Evidence to the National Crime Agency Remuneration Review Body

NCOA

National Crime Officers Association

The Trade Union of the NCA

PROTECTING THOSE WHO PROTECT THE PUBLIC

Pay Round Aug 2020 – July 2021

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Introduction

Our frustrations in relation to last year's pay review body process were of course well documented. Beyond the process, we remained equally frustrated that Pay Reform had not been extended to include other grades and that the expert Spot Rate had still not been fully tested or embedded at G4 and G5.

That said, at the conclusion of the 2018/2019 pay round we were delighted to see that the NCARRB recommendations reflected a desire to ensure that NCA pay did not lose pace with Policing counterparts. Although the Agency's original submission was far more reserved in its own assessment of what it was seeking in terms of pay, it was subsequently (and very rapidly) able to rely on a single paragraph to secure the recommendations of the review body.

Whilst our pay submission was almost entirely focussed on parity with, and more importantly *gaining ground* on Police pay, we found it refreshing that the recommendations of the independent pay review body were accepted in full and our commitment to this process was vindicated and remains resolute.

As is the case in an Agency governed by two separate pay mechanisms, the NCOA subsequently met the Agency to secure pay awards for the non-powers group. Given the agreement to uplift the shift allowances for officers within the Control Centre we convinced the Agency that it was appropriate to mirror the award for those working in the Operational Support Team. These officers, although 'non-powers', work demanding shifts similar to those in the Control Centre and also with their own acute recruitment and retention issues. The basis for the award was linked to a commitment from the Agency to undertake a wide-ranging shift review involving the NCOA and other interested parties.

This year, following informal engagement with the Agency we were anticipating a non-contentious pay submission, largely due to timescales and one which would not see further movement or expansion of the Spot Rate system at this time. We were therefore surprised, but pleased to see, that the Agency has pressed forward with its previous commitment to introduce Spot Rate structures across the workforce and is seeking to include G3s, G2s and G1s from August this year.

It is worth commenting that we struggle to understand why the Agency *will not* include G6s in any wider reaching Spot Rate structure. This in our opinion will cause disengagement of those who already perceive themselves to be an undervalued element of the workforce, whose responsibilities often belie their work title or grade.

In contrast to G4s and G5s who are already subject to Spot Rates, *if* the NCARRB make recommendations in support of the Agency's case, G3s who move to Spot Rates will lose any right to overtime. This subject will be covered in greater detail, but it is important to stress to both our members and members of the review body that at no point has the NCA consulted with us in relation to what are clearly money saving plans. More accurately I suspect, they are simply an 'increased efficiency' deal, to secure enhanced pay (i.e. Spot rates) for this group of managers.

We were made aware that this would form part of the Agency's submission just before Christmas – albeit on an embargoed basis. Recognising this was likely to be a highly emotive issue for those affected, I sent a formal letter to the Agency on the 20th December 2019 asking that in the interests of transparency with its staff they declare their intentions ahead of the written submission date of 24th January 2020. Although that date was

subsequently changed on the 20th January in favour of the 7th February, this request was declined.

The Agency has often struggled to recruit the right calibre of staff (at all grades), largely due to the disparity with Police pay. Previous efforts to resolve this by permitting what turned out to be indiscreet personal contract negotiations, caused a great deal of unrest amongst the existing workforce.

In April however, it took the bold step to make the NCA a more competitive and attractive employer; by offering those who had passed an internal G2 to G1 campaign a 10% uplift, as opposed to the 5% promotion award detailed within existing policy.

The NCOA value the work that these particular candidates have delivered for the Agency and chose not to oppose this move away from policy – on the proviso that the Agency acted quickly to implement a minimum 10% promotion pay uplift across all grades, not just senior managers. I am therefore delighted to report that this was presented to the Remuneration Committee in due course and was signed off just prior to Christmas 2019.

Whilst this actually mirrors pay increase percentages (on promotion) for many other civil service departments, I hope this gives an indication for the future of how the Agency might take advantage of all positive pay options open to it, not simply those controlled by a pay review body process.

Simon Boon – General Secretary

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SECTION 1

NCOA Pay Recommendations 2020-2021

1.1. This submission provides evidence on the work of our members, across all grades and the issues they face as employees of the NCA. In approaching what is now the 6th submission to the National Crime Agency Remuneration Review Body (NCARRB), we do so comfortable in the knowledge that all parties are cognisant of the unique role and legal restrictions placed on NCA officers with powers.

1.2. Unlike the most recent pay round, the Agency has assured us that their submission will be focussed on those with powers. Previously they have presented a more rounded picture of pay for all employees to enable the review body to make decisions with an awareness of matters which, whilst beyond their remit, may be impacted by their recommendations.

1.3. For many years the Agency has attempted to support a workforce with insufficient pay resources which is borne out in the results of consistent staff surveys. Attrition rates in almost all business areas have continued to be cause for concern.

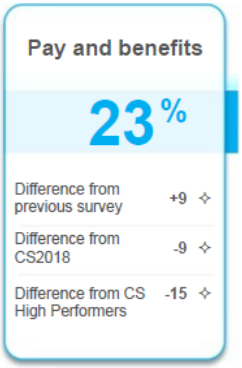
1.4. Last year, following the implementation of 'Pay Reform' to deal with recruitment and retention issues, the Agency saw its attrition rate rise to 9.3%. Critically, in the Civil Service People Survey which immediately followed this period of pay re-structure, the NCA was placed 121st of the entire 145 contributing Civil Service Groups when responding to satisfaction with pay.

1.5. We provided evidence to the Agency from our own analysis of the survey, seeking to act collaboratively to improve the NCA's poor positioning in the Civil Service 'league table'.

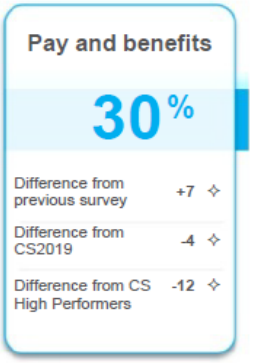
1.6. Recent 2019 survey results (**Appendix D**) have shown an uplift in scoring since 2018 which reflects the work carried out by the NCOA in targeting the ten least satisfied work groups alongside the Agency's strategic 'Top Ten' fixes.

1.7. In relation to Pay, noting the 7% increased survey response rate, the Agency has moved up 7% since last year's lows (**Appendix C**):

2018
Returns - 3028
Response Rate - 61%



2019
Returns – 3290
Response Rate – 68%



1.8. We do not yet have access to more detailed data to see where the Agency now sits in the Civil Service People Survey 'League Table', but remain hopeful that further upward movement is reflected when assessed against Civil Service peers.

1.9. Whilst the Agency, NCARRB, and the NCOA are in agreement that the closest comparator group for the purposes of pay sits with the Police, there are no equivalent surveys in which the NCA takes part in order to assess where it sits with this more closely aligned law enforcement group.

1.10. That said, there remains a problem in that the top tier of the UK's law enforcement community, still does not have pay parity with its general policing peers. It would be fair to say that NCA staff satisfaction with pay is likely to be lower than that of policing peers.

1.11. Our recommendations for the period 2020 - 2021 are based on a number of key factors:

- Inflation.
- Pay comparators with Police.
- Low levels of pay satisfaction within the NCA.
- Recruitment and retention issues affecting the Agency.

1.12. Whilst none of these factors are driven by affordability per se, we would urge the Agency to seek what it needs to deliver an effective operating model *and* resolve recruitment and retention issues as opposed to developing a pay structure which is merely affordable from within existing budgets.

