC/local policing body (for ranks below chief constable they will notify their chief constable) who will make a recommendation. A review of a recommendation can be requested and will be undertaken by a panel with independent representation.

¹¹ [The Independent Review of Police Officer and Staff Remuneration and Conditions: 2011](#)

71. We have worked with CPOSA, NPCC, Association of Police and Crime Chief Executives (APACE) and APCC to develop a toolkit to assist forces and local policing bodies to implement the new system.
72. We expect chief constables who take up post from the start of 2018 to have the requirement to notify as part of their contract, and for serving chief officers to do this on a voluntary basis.

III. Data provision

Published data

73. Published police workforce data is available [here](#).
74. The Home Office have also published updated [force-by-force diversity profiles](#) on the number of BME and female officers in all 43 police forces on police.uk. These diversity profiles allow the public to directly compare the diversity of their police force with the population it serves.
75. As described above, more information about the chief officer pay and benefits package is available [here](#).

Police Workforce and Pay Census

76. The number of police officers at each pay point by rank and the numbers receiving allowances and overtime as at the end of March 2017 have been provided to the pay review body secretariat separately through the annual Police Workforce Census. This data is not currently published but we hope to do so in future.
77. The Home Office has again engaged police practitioners through the delivery of workshops last year with the aim of driving up the quality of census and workforce data returns and resolving issues around completion. We also ensured that we maintained a close level of contact with all forces throughout the data collection process and that support and advice was readily available.
78. We are grateful to payroll and HR staff in forces for their contribution to the process and for working hard to overcome data and IT issues. However, we are disappointed that three forces were unable to send any data at all: Suffolk, Norfolk and Gwent.
79. We will continue to work with all forces this year to ensure that we identify issues early on and offer assistance to resolve them as soon as possible. We will also continue to seek ways to promote the census and to drive up the quality of data. This year, for the first time, we have been able to provide forces with a tailored highlight report, summarising the pay data they have provided and how this compares with other forces. This includes data on officer demographics, total pay, basic pay, overtime and allowances. We hope that this will raise awareness of the census dataset at senior levels and make forces aware of the benefits.

Improving police workforce data

80. We continue to work with partners to improve the quality of workforce data in general and to ensure that the right data is being collected at a national level. To this end, we initiated a national working group last year to discuss the development of a National Workforce Data Strategy. Membership comprises NPCC, APCC, Home Office, the Police Federation of England and Wales (PFEW), PSAEW, CPOSA, the PRRB secretariat, HMICFRS and the College of Policing.
81. The group has met twice so far and further meetings will be scheduled quarterly. The meetings will be chaired in future by NPCC. The Home Office will continue to participate actively in this group and are committed to improving police workforce data. In particular, we

want to improve the quality of existing collections and reduce the burden on forces, and to explore with partners how best to establish a set of national data on police officer wellbeing and engagement.

IV. Pay proposals

82. The Government's public sector pay policy aims to ensure that the overall package for public sector workers is fair to them and that we can deliver world class public services which are affordable within the public finances and fair to taxpayers as a whole.
83. The across-the-board 1% public sector pay policy will no longer apply to pay awards for 2018/19. This is due to recognition that in some parts of the public sector, particularly in areas of skills shortage, flexibility to go above the 1% may be required to ensure continued delivery of world class public services, including in return for improvements to public sector productivity.
84. The last Spending Review budgeted for a 1% average increase in basic pay and progression pay awards for specific workforces, and there will still be a need for pay discipline over the coming years, to ensure affordability of the public services and the sustainability of public sector employment.
85. Recognising these factors, we ask PRRB to consider the following pay proposals for 2018/19:

Basic pay

86. **We ask PRRB to consider carefully proposals from NPCC and APCC on the level of basic pay for 2018/19**, including an assessment of affordability within existing budgets and balanced against the need to maximise efficiency and productivity in forces to address increasing demand. Proposals should take into account the current situation in policing with regard to recruitment and retention; also whether a variable pay award is desirable, in order to begin moving towards the end of time-served progression pay in 2020.
87. We look to chief constables and PCCs to provide evidence of the impact of last year's non-consolidated 1% payment to officers at federated and superintending ranks. We expect them to take this into account in their proposals and to reflect on the most appropriate combination of consolidated and non-consolidated elements to the pay award for 2018-19.