1.13. Our members *do* place a value on being prevented in law from undertaking strike action; therefore we, like them, expect that the annual pay award should take this into account.

Recommendation 1
Minimum 5% Consolidated Pay award to all staff.
Rationale: Recruitment and retention issues. Inflation affecting officers over a number of years. Comparator disparities.

Recommendation 2
Pay range maxima to reflect 5% increase.
Rationale: Recruitment and retention issues. Inflation affecting officers over a number of years. Comparator disparities. Failure to increase maxima will further compound the pay gulf with Police. This hinders both the recruitment of experienced staff and the retention of experienced NCA staff.

Recommendation 3
Minimum 5% uplift to NCA London Weighting values for 2020-2021
Rationale: Recruitment and retention issues. Inflation affecting officers. Comparator disparities.

Recommendation 4
NCA shift pay allowance to increase to 30%
Rationale: Findings of the NCA's own Independent Shift Review. Acute recruitment and retention issues Comparator disparities.

Recommendation 5
No removal of overtime at G3 without consultation
Rationale: No evidence to support this. No review of G3 overtime has taken place No consultation with the recognised Trade Unions has taken place.

Recommendation 6
Agency to introduce G6 Spot Rate Structure
Rationale: No evidence why G6 grade cannot be subject to a Spot Rate structure. Harmonise pay structure of the Agency. Equal opportunities for pay progression across all grades.

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SECTION 2

Spot Rates - G4 & G5

2.1. When the principles of Spot Rates were first introduced to the NCA workforce in March 2018, they targeted G4 and G5 officers placed within specific Intelligence and Operational roles.

2.2. It was the roles themselves which were designated as eligible for 'Spot Rates' and when officers were able to provide evidence of competence in such roles, or working towards professional qualifications (IPP & PIP2), they were offered the opportunity to move to Spot Rate pay.

2.3. The take-up saw only a modest shift away from the standard pay range for two main reasons:

- The associated increase to the working week.
- For many un-promoted officers with long standing law enforcement careers, the move to Spot Rate pay represented a pay drop.

2.4. Recognising also that a few departments faced recruitment and/or retention problems which sat apart from the IPP and PIP2 target group, Spot Rate pay in its initial guise has simply been unable to resolve some of the more acute issues faced by the Agency.

2.5. In the past year, a number of business cases have been presented to the Remuneration Committee in order to allow additional work groups access to the Spot Rate pay system.

2.6. At the same time, several business cases have also been submitted for Recruitment and Retention Allowances (RRAs) which sit separately from the Spot Rate structure and are subject to Annual Review.

2.7. Whilst we are widely supportive of additional funding resources for our members, we have witnessed cases where (due to the incompatibility with Spot Rates) successful Spot Rate bids have seen the removal of existing RRAs. This has of course had a negative impact on staff for whom Spot Rates are not financially viable (see 2.3), yet RRAs are no longer available to them.

2.8. This crudely demonstrates how the Agency has a number of recruitment and retention issues which are not satisfactorily resolved using the existing 'recently revised' pay structure. It also begs the question -

If there is a continuing need for Recruitment & Retention Allowances to 'plug holes' in various business areas, why doesn't the NCA cite this a principal reason for additional pay resources within the Annual Pay Review Process?

2.9. It is an example of how we believe the Agency bases its pay case on what is affordable as opposed to what it needs, in terms of consolidated pay resources to enable it to better retain its staff.

2.10. Although the past 12 months have seen small additions to the original Spot Rate pay

group, the associated Skills Matrix is unable to respond to the increasing demand for inclusion. The recent, but long overdue decision to carry out a comprehensive review of the Skills Matrix is welcome, and
will provide the Agency with greater flexibility to draw in new work areas.

2.11. What we have not seen since the introduction of Spot Rates is anything other than modest movement into the 'Expert' Spot Rate zone. Whilst many saw this as an achievable target for skills, competence and more importantly pay, this simply has not happened.

2.12. As the 2018/2019 pay process was drawing to a close, the Agency was moving under a degree of pressure, to trial an 'Expert' pay group for officers within the Armed Operations Unit (AOU). Whilst we welcome this first group it is astonishing that as part of a pay strategy designed over 2 years ago that the Expert Spot Rate is not available or attainable by all officers working in the Spot Rate structure.

2.13. Of course, the inclusion of the Armed Operations Unit officers highlights merely what we already knew: That they are experts in their field, skilled professionals operating at the high end of both organisational *and* personal risk.

2.14. Whilst it is of course appropriate that the AOU should be afforded access to the Expert level of Spot Rate pay, the Spot Rate structure was introduced to deliver a progressive pay system based on skills and competence within designated roles. The AOU is merely one group within a large complement of such designated Agency roles.

2.15. It is significant that we never envisaged that Expert Spot Rate levels would only apply to a group of officers with niche skills (such as the AOU); more that the skills matrix and the ability to move up the Spot Rates was intended to read across all Spot Rate roles.

2.16. The NCOA and our members therefore expect to see significant use of the Expert level across all roles rather than limiting its use to the AOU and other specialist teams within the NCA workforce.

SECTION 3

Spot Rates G6, G3, G2 & G1

3.1. In a surprising but welcome move, (contrary to its early positioning for this pay round), the Agency seeks to introduce Spot Rate pay across the remaining grades – with the notable exception of grade 6.

3.2. The NCARRB will be aware that for several years the NCOA have been pushing the Agency to focus clearly on the G6 group. These officers may deliver a largely support grade function, but their exposure to operational work and intelligence data often does not reflect their grade nor their critical importance within the NCA.

3.3. Recognising this, we have expressed our concern in the face of both poor recruitment and retention, that the Agency should be more inclusive in its 'One NCA' ethos by;

- Properly valuing the contribution these officers make.
- Creating career pathways to enable G6 officers to move up the Grades.

3.4. Since the development of Pay Reform, whilst the Agency has focussed on G4s and G5s in the first instance, our engagement with the employer gave us confidence that there was cognisance of the pay framework problems associated at G6, as well as general support for developing the G6 pay framework in a manner consistent with colleagues at other grades.

3.5. Although there has been a compression of the G6 pay scale with a significant boost at the bottom, this is not unique; merely mirroring activity across all grades.

3.6. NCARRB members will recall that last year we spoke of acute recruitment issues at G6 where, in at least one notable case, a vacancy failed to secure a single applicant. We had hoped that this would form the catalyst for a concerted push to improve and make these roles more attractive financially, recognising the entire Agency wide grade/pay structure.

3.7. It appears our fears for this grade were well founded. The total headcount within the Agency in September 2018 was as follows:

Table 1*

September 2018	Powers		No Powers		Total
	F	M	F	M	
NCA Grade 1					86
NCA Grade 2	12	74	59	90	235
NCA Grade 3	48	252	128	211	639
NCA Grade 4	144	425	325	354	1248
NCA Grade 5	284	587	632	668	2171
NCA Grade 6					351
Total	491	1366	1392	1481	4730

*Data provided by the NCA December 2019 reflecting total headcount, which includes secondees and contractors.

3.8. Following a period of intense recruitment and associated 'growth', the same data at September 2019 is as follows:

Table 2*

September 2019	Powers		No Powers		Total
	F	M	F	M	
NCA Grade 1					**90**
NCA Grade 2	13	67	59	101	**240**
NCA Grade 3	47	256	146	221	**670**
NCA Grade 4	158	451	346	387	**1342**
NCA Grade 5	292	599	736	638	**2265**
NCA Grade 6					**301**
Total	**517**	**1398**	**1502**	**1491**	**4908**

*Data provided by the NCA December 2019 reflecting total headcount, which includes an additional 110 secondees and contractors since 2018.

3.9. Is a support grade cadre of 300 for an Agency with almost 5000 members of staff what the NCA have been seeking to achieve? If not, then positive action needs to be taken now to turn the tide. Without doing so quickly, the very groups recognised and rewarded through the first phase of Pay Reform at G5 and G4 will find themselves affected by a diminishing G6 support structure.

To see the G6 figures drop by 50 employees in just one year (a 15% loss) surely cannot reflect the Agency's public intentions for growth?

3.10. Within the Home Office Affairs Select Committee (HASC) response from the Agency dated 1st April 2014, the G6 head count in October 2013 was 372 against a workforce of 4474 (including 10 Specials), or 8% of the workforce. Compare that with just over 6% in 2019.

3.11. Investigators and Intelligence Officers in particular, have law enforcement skills which are not mirrored by the entire workforce. It is therefore extremely useful and an appropriate use of resources to allow them to focus on activity utilising these skills. There is however also a great deal of peripheral work which they generate daily.

3.12. Whilst this work may be equally important to the development or presentation of a case, it is not necessary that it be conducted by those with bespoke IPP2 and PIP2 skills.

3.13. Without a healthy G6 structure within the Agency, investigators and intelligence officers in particular may find themselves increasingly unavailable to apply their 'in demand' capabilities, given additional administrative responsibilities.

3.14. Moving to the more senior grades we are pleased to see that the Agency now intends to introduce a Spot Rate structure for grades 3, 2 & 1. The Agency has chosen not to interact with us in developing this - in contrast to previous activity around the G5 and G4 groups.

3.15. We have not seen the associated Skills Matrix for each grade, nor whether movement between the top and bottom of the Spot Rates is achievable or merely aspirational as per the misleading Expert rates at G5 and G4. We therefore anticipate that the terms of this

additional element of the Spot Rate structure will be driven by affordability rather than strategic needs or requirements.

3.16. There is an expectation that any achievable movement within the Spot Rates for these officers, mirrors existing principles for Police pay parity experienced by the G5/4 Spot Rate group i.e. minimum of 80% of Police pay. Increases beyond those experienced by more junior grades would raise questions in terms of fairness and rationale.

3.17. Early information provided by the Agency indicates that of those who are likely to be in scope:

- 94% of Grade 1's offered Spot Rates, are deemed *likely* to accept them.
- 97% of Grade 2's offered Spot Rates, are deemed *likely* to accept them.
- 76% of Grade 3's offered Spot Rates, are deemed *likely* to accept them.

3.18. Given the generally low acceptance rates of G4 and G5 officers offered Spot Rates, we note the extremely high predicted figures for those offered Spot Rates at higher grades. Whilst we are aware a number of these officers will have been promoted within the Agency since 2013 and sit at the bottom of Grade, we would seek assurance that the principles of fairness at 3.16 are evidenced.

3.19. What may turn out to be a fantastic pay rise for a very small group of the workforce may simply re-ignite the bitterness felt when Spot Rates divided not only powers and non-powers officers but also officers *with* Police powers, who are not operating in Spot Rate roles.

3.20. Noting the Agency's rationale to create further alignment with Police pay we are surprised to see that the Agency's proposals only reflect part of the Police pay structure for Inspecting ranks. Although the inability to earn overtime at these ranks is well documented and embedded into Police pay, so is the London pay differential.

3.21. Historically, Police Forces set pay locally although this has almost entirely disappeared over many years. There is one notable exception to this which relates to the pay of Police Inspectors and Chief Inspectors.

3.22. From the Desborough Committee review of 1919 through to the present day, there have been a number of reports commissioned to look at the pay and conditions of Police officers. In spite of all of these reviews, a London pay scale still exists for the Inspecting ranks who earn considerably more than their peers within provincial Police forces.

3.23. This enhanced rate of pay is entirely separate from individual London allowances which are paid *in addition to* the London premia.

3.24. Within the NCA there are 488 Grade 3s, of which approximately 40% are currently in receipt of the LWA. The Agency has informed us that of the 134 G3 officers 'in scope' for Spot Rates, approximately 50% are currently in receipt of London Weighting Allowance (LWA).

3.25. If the Agency wants to deliver closer alignment with Police pay at G3, then it should not 'cherry pick' simply on the grounds of immediate affordability. A side by side comparison with the National Police pay structure at this grade is only accurate with the inclusion of the London wage group.

3.26. Given the impact this new introduction will inevitably bring, we are frustrated at the Agency's non-existent overt information on the matter, despite consistent critical staff survey data on poor communication and the management of change. We have seen nothing which

sets out to improve the morale of those ‘out of scope’ nor how the Agency decided who was ‘in’ and who was ‘out’.

3.27. There have been two major reviews of Police Pay and conditions, the first being the Sheehy Inquiry which was established in July 1992 and reported its findings the following year. Then in 2012, the Winsor report saw the introduction of further reform across the Police Service. Both these reports took place prior to the formation of the NCA.

3.28. In 2006 as SOCA was formed and in 2013 as this organisation morphed into the National Crime Agency, there was ample opportunity to adopt a number of pay reform measures recommended or implemented by these inquiries – the respective Agencies chose not to.

3.29. The formation of the NCA also represented a clear opportunity to resolve legacy pay issues dating back to 2006. Despite warnings of what lay ahead, the Agency did nothing.

3.30. Although the financial climate at the start of both Agencies was far more positive than the years that followed, it would be implausible that the NCA had not at least considered some of the more radical recommendations from both reports to realise cash savings on pay. Therefore, an assumption can be made that both organisations saw no merit in reducing the terms and conditions to mirror negative changes to Police pay - despite two distinct opportunities to do so.

3.31. The Sheehy report was extremely detailed and subject to intense examination and strong criticism from within the Policing community. However, at the point of publication a change of government saw a change of focus and subsequently many of the recommendations were never implemented. That said, in September 1994 one of the most controversial changes - the removal of overtime payments for Police Inspectors (and Chief Inspectors) became embedded within Police terms and conditions.

3.32. Following an agreement reached with the Police Federation of England and Wales, an overtime ‘buy-out’ took place which added £3250 to consolidated pay (pensionable pay). In turn, this removed any entitlement to overtime. The same sum was awarded to officers irrespective of role or Force. i.e. Devon & Cornwall Inspectors received the same amount as those in Greater Manchester Police.

3.33. Although the pensionable payment was meant to compensate for the removal of overtime, the whole issue was extremely controversial with little support given, so that many officers affected by this felt that the compensation package failed to recognise the differences in:

- Uniform & CID roles
- Pressures and workloads of those in Metropolitan City Forces and significantly smaller County Forces.

3.34. The Police Federation themselves came under heavy criticism for allowing the introduction of what many considered to be ‘insufficient compensation’ in lieu of overtime.

3.35. Significantly, Home Office Circular 21/97 gave clear guidance on the subject of working time for Inspectors and Chief Inspectors stating:

‘*the changes to conditions for members of the ranks of Inspector and Chief Inspector introduced with effect from 01 September 1994 should not have altered, nor were they intended to alter, the average hours worked each week in posts filled by members of those ranks’*.

3.36. Inflation would see that compensation figure of £3250 worth £6513[1] in 2019.

3.37. The relevance of referencing Sheehy changes to Police terms and conditions (removal of overtime for Inspecting ranks in particular) and the Winsor report, becomes clear when looking at the National Crime Agency's radical proposals to remove overtime for G3 officers who choose to adopt Spot Rates.