Time-limited, targeted payments to address specific recruitment and retention pressures

88. **We ask PRRB to provide views on final proposals from chief constables on measures to address specific recruitment and retention pressures around internal recruitment, particularly in relation to specialist roles.** We understand that this is likely to involve the introduction of additional payments for 'hard-to-fill' posts. As previously stated, any proposal should take into account the elements described in your last report and chief constables and PCCs must also ensure that payments are affordable within existing budgets where forces choose to use them.
89. We acknowledge the difficulties reported by some forces in filling posts which require a particular skill set. In particular, we welcome the work being done by CC Matt Jukes to improve analysis of the nature and scale of the reported shortages of investigators and to form an action plan. It is clear that the issues vary widely across forces, even for a single role, and that therefore, there is unlikely to be a single solution. We are encouraged to see that some forces are already starting to employ different strategies to address the problem and it will be interesting to see how these progress.

90. We have not seen any strong evidence to suggest that pay is the primary factor behind the issue of 'hard-to-fill' posts and we would emphasise the importance of culture and leadership in tackling problems. However, we are aware that some chiefs and PCCs may find it helpful to be able to use additional payments in the short term in areas where it is likely to have a positive effect. In principle, we remain supportive of the development of a solution along these lines, provided that it is well-evidenced and meets the criteria set out in PRRB's last report.
91. We strongly support the development of longer term pay solutions being developed by NPCC as part of a new pay and reward structure linked more strongly to competence, skills and roles.
92. In future, the Licence to Practise framework, which is being developed by the College of Policing, will support and provide ongoing professional development to individuals working in high risk areas, initially focusing on the most vulnerable. The requalification requirement will provide greater reassurances to the public and victims that those who hold a licence to practise continually demonstrate competency in their specialist field and are fully supported to undertake their role.

Apprenticeship pay

93. **We ask PRRB to make recommendations by the end of April on whether NPCC proposals for apprenticeship pay are appropriate and should be implemented in legislation.** New arrangements will need to be put in place in May. As stated in the remit letter, we are expecting sector agreement on linked pay proposals before full written evidence is submitted. NPCC have committed to circulate proposals to partners in good time so that you are able to consider them alongside the main body of written evidence and provide views by the end of April.
94. As described in Section II: 'Context', apprenticeships are a key step towards implementing PEQF. New linked pay arrangements will complete this step and will lead the way for further measures next year to move the service towards a new pay structure based on competence, skills and accountability instead of time served.

NPCC pay reform proposals

95. This Government remains committed to ensuring that police pay structures support a modern, professional and flexible workforce fit for the 21st century. We support the current plans for sector led reforms which will deliver a new and fairer pay structure. This will continue to re-focus reward on competence, skills and levels of accountability instead of time served. Pay structure reform will support the wider programme of police workforce reform and reflect the new emphasis on professional development, including the introduction of new professional standards and qualifications frameworks by the College of Policing.
96. **We ask PRRB to provide observations on the timetable and plans for wider pay reform submitted by NPCC, including updated commentary on what the Body sees as the major risks to implementation.** We expect NPCC's evidence to include a clear set of milestones for implementation of pay reforms.
97. In addition to the proposals on apprenticeship pay and how this will lead to further pay linkage to PEQF in future, we expect to see evidence from NPCC around the benchmarking of police officer roles and exploration of ways to help recognise the unique contribution officers make and define it in the context of pay and reward.

London Weighting

98. At the time of writing, we are not aware of any new evidence about location based payments although a national review is now in progress, led by MPS on behalf of NPCC. Until the outcome of this review is known, we are not able to say whether London Weighting should continue to be linked to any annual increase in pay. We do not consider the historical link to annual pay increases alone to be a valid reason for uprating the payment this year. **We therefore ask PRRB to consider the evidence put forward by partners on whether there is a case for increasing this again in 2018/19 or for waiting until the purpose and effect of the payment has been properly reviewed.**