3.38. These proposals may turn out be welcomed by some, but will inevitably be as controversial as when introduced into Police terms and conditions in 1994. The NCA also has an additional element for further division in that they will only be offered to a limited group within the G3 pool.

3.39. The proposals have been drawn up without any consultation or involvement of the NCOA. We have not seen any business case which forms the basis for these proposals and therefore ask what has changed since 2013 when the Agency had an ideal opportunity to remove overtime for G3s as the NCA opened for business as a new employer?

3.40. Having seen no evidence to support the removal of overtime for these officers deemed in scope for Spot Rates, we form the opinion that nothing has fundamentally changed to warrant its removal. We do of course note the contents of the Home Secretary's remit letter to the NCARRB (**Appendix A**), in particular, point 3:

'3. Evidence of the Agency's improvements to productivity and workforce efficiencies'

3.41. We understand that at the very least, the 'essence' of the remit letter is formed with the guidance and approval of the Agency itself. With this knowledge -

How can we not reasonably form the opinion that the Agency has already agreed with Treasury to move this group of officers onto an enhanced Spot Rate pay scale? In exchange they will ensure that their entitlement to overtime will be removed. In addition, these officers will also be required to work a 40hr week.

3.42. In contrast, the Police remit letter (**Appendix B**) provides no instruction or guidance on improvements to efficiency *or* productivity.

3.43. The position of the NCARRB mirrors our own on the imposition of a 40hr week - at any grade. Without supporting evidence to the contrary we remain of the opinion that this merely degrades the value of any transition to Spot Rates. More importantly, whilst the Agency appears to want to mirror Policing terms, this delivers a working week in excess of Police counterparts.

3.44. Before any NCA Grade has overtime removed from what are currently 'contractual entitlements', we need to see:

- The Relevant business case.
- Average overtime rates for G3s across the Agency.
- Officers in scope for Spot Rates and rationale for inclusion/exclusion
- Skills Matrix for the G3 group
- Average overtime rates for G3s 'In Scope' for Spot Rates.
- Operating procedures which protect these officers from being overworked simply because they cannot 'earn' overtime payments.

[1] Bank of England Online Inflation calculator

3.45. More importantly, in recognition of the value the Agency allegedly places on its Trade Union relations, it should actively engage and consult with the NCOA prior to announcing such fundamental changes. This will enable us to consult with our extensive membership prior to delivering our mandated position on their behalf.

3.46. An Agency imposed embargo on us telling our G3 members about the proposed overtime buyout prevents us from reporting the full extent of their views at this time.

SECTION 4

Shift Allowances

4.1. In its fifth report (2019), the NCA Remuneration Review Body supported the NCA's proposal to rationalise the payment of the Shift Allowance by revising it from 12.5% to 15% and the corresponding removal of the 2.5% non-consolidated supplement paid to officers in the NCA Control Centre (CC) at that time.

4.2. Subsequent to the publication of the recommendations, officers undertaking shifts in the Control Centre saw their shift allowance change to a 15% consolidated payment. The only other team in the Agency who undertake 'shift working' as defined by the NCA, are the Operational Services Team (OST), based in Leicester.

4.3. As part of the post NCARRB 2019 collective bargaining process for officers without powers, the NCOA convinced the Agency to revise the shift allowance paid to officers in the OST to 15%. For this group of officers, the additional 2.5% remained as a non-consolidated payment.

4.4. In February 2018 during collective bargaining engagement as part of the 2017/18 and 18/19 pay round, the NCA committed to conduct a review of shift working in the Agency. At the same time, the Director of Investigations sought to introduce minimum staffing levels (MSL).

4.5. The MSLs were challenged by the NCOA and the Agency agreed to review minimum staffing levels in line with the review of shifts. Since that time, alongside internal projects within the NCA, (e.g. Enterprise Design Authority work on the NCA Target Operating Model), an independent company, 'Process Evolution', has been supporting the Agency in its resourcing reviews into both the Control Centre and the Operational Services Team.

4.6. Whilst we anticipate the Agency will incorporate the findings of 'Process Evolution' into its own shift allowance recommendations for the Control Centre, it is extremely disappointing, and in some ways incomprehensible, that Senior Management within the OST will not accept similar recommendations for the OST. An impasse has been reached within the Agency on this issue.

4.7. With the NCARRB submission deadline looming, it is apparent that the Agency were left with no other reasonable and transparent option but to treat those in the OST in the same way as officers in the CC. It is recognised that there are slight differences in the work undertaken, shifts worked and pressures of recruitment and retention.

4.8. As we reported in our fourth report to the NCARRB, there has been tardiness in the progress made by the NCA MSL, Shift and On-Call Project Board to provide firm recommendations on behalf of the Agency. The recruitment and retention pressures within the CC in 2017 and 2018 persisted into 2019 and the Agency sought to temporarily resolve these issues by giving officers in the CC a Recruitment and Retention Allowance (RRA).

4.9. Whilst the business case in support of the RRA evidenced the need for a higher payment, affordability and the number of officers within the CC meant that an allowance of only £1800 was subsequently authorised by the Remuneration Committee. This payment was inconsistent with the acute recruitment and retention issues being faced.

4.10. It is our belief that if the CC had been smaller in numbers, staff would have been awarded the maximum RRA as opposed to the minimum.

4.11. In September 2019, the NCA report on the shift allowance recommendations for the Control Centre, made a number of relevant conclusions, particularly having compared NCA allowances versus the levels of allowances within other areas of the Civil Service.

4.12. The factors considered:

- Shift patterns,
- Nature of work performed,
- Grade of work performed,
- Unsocial hours, weekend hours and anti-social hours.

4.13. Although the Agency sought to draw comparison with other Civil Service departments, it concluded that there was no precise 'like for like' team in terms of work carried out or shift patterns, recognising each organisation has a differing requirement. These departments do however all pay a higher rate of shift allowance for staff - in some cases as high as 37%.

4.14. The Agency concluded that the Police Service has a more detailed and understandable frame of reference for shift payments and working unsociable hours. The relevant extract from the Police Staff Council Handbook is pertinent and attached (**Appendix E**).

4.15. The Agency assessed that the Control Centre work the following shift pattern:

- The Control Centre staff work to a 5-week cycle (37hrs x5) = 185hrs every 5 weeks (*NB the roles in the CC and OST are not 'Spot Rate' roles).
- When calculations are concluded on the current shift pattern then '108 hrs every 5 weeks' fall under the definition of 'unsocial hours'.
- This equates to '58.4%' of scheduled working hours as being 'unsocial hours'.
- 68.25 hours (7 shifts) out of each 5-week cycle are full 'night shifts'. This equates to 36.9% of scheduled working hours.
- At present the G3 - G5 staff 'on shift' within the Control Centre all work to this shift pattern. (NB There are no G6 staff)
- Every 5th week, the run of Nights finishes with a night shift which is a Thursday 21:00hrs until Friday 7:00hrs. As the NCA 'day' starts and finishes at 02:00hrs, then the staff are working 5 hours into a Rest Day which is not claimed.
- A like for like policing shift and unsocial hours comparison equates to a 35% shift allowance for the NCA Control Centre and Operational Services Team.

4.16. It is recognised that a move to a shift allowance payment of 30% would be a sizeable financial increase for the Agency, although it is affordable. The payment of a 30% consolidated shift allowance payment would negate the need for a Recruitment and Retention Allowance payment to officers in the Control Centre.

4.17. In August 2019, the Agency conducted a review of NCA on-call arrangements and identified economies of £280,300 by moving a number of specified Agency on-call responsibilities to the Control Centre, in line with an ambition for the CC to be the NCA's Command and Control Hub.

4.18. The following Table represents the Agency's assessment of shift increase costings for the Control Centre:

Table 3

NCA Control Centre - Shift Increase Costings

Current Costs [at 15%]	Grade	Grade Min (£)	15% (£)		Number of Posts	Total Cost (p/grade) (£)	
	G3	43,288	49,781.20		G3	5	248,906.00	Current Costs
	G4	34,971	40,216.65		G4	5	201,083.25	Options
	G5	26,536	30,516.40		G5	35	1,068,074.00	
					Total	45	1,518,063.25	

Shift Allowance [+5%; with Increase 20%]	Grade	Grade Min (£)	20% (£)	Cost increase per post		Number of Posts	Total Cost (p/grade)	Cost increase for All Staff (£)
	G3	43,288	51,945.60	2,164	G3	5	259,728.00	10,822.00
	G4	34,971	41,965.20	1,749	G4	5	209,826.00	8,742.75
	G5	26,536	31,843.20	1,327	G5	35	1,114,512.00	46,438.00
					Total	45	1,584,066.00	**66,002.75**

Shift Allowance [+10%; with Increase = 25%]	Grade	Grade Min	25% (£)	Cost increase per post		Number of Posts	Total Cost (£)	Cost increase for All Staff (£)
	G3	43,288	54,110.00	4,329	G3	5	270,550.00	21,644.00
	G4	34,971	43,713.75	3,497	G4	5	218,568.75	17,485.50
	G5	26,536	33,170.00	2,654	G5	35	1,160,950.00	92,876.00
					Total	45	1,650,068.75	**132,005.50**

Shift Allowance [+15%; with Increase = 30%]	Grade	Grade Min	30% (£)	Cost increase per post		Number of Posts	Total Cost (£)	Cost increase for All Staff (£)
	G3	43,288	56,274.40	6,493	G3	5	281,372.00	32,466.00
	G4	34,971	45,462.30	5,246	G4	5	227,311.50	26,228.25
	G5	26,536	34,496.80	3,980	G5	35	1,207,388.00	139,314.00
					Total	45	1,716,071.50	**198,008.25**

4.19. During the 2020 collective bargaining process, the NCOA seek engagement with the Agency on more widely adopting this ‘building block’ approach to dealing with payments for working unsociable hours. In this way we are confident it will reduce the likelihood of having to deal with these pressures on a yearly basis utilising Recruitment and Retention Allowances.

4.20. We assess that current retention issues in the Targeted Interception team could be more effectively resolved by payment of a consolidated unsocial hours payment, in line with **Appendix E.**

4.21. The Agency has failed to share with staff the findings of its own reports on shift recommendations for the Control Centre. Despite employing Process Evolution to deliver an independent evidence-based assessment on resourcing levels in the Control Centre and Organisational Services Team, it has also failed to share these findings with staff working in those departments.

4.22. It has chosen instead to provide them to the NCOA on an embargoed basis, anticipating that we could represent officers within the affected teams *after* escalating matters in line with the NCA’s own Dispute Resolution Procedure (DRP).

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SECTION 5

Regional Allowances

5.1. Two regional allowances have featured consistently within previous pay review body submissions by the NCOA, a Northern Ireland Allowance (NIA), akin to the Police Service Northern Ireland Transitional Allowance (NITA) and the London Weighting Allowance (LWA) which has been in place since 2006 (SOCA).

5.2. At the conclusion of the 2017/2018 pay review process the NCA committed to engage and consult with us on the introduction of a Northern Ireland Allowance which recognised the unique operating environment for those working in Belfast. That engagement subsequently consisted of us merely being told that the Agency had considered it and would not be introducing any allowance for NI staff.

5.3. Following the implementation of the Paramilitary Crime Task Force (PCTF) which embedded some staff firmly within the NI Policing environment, an allowance linked to this 'Fresh Start' activity was introduced to officers directly attached to the PCTF. Other NI based NCA officers would receive nothing.

5.4. Despite our members carrying out identical roles with common goals alongside PSNI peers, the NCA allowance, although externally funded, was deliberately set by the Agency to be paid at a level lower than the PSNI NITA.

5.5. Since that time the cross pollination of our officers (including those not permanently attached to the PCTF) has 'muddied the waters' for anyone attempting to identify Police officers in the province for the purposes of criminal targeting. In light of this we believe the risk to our members has never been greater.

5.6. That said, we are acutely aware that the Agency will not be influenced to introduce any NIA for all staff without being driven by a security assessment which mirrors or is worse than Military and Police Personnel based in Northern Ireland. Whilst we have not physically seen the latest security threat assessment, we are led to believe that it has not changed from last year.

5.7. We also acknowledge comments made by the NCARRB within their report last year:

'We accept that it is appropriate for the payment of such allowances to be driven by the security assessment. If the level of threat were the same as that for PSNI officers, then NCA officers should receive a comparable allowance. Therefore, we note the current arrangements but invite the NCA to keep these under review.'

5.8. Despite consistently providing factual information about the reality of working as an NCA officer in Northern Ireland, there remains zero support from the Agency to introduce any kind of allowance. It is also clear that the NCARRB are content with the Agency's positioning which should be subject to review.

5.9. Reluctantly but pragmatically, we have therefore decided to provide no further information at this time knowing that without a significant change to the 'official' threat assessment, our efforts would be wasted.

5.10. We would like to point out to all parties who are resistant to the introduction of an NIA, that the pay review body process only takes place once a year. Even with the recent positive restoration of power sharing of the Northern Ireland Assembly, I hope we never reach a point where the Agency supports an allowance merely *following* a serious event involving our members.

5.11. The current geographic distribution of the London Weighting Allowance is not limited to the London postcodes nor even the boundaries of the M25. It reflects historic positioning of a number of sites heavily populated by seconded London Police personnel or the subsequent transitioning of those staff groups to SOCA sites. On the whole, whilst retaining the LWA title, it now crudely reflects the requirement to pay an allowance to those officers working within London itself or those sites in close proximity to London.

5.12. Despite regular indications that the subject will be looked at in greater detail with the intention of introducing a 'regional allowance' which is fit for purpose, there has been no change to the current footprint since 2006. We have consistently provided evidence regarding the current allowances which have evolved within the Policing community beyond the boundaries of the M25.

5.13. Frustratingly, in its 2017 pay submission the Agency informed the NCARRB that it sought no increase to London Weighting for the 2018 to 2019 period:

'***as part of NCA transformation plans and a national rather than London focused strategic future vision, it would undertake a formal review of LWA in 2018/19 to explore the future of qualifying locations and its continuation as a separate pay element.'***

5.14. Recognising this commitment by the Agency, formal recommendation 5 within the fourth report of the pay review body (subsequently ratified) was as follows:

'Recommendation 5. We make no recommendations at this stage as to the London Weighting Allowance for 2018/19, on the understanding that the NCA management will carry out a review of the allowance.'

5.15. With no award determined for LWA at this time, we were keen to be involved in any review. It was extremely disappointing that despite its commitment to do so, the Agency failed to undertake this review which ultimately saw our members miss out on an increased London Weighting award in 2018/2019.

5.16. In its subsequent 2019 submission, the Agency is quoted at 4.35 of the NCARRB 5th report:

'The NCA explained that it planned to move away from a focus on LWA (for recruitment and retention) towards a wider array of reward strategies, which it assessed might be more effective in enabling the Agency to achieve its long-term strategic goals. It told us that there was, however, a need for an enhanced pay mechanism to retain the officers needed in the London area and that the Agency would continue to deploy recruitment and retention allowances to target specialist skills and skills shortages regardless of location.'