Dog Handlers' Allowance

99. This allowance has been raised historically in line with the pay award. At the time of writing, we have seen no new evidence from partners to make the case for another increase in 2018/19. We expect that the College's work on professional profiles may help NPCC to determine the appropriate level of pay for this role in future but that this may not be ready in time for the current pay round. As for London Weighting, we do not consider the historical link to annual pay increases alone to be a valid reason for uprating the payment this year. **We ask PRRB to consider evidence put forward by partners on whether there is a case for increasing this again in 2018/19 or leaving it at a flat rate this year pending the introduction of the new pay and reward framework.**

Annex A – Economic Context

EVIDENCE ON THE GENERAL ECONOMIC OUTLOOK

Introduction

1. The economic and fiscal context in which the Pay Review Bodies (PRBs) will make their recommendations was set out in detail in the November 2017 Budget. However, as in previous years, this chapter summarises points that may be of particular relevance to the pay review process, notably the latest Office for Budget Responsibility (OBR) projections for the economy, and recent trends in the labour market, both in the public and the private sector. This should be considered alongside the rest of this Home Office evidence when making recommendations.
2. In 2017 the Government adopted a more flexible approach to public sector pay, to address areas of skills shortages and in return for improvements to public sector productivity. The Government will continue to ensure that the overall package for public sector workers is fair to them and ensures that we can deliver world class public services, while also being affordable within the public finances and fair to taxpayers as a whole. This makes it all the more important that Pay Review Bodies continue to consider affordability, alongside wider economic circumstances, when making their recommendations.

Public Finances

3. As usual, it is important that the PRBs take into account the wider fiscal context when making their recommendations. As set out in the November Budget, the UK economy has demonstrated its resilience. Gross Domestic Product (GDP) has grown continuously for 19 quarters and employment has risen by 3 million since 2010 to a near record high. However, over the last year business investment has been affected by uncertainty, and productivity - the ultimate driver of wage growth - has been subdued. Productivity growth has slowed across all advanced economies since the financial crisis, but it has slowed more in the UK than elsewhere. The OBR has revised down expectations for productivity growth over the forecast period compared to Spring Budget 2017.
4. The government has made significant progress since 2010 in restoring the public finances to health. The deficit has been reduced by three quarters from a post-war high of 9.9% of GDP in 2009-10 to 2.3% in 2016-17, its lowest level since before the financial crisis. Despite these improvements, borrowing and debt remain too high. The OBR forecast debt will peak at 86.5 % of GDP in 2017-18, the highest it has been in 50 years. In order to ensure the UK's economic resilience, improve fiscal sustainability, and lessen the burden on future generations, borrowing needs to be reduced further.
5. The fiscal rules approved by Parliament in January 2017 commit the government to reducing the cyclically-adjusted deficit to below 2% of GDP by 2020-21 and having debt as a share of GDP falling in 2020-21. These rules will guide the UK towards a balanced budget by the middle of the next decade. The OBR forecasts that the government will meet both its fiscal targets, and that borrowing will reach its lowest level since 2001-02 by

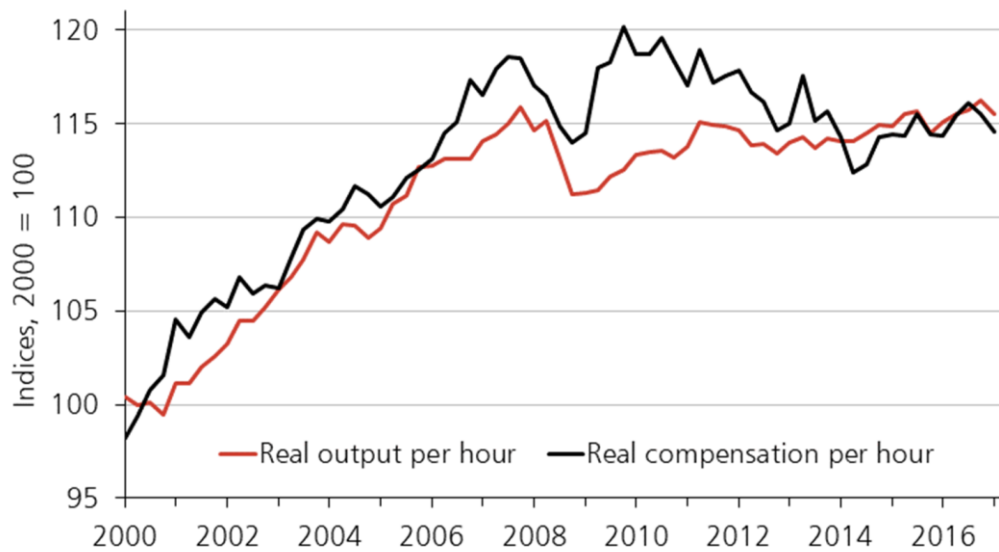
the end of the forecast period. Debt as a share of GDP is forecast to fall next year and in every year of the forecast. These targets will require ongoing discipline in public spending,