5.17. Given this new hurdle to making progress in any review of London weighting (or regional allowance) it is important to understand that the Agency informs us they have no budget for major estate changes. Proposed changes, although aspirational, are now being developed and officers have been informed of possible movement (in a few years' time potentially) to hub sites within home county locations.

5.18. Given that the Agency knows where it would like to be (subject to funding), we remain unclear why it is stalling this long overdue review. Such a review could take into account the strategic ambition of the Agency (in terms of geographic footprint), and therefore be capable of adapting to new buildings as they come into focus or more importantly fruition.

5.19. We concur with the pay review body's assessment within its executive summary (5th report August 2019):

'We are concerned that this review is overdue and sense the frustration of the unions at this further delay. In assessing the uplift to LWA we note the differential between the current level of LWA and the package available to police officers. It is important that this differential does not fall further behind for recruitment and retention reasons and because the police are a competitor and comparator for pay. We consider that the increase in LWA should be linked to our recommendation for basic pay as this also reflects the impact of the cost of living. (Paragraphs 4.39 and 4.40).'

5.20. It is also relevant that the Home Secretary's current remit letter regarding Police pay directs the PRRB as follows:

'This will include a formal recommendation on how to apply the police officer pay award for 2020/21 to all ranks, including chief officers, and ***to include a review of London Weighting*** *and Dog Handler's* ***allowance****.'*

5.21. Given that the NCOA, the NCARRB and the Agency itself all seek to avoid further divergence from Police pay, this knowledge that the Police are to undertake a review of London Weighting should provoke an immediate response from the NCA.

5.22. The NCARRB are aware of our frustration and given that any estates strategy is likely to take several years, we believe the Agency should undertake a London Weighting Allowance review now, without further delay.

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SECTION 6

Effect of capping the pay grade maxima

6.1. In its 2018/2019 submission, the Agency made it clear that any further widening of the gap between NCA and Police pay would negatively impact on its ability to 'realise the benefits of the significant investment in pay' made to date.

6.2. In due course, it moved to improve its initial modest bid to mirror the recommendations of the NCARRB and PRRB. However, it remained rigid in its positioning on the Pay Grade maxima and awarded only 1% to officers sitting at the top of pay grade.

6.3. With notable exceptions, the Agency and SOCA before it, have consistently adopted this unhelpful approach since 2006 which affects the most senior serving officers in grade.

6.4. In turn, a low non-consolidated pay award:

- Affects pension benefits (likely to be highlighted even more given the recent McCloud judgment).
- Delivers a below inflation pay award for those who are likely to be the most experienced officers, within the workforce.
- Demotivates these officers who feel undervalued.

6.5. Unlike the majority of public sector groups, NCA staff do not benefit from any form of time in service pay progression and therefore the only pay award is that secured through the yearly pay review body process.

6.6. Whilst both the Police and the National Crime Agency have been able to secure modest annual awards, the NCA took the decision to the cap the pay band max whilst the Police service has continued to increase all of its pay scales at the time of the annual autumn pay award.

6.7. A new pay scale[2] was introduced for constables (and other ranks) from 1 April 2013 with a starting salary of between £19,000 and £22,000 depending on qualifications, experience and local recruitment needs. The new 'shorter' pay scale meant officers would be able to reach the top point of £36,519 in seven years rather than ten. At the same time, new NCA officers entered the Agency at the bottom of the pay grade and would remain there for the rest of their service, other than through promotion or annual cost of living pay awards.

6.8. This continues to be the case noting that movement to Spot Rates is far less likely than remaining on the 'standard' pay scale.

6.9. The NCA Grade maxima exist largely due to legacy pay arrangements of those joining from the Police arena since 2006. They are wholly unachievable for new staff starting their law enforcement careers in the NCA and merely benchmark employees who are paid the highest in any particular grade.

6.10. Due to the almost simultaneous advent of the NCA and the new Police progression pay scales, it is possible to compare the pay projections of these two separate organisations at the point of joining/promoting in 2013. More importantly it is possible to look at how

[2] Police Pay 2013 - Determinations of the Secretary of State under the Police Regulations 2003. Annex F - Pay

subsequent annual pay awards have altered (or not) the pay range max for both sets of employees.

6.11. This exposes the effect of capping the NCA pay maxima whilst the Police maxima have risen year on year.

Table 4
2013 Police Constable v NCA Pay Projections

Police Constable Joined Oct 2013 Projected Pay Progression	NCA G5 Joined Oct 2013 Projected Pay Progression
0 £19,000	0 £24,717
1 £22,000	1 £24,717
2 £23,000	2 £24,717
3 £24,000	3 £24,717
4 £25,000	4 £24,717
5 £27,000	5 £24,717
6 £31,032	6 £24,717
7 £36,519	7 £24,717

Table 5
2013 Police Sergeant v NCA Pay Projections

Police Sergeant Pay at Oct 2013 and Projected Pay Progression	NCA G4 Joined Oct 2013 Projected Pay Progression
0 £36,885	0 £32,956
1 £38,145	1 £32,956
2 £39,426	2 £32,956
3 £40,226	3 £32,956

Table 6
2013 Inspector v Grade 3

Police Inspector Pay at Oct 2013 and Projected Pay Progression*	Police Inspector (London) Pay at Oct 2013 and Projected Progression*	NCA G3 Pay at Oct 2013 and Projected Pay Progression
0 £47,256	0 £49,329	0 £41,195
1 £48,588	1 £50,664	1 £41,195
2 £49,923	2 £52,005	2 £41,195
3 £51,258	3 £53,346	3 £41,195

*Incremental progression for Inspecting ranks was suspended for two-years from 1 April 2012 to 31 March 2014

Table 7
2013 Chief Inspectors – no agreed comparator with NCA

Police Chief Inspector Pay at October 2013 and Projected Pay Progression*	Police Chief Inspector Pay (London) at October 2013 and Projected Pay Progression*
1 £52,308	1 £54,393
2 £53,358	2 £55,437
3 £54,459	3 £56,541

Table 8
2013 Superintendents v G2

Police Superintendents' Pay at October 2013 and Projected Pay Progression	NCA G2 Pay at October 2013 and Projected Pay Progression
1 £62,922	1 £51,493
2 £65,517	2 £51,493
3 £68,112	3 £51,493
4 £70,716	4 £51,493
5 £73,311	5 £51,493

Table 9
2013 Chief Superintendents v G1

Police Chief Superintendents' Pay at October 2013 and Projected Pay Progression	NCA G1 Pay at October 2013 and Projected Pay Progression
1 £75,138	1 £63,078
2 £77,274	2 £63,078
3 £79,422	3 £63,078

6.12. Although the projected salaries over a number of years favoured those within Policing, they also increased given the annual cost of living pay awards which uplifted each of the progression steps - including the maxima.

6.13. In 2020 the hypothetical Police officers joining or being promoted in late 2013 have all now reached the top of their rank pay grade - unlike their NCA colleagues joining or being promoted at the same time. This has seen Police pay gather increased momentum beyond the NCA pay max, creating a worsening pay position from the start point in 2013.

Table 10
Comparison of Police & NCA Pay Grade Max since 2013

Rank/Grade	2013	Difference with Police Pay + or -	2020	Difference with Police Pay + or -
Constable	£36,519		£40,128	
NCA G5	£36,321	**-£198**	£37,189	**-£2939**
Sergeant	£40,226		£45,099	
NCA G4	£43,240	**+£3014**	£44,247	**-£852**
Inspector	£51,258		£55,767	
Inspector (Lon)	£53,346		£58,038	
NCA G3	£54,050	**+£2792 (London +£704)**	£55,274	**-£493 (London -£2764)**
Superintendent	£73,311		£80,859	
NCA G2	£66,025	**-£7286**	£67,490	**-£13,369**
Chief Supt	£79,422		£89,511	
NCA G1	£80,883	**+£1461**	£82,647	**-£6864**

6.14. It is therefore clear that NCA's flawed strategy continues to widen the gap with Police pay despite its overt commentary to the contrary. Capping the pay max for a prolonged period has also caused a huge impact on existing NCA budgets when self-funding recent pay reform measures in order to bridge the pay gap.

6.15. For too long, officers at the top of pay grade have taken what are effectively pay

cuts, in order to allow the Agency to compensate for those poorly paid at the bottom of grade. Whilst we support the compression of the pay ranges there does not appear to be any recognition that:

- There is actually no mechanism for any officer to progress to the pay range max.
- Those currently sitting at the top of grade are likely to be at the very end (or near to the end) of their law enforcement career, at the point they will be able to access invested pensions - Police Pensions in particular.
- Raising the maxima is likely to only affect this small and diminishing group of officers.

6.16. Whilst supporting the principle of increasing the bottom of the pay scales, we believe the Agency should be more aggressive in substantial low end uplifts without preventing those at the top from what amounts to a standard pay uplift enjoyed by many of their peers for several years. In our opinion capping the max is neither sustainable nor fair.

6.17. To put this into context, last year only 161 officers were ‘blocked’ from receiving more than 1% consolidated pay awards because of the flawed frozen pay maxima strategy.

SECTION 7

Submission Summary

7.1. During last year's pay round we were contacted by the OME in relation to timetabling issues which were well documented at the time. We were invited to consider a joint approach with the Agency to make the decision-making process of the NCARRB a little more straightforward. Unfortunately, at such a late stage in the process, a revised joint submission was not possible given the controlling oversight of the NCA's case.

7.2. At the commencement of the 2020-2021 pay round we reminded the Agency of the previous comments of the OME and invited it to consider working collaboratively to present a pay case on which we could both agree. This was declined, despite the offer being repeated at 'informal' pay talks with the Agency.

7.3. As a consequence, we made it very clear and as early as possible, that we would oppose any pay case presented by the Agency which recommended locking in the pay maxima. Whilst our rationale is clear, it appears that the NCARRB are also uncomfortable at the continued use of this strategy, presenting its clearly targeted Recommendation 1 as follows:

> **Recommendation 1.**
> **a. an overall pay bill uplift of 2.5%;**
> **b. that the pay band minima for Grades 5 and 6 should be uplifted by 4.25% and 4.5% respectively; and**
> **c. that all officers should receive a consolidated pay uplift of at least 1% and the NCA should aim to provide all officers with a minimum consolidated uplift as close as possible to 2%.**

7.4. Within their own pay submission, the Agency had articulated its own awareness of the problems caused by capping the maxima:

> **152. In addition, we recognise the impacts on officer morale at the higher end of the band which is why we have chosen to make one-off non-consolidated payments to underpin a minimum 1% award for this group. We will continue to monitor the effects of not increasing the pay range maxima for the 2020/21 pay round.**
>
> - NCA Annual Submission to NCARRB February 2019

7.5. Unfortunately, the flexibility afforded the NCA when implementing element C of the recommendation, saw those at the grade max receiving a pay award of 1.5% but, it resisted the guidance of the NCARRB by implementing a consolidated pay uplift of 1% - with the balance paid as a one-off lump sum. We have no doubt that given the small numbers involved, a 2% consolidated award was entirely affordable.

7.6. It is evidently clear that the Agency will continue to resist any advice or guidance to change tack. Moreover, it continues to quote its compression strategy as a method of speeding up the ability of officers to move from the bottom to the pay scales:

153. Our approach to pay range compression supports our overall pay strategy to reduce our equal pay risk and reduce overlaps between grades and pay ranges. Shorter pay ranges mitigate equal pay risks by reducing the time it take for officers to catch up with their more highly paid peers.

- NCA Annual Submission to NCARRB February 2019

7.7. This is a flawed argument - there is no mechanism for any officer to progress beyond the point of entry to the standard pay ranges.

7.8. Since 2013 upward movement of the Pay Range Maxima has only taken place due to a consistent rejection of the NCA's strategy. It is therefore disappointing that, once again, that it continues to form part of the Agency's pay case this year.

7.9. It is also interesting that since the introduction of pay reform measures (which were applied in August 2017), barely a quarter of staff receive Spot Rate pay (although approximately half the Agency's roles are eligible for SRs) with only a handful of officers seeing the benefit of 'Expert' rating. Although many officers eagerly moved across to Spot Rates with significant pay landmarks in sight, it has become clear in a very short space of time that the top levels of Spot Rate pay are actually unattainable for the majority.

7.10. Whilst the Agency has reshaped its pay structure in order to improve its organisational and operational capability, it has done so without total autonomy to repair the long-term damage caused by poor pay. Despite a period of intense recruitment to raise numbers, attrition still sits at about 10%[3] (this percentage decreases in Agency reporting which includes data on secondees and contractors).

7.11. Attrition figures continue to increase year on year, and pay is clearly a major contributing factor for this:

Table 11

Relevant Period	% of workforce*	Source
1/10/2014 - 30/09/2015	6.49%**	2016 - 2017 NCA written submission to the NCARRB
1/10/2015 - 30/09/2016	7.86%	NCA Workforce data Nov 2016
1/09/2016 - 30/08/2017	8.36%	2017 - 2018 NCA written submission to the NCARRB
1/09/2017 - 30/08/2018	9.3%	NCA Workforce data Jan 2019
1/9/2018 – 30/08/2019	9.9%	NCA Workforce data Jan 2020

* All data includes those reaching the end of fixed term contracts and contingent labour.
** This *does not* include 173 Voluntary Exit Scheme (VES) leavers.

7.12. We are also aware that over 200 longstanding vacancies within the Investigations Command have caused overtime requirements to rise considerably. With overtime providing a temporary solution, staff are working longer and harder to ensure that the increasing

[3] NCA HR Data obtained under collective bargaining arrangements - Jan 2020.

operational commitments of the Agency are met. We are unsure whether this is currently seen as a priority nor whether the recruitment pipeline is in a position to rectify this staffing shortfall recognising locations versus candidates available, as well as competing demand from elsewhere in the Agency.

7.13. Whilst the Agency has less difficulty recruiting new blood to its ranks, increased attrition tends to confirm that it continues to experience very real retention problems in business areas which require skilled and experienced operatives.

7.14. This year has also seen a noticeable and steady stream of talent moving to Civil Service roles. Whilst pay is clearly an influencing factor, exit data and information from our own members provide us with useful information that officers are also leaving to pursue progression and career opportunities which appear to have eluded them within the Agency.

7.15. As the review body considers the submission of the NCA, it will also be considering the Police pay case which will include NPCC proposals to revise the current Police pay structures. Whilst we are not fully sighted on the direction of travel for Policing peers, we think it highly likely that NCA will present proposals which no longer mirror the emerging Police pay picture. This would inevitably increase the pay gap between these two comparator groups.

7.16. Of course, this becomes even more relevant when remembering that the Home Secretary has also given clear instructions for Police London Weighting payments to be reviewed. Of further significance within the same remit letter:

'The NPCC also intends to set out a proposed timetable for regulatory implementation taking account of requirements for consultation with interested parties.'