6. Public Sector pay currently accounts for around £1 in every £4 spent by the government and the public sector pay bill figure for 2016/17 is £179.41bn, up from £173.19bn in 2015/16. Public sector pay policy necessarily plays an important role in controlling public spending.
7. Departments are also facing longer-term pressures. The OBR's Fiscal Sustainability report highlighted the significant impact that demographic changes are likely to have on the public finances. Discipline in public spending remains central to achieving the government's fiscal targets. The last Spending Review budgeted for one per cent average basic pay awards, in addition to progression pay for specific workforces, and there will still be a need for pay discipline over the coming years to ensure the affordability of the public service and the sustainability of public sector employment.
8. This makes it ever more important to ensure that our pay bill spending delivers maximum value for money. Between 2010 and 2016, public service productivity increased by 3%, an average of 0.5% per year. But although public service productivity has improved, further improvements are vital in order to deliver government objectives and meet rising demand. In its response to the PRBs Government will consider where pay awards can be agreed in return for improvements to public sector productivity, which also plays an important role in the UK's productivity growth overall.

Labour market

9. The UK labour market necessarily forms an important backdrop to the PRB process. The OBR forecast that the number of people in employment will continue to increase to 32.7 million in 2022. The unemployment rate is forecast to increase slightly over the forecast horizon as it returns to the OBR's new estimate of its equilibrium rate, remaining at 4.6% from 2020 onwards.
10. Despite the continued strength of the labour market, weak growth in labour productivity has been weighing down on wages and, ultimately, the public finances. As set out in the November 2017 Economic and Fiscal Outlook, the OBR expects productivity to remain flat in 2017, before increasing 0.9% in 2018 and 1.0% in 2019. Productivity growth is then forecast to increase to 1.3% in later years. This compares to the Spring Budget 2017 forecast of 1.7% on average over the forecast period.

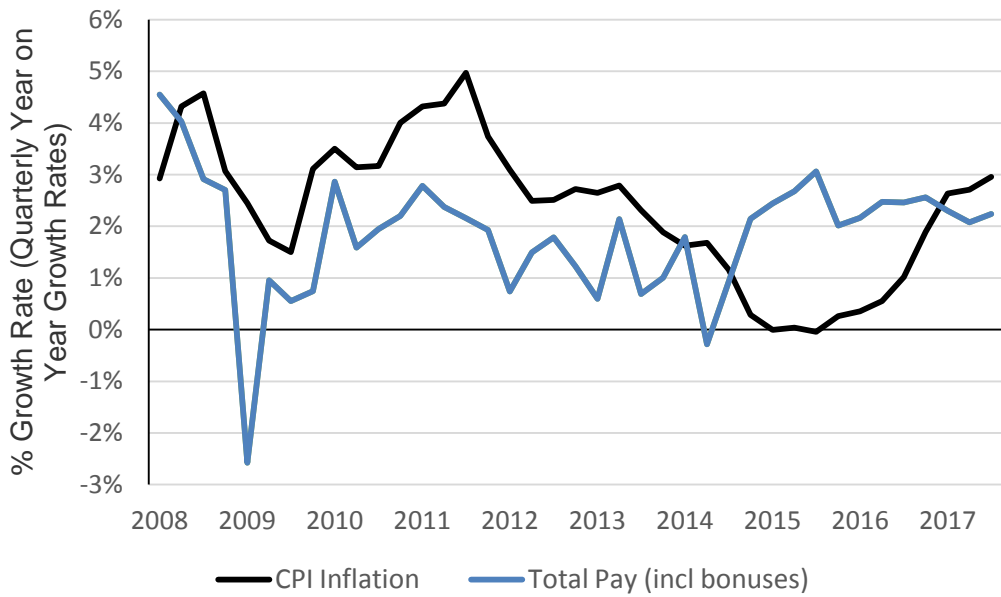
Chart 1: Real output per hour and real compensation per hour, year on year growth (ONS November 2017)



11. With a lower forecast for productivity growth the OBR expects average earnings growth of 2.3% in 2017, 2018 and 2019. It then increases to 2.6% in 2020, 3.0% in 2021 and 3.1% in 2022. A pickup in productivity is vital for the recovery of cross-economy wage growth rates to pre-recession levels. Public and private sector wages tend to move in similar directions, both because of pay expectations and the implications of tax receipts on public sector budgets. The £31 billion National Productivity Investment Fund and our Industrial Strategy will help to boost productivity and earning power throughout the UK.
12. We recognise that higher inflation is putting pressure on all households as well as our hardworking public servants. But historically the relationship between pay and inflation has been a weak one, in part due to the temporary nature of many inflation fluctuations. Most forecasters expect this period of above target inflation to be temporary, as inflation has been pushed above the target by the boost to import prices that had resulted from the past depreciation of sterling¹². The OBR and the Bank of England both expect inflation to peak at the end of this year and then fall again over 2018 and 2019. The appropriate level of public sector pay award is complex and determined by a variety of factors, notably retention and recruitment. Rates of price inflation are important, but not the only consideration.

¹² Monetary Policy Summary and minutes of the Monetary Policy Committee meeting 13 December 2017

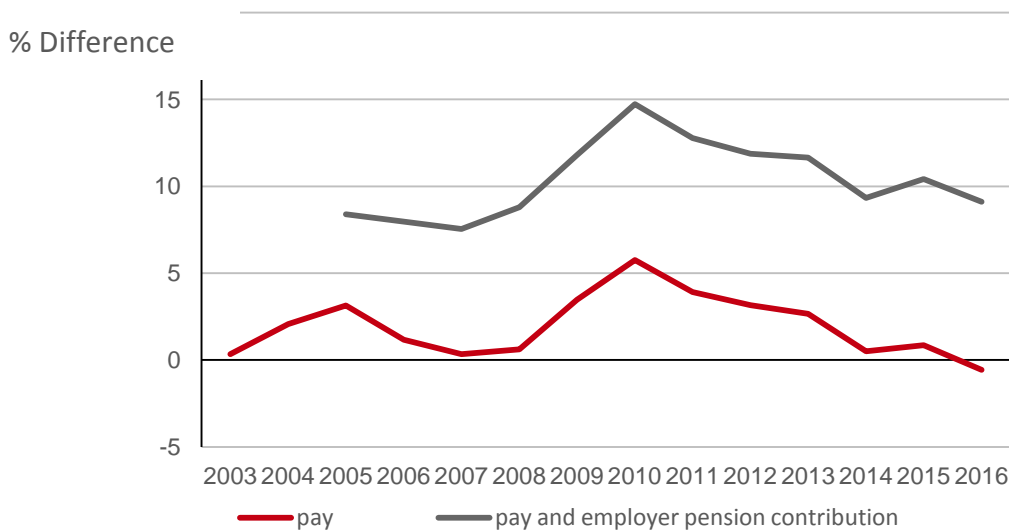
Chart 2: Whole economy average earnings growth and inflation (ONS November 2017)



Public sector pay and pensions

13. Specific evidence on the pay of police officers is presented elsewhere in this document. However, wider trends in pay and remuneration are also relevant. Following the last recession, public sector wages did not undergo the sharp fall seen in the private sector, and have since grown at a slower pace than private sector wages: for the three months to October 2017 private sector total pay grew by 2.7% on the same period the previous year, compared to 1.8% in the public sector (excluding financial services). However, the overall remuneration of public sector employees when taking employer pension contributions into account remains at a significant premium, as seen in Chart 3 below.

Chart 3: Percentage public sector pay premium, hourly pay for all employees, controlling for personal characteristics (ONS ASHE)



14. When considering changes to remuneration, PRBs should take account of the total reward package. Public service pension schemes continue to be amongst the best available and significantly above the average value of pension provision in the private sector. Around 17% of active occupational pensions scheme membership in the private sector is in defined benefit (DB) schemes, with the vast majority in defined contribution (DC) schemes. In contrast, over 95% of active members in the public sector are in DB arrangements.
15. In April 2016, the National Living Wage was introduced at £7.20 for workers aged 25 and over (increased to £7.50 an hour in April 2017, and will increase to £7.83 in April 2018). The introduction of the NLW marked an increase in pay for over a million workers across the UK labour market, including in the public sector. Estimates indicate that approximately 53,000 public sector workers were paid the NLW in 2017. In 2018-19, 1.2 million people on low incomes across the economy will have been taken out of income tax altogether (compared to 2015-16), and a typical taxpayer will pay £1,075 less income tax, compared to 2010-11. Overall, since 2015, we have cut income tax for 31 million people, while freezing fuel and alcohol duty.

Conclusion

16. This chapter summarises the economic and fiscal evidence which is likely to be relevant to the recommendations of the PRBs. This is intended to inform their usual consideration of the affordability of specific pay awards, on top of the workforce specific evidence presented elsewhere in this document.
17. Much of the evidence presented here will feed into retention and recruitment across public sector workforces. Retention and recruitment will vary considerably across geographies, specialisms and grades, where public sector workers face different labour market structures. We would welcome specific comment and analysis from the PRBs on any trends and how pay systems could help address these issues.

Annex B – Home Secretary’s remit letter to PRRB for the 2018/19 pay round



Home Secretary

2 Marsham Street
London SW1P 4DF
www.gov.uk/home-office

Mr D Lebrecht
Chair
Police Remuneration Review Body
Office of Manpower Economics
Fleetbank House
2-6 Salisbury Square
London EC4Y 8JX

7 December 2017

Dear David

Police Remuneration Review Body Remit 2018/19

I am writing to ask you to conduct the annual review of police officer pay. In order to promote consistency as we move towards a new pay structure, this year I would ask that this includes chief police officers. This will ensure a consistent approach is taken across all ranks during the transition to a new framework.

The Chief Secretary to the Treasury wrote to you in September setting out the Government’s overall approach to pay. That letter confirmed that the Government has adopted a more flexible approach to public sector pay, to address any areas of skills shortages and in return for improvements to public sector productivity. The last Spending Review budgeted for one per cent average basic pay awards, in addition to progression pay for specific workforces, and there will still be a need for pay discipline over the coming years to ensure the affordability of the public service and the sustainability of public sector employment; review bodies should continue to consider affordability when making their recommendations.

For this pay round, I see PRRB continuing to play a key role in reviewing the next stage of NPCC’s plans for a new reward structure work and providing observations on the first tranche of proposals put forward by NPCC, who will provide the bulk of the evidence this year.

In light of this, I refer to the PRRB the following matters for recommendation for 2018/19:

1. how to apply the pay award for 2018/19 for police officers of all ranks, including chief officers, in accordance with the Chief Secretary's letter and in the context of how it will support overarching NPCC proposals and timetable for a new pay structure;
2. NPCC proposals for police officer apprenticeship pay, which will need to be considered outside of the usual reporting timetable - as you are aware, apprenticeships will be introduced in forces next year and we are expecting sector agreement on linked pay proposals early in the New Year. NPCC have committed to circulate proposals to partners in good time so that you are able to consider them alongside the main body of written evidence. To allow adequate time for consultation before any changes are applied, it will be important to obtain PRRB's observations by the end of April 2018 in advance of your main report;
3. to review final NPCC proposals for time-limited, targeted payments to address specific recruitment and retention pressures; and
4. to provide observations on NPCC reform proposals, including the timetable.

As in previous years, in considering the appropriate level of pay for police officers I would ask you to have regard to the standing terms of reference as set out in previous remit letters and to consider each matter for recommendation in the context of future reform plans.

Thank you for your continued hard work in this important area and I look forward to receiving your recommendations no later than 31 May 2018.



The Rt Hon Amber Rudd MP