7.17. We would welcome a similar approach from the NCA pay group to ensure consultation is meaningful.

7.18. The Agency's proposal to remove overtime entitlements provides us with a timely opportunity to comment that whilst we welcome pay parity with Police peers for all grades, we do not like the continual 'race to the bottom', where the best elements of Police pay and conditions (and Civil Service for that matter) are pushed aside to create bespoke, less favourable NCA structures – pay or otherwise.

7.19. The government have responded in light of the recent McCloud judgement that they will move to ensure no pension scheme members (Police or Civil Service) will suffer detriment when addressing remedy. Given that Police officers are likely to be offered the opportunity to re-join the 'old' pension scheme, this will recreate the previous disincentive which existed when considering mid service transfers to the NCA.

7.20. Although Police officers would quite rightly struggle to rationalise leaving the service for a lower salary and negatively impacting their pension entitlements, the NCA has an opportunity within its grasp to encourage mid service officers from the Inspecting ranks to become NCA officers. Although the introduction of Spot Rates will lift Agency pay scales closer to Inspectors' pay, we suspect this may not be enough in itself. However, were the NCA to leave overtime in place for G3s, this in our opinion would positively influence anyone at this rank considering joining the NCA.

7.21. Unlike previous years, the Agency's pay case appears tightly focussed on the pay of officers with powers. Whilst this precisely fits within the remit of the NCARRB, it sends a confusing message to staff, which will need all parties involved in the process to work

together to dispel.

7.22. That said, despite our active and vocal role in this element of the pay timetabling, it is important to stress that our role is not limited to supporting those with Police powers. Given the close interaction with our members at all grades, (with or without powers) and our knowledge of the day to day running of the NCA, we believe we are uniquely placed to understand the impact of heavily weighted pay reform measures.

7.23. Increasing attrition, which includes many who have not benefitted from Spot Rate pay, along with consistent low morale, must set alarm bells ringing. Whilst the Agency continues to use RRA ‘sticking plasters’ instead of asking for additional funding, it is actually providing clear evidence that it simply does not pay enough to retain staff.

7.24. If the Agency were to also join us in considering fairness as part of its pay submission, it would unlock the maxima and create clear pathways at all grades to permit painless transition to different parts of the business. It should also consider the impact on the majority of its staff rather than just focussing on Spot Rates, which most people have not signed up to, and the bottom of pay scales which should have been tackled long before the recent crisis.

7.25. It is our belief that unless the Agency is able to deliver fairly for all staff, attrition will stabilise, albeit at high levels, but retention problems will merely shift from department to department in response to pay reform which many feel has passed them by.

APPENDIX A

Home Office

Home Secretary

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

BY EMAIL ONLY

Anita Bharucha
NCA Remuneration Review Body
Fleetbank House
2-6 Salisbury Square
London
EC4Y 8AE

04 November 2019

Dear Anita,

NATIONAL CRIME AGENCY REMUNERATION REVIEW BODY REMIT 2020/21

I would first of all like to offer my thanks for the NCARRB's work over the last year. I would now like to ask for your recommendations on the pay award for NCA officers with operational powers in 2020/21.

The NCA is an essential part of the UK's National Security Apparatus, tackling the highest harm crimes in the country including child sexual abuse and exploitation, drugs trafficking and modern slavery.

The NCARRB continues to play an important role in providing an independent view and advising the Government on its approach to pay and, in the case of the NCA specifically, I ask that you consider the pay proposals in the context of the reforms they have achieved to date.

It is through properly targeted pay awards that the NCA has been able to reduce inequalities and implement skills-based pay in the areas where this is most needed, to support the Agency's strategy and transformation programme.

I would, therefore, ask the Review Body to make recommendations for 2020/21 on the application of the pay award for NCA officers with operational powers in either the standard pay ranges, or the Spot Rate pay framework.

The Government has adopted a flexible approach to public sector pay, to address areas of skills shortage and in return for improvements to public sector productivity. The costs of the pay award will be met from within the NCA's existing budgets and affordability envelope. Therefore, in reaching your recommendations for the 2020/21 pay award, I ask that you ensure they are affordable and sustainable. I also request that you describe in your report what steps you have taken to ensure affordability has been given due consideration when reaching your recommendations.

In considering your recommendations, you should have regard to the following:

1. The affordability of any proposals;

2. Evidence of recruitment, retention and vacancy rates within the NCA and its ability to maintain competitiveness with its key comparator markets; and

3. Evidence of the Agency's improvements to productivity and workforce efficiencies.

As the NCA is a Non-Ministerial Department, the Agency will provide you with its own evidence on points 1 to 3 above, based on its workforce assessments and the Review Body's terms of reference. The Home Office will be engaged in this and, where necessary, provide additional information.

As part of the context to its evidence submission, the NCA will set out its operational context, pay strategy and longer-term plans for its workforce, which I expect to be submitted to you in good time.

To allow adequate time for consultation before any changes are applied I would be grateful if you could aim to provide a report on this matter by the end of April 2020.

I look forward to receiving your report.

Rt Hon Priti Patel MP

Home Secretary

APPENDIX B

Home Office

Home Secretary

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

Anita Bharucha (Chair)
Police Remuneration Review Body
Office of Manpower Economics
Fleetbank House
2-6 Salisbury Square
London
EC4Y 8JX

5 November 2019

Dear Anita

POLICE REMUNERATION REVIEW BODY REMIT 2020/21

Thank you for your considerations and recommendations for the 2019/20 Police pay award, which as you will be aware, the Government accepted in full.

I am now writing to ask the Police Remuneration Review Body (PRRB) to conduct its annual review of police officer pay and associated allowances. This will include a formal recommendation on how to apply the police officer pay award for 2020/21 to all ranks, including chief officers, and to include a review of London Weighting and Dog Handler's allowance.

This will be based on available evidence and should be considered in the context of government's recent commitment to an increase of 20,000 officers over three years. This reflects the most significant officer uplift in a decade and reflects the Government's support for a service that we value so highly. I want to empower the service to get the resources and tools it needs to get the job done. I want to make sure that the service encourages the right people to join and remain on the job and that it has a pay system that supports this.

NPCC proposals for a revised pay structure will therefore form a critical part of PRRB's consideration. We therefore ask that the PRRB consider the following proposals, commenting in particular on their suitability and robustness:

- proposals for independent benchmarking, which will have been completed for all officer grades, including Chief Officers;
- defining and valuing the 'P-Factor', recognising those elements of the role which are unique to policing;
- the rationale and proposals for a range of pay interventions to support operational delivery through targeting roles that are hard to fill or critical to retain; and

- wider workforce data which is available to support the uplift of 20,000 officers

You will be aware that the NPCC has been leading the design of police pay reform, implementation for which is now due to begin from spring 2021, to ensure that forces can manage immediate requirements of a growth in their workforce ahead of implementing pay reform proposals. We have asked for their revised proposals to be set out in their evidence submission to the review body. I would welcome your observations on these proposals which will cover the impact of pay reform, consideration of proposed salaries, an assessment of level of force maturity to meet the requirements of proposed assessment points to determine officer pay.

The NPCC also intends to set out a proposed timetable for regulatory implementation taking account of requirements for consultation with interested parties.

The Government must balance the need to ensure fair pay for public sector workers with protecting funding for frontline services and ensuring affordability for taxpayers. We must ensure that the affordability of a pay award is taken into consideration to ensure that police forces are able to maximise the additional officers that they can recruit.

As in previous years, in considering the appropriate level of pay for police officers I would also ask you to have regard to the standing terms of reference for the PRRB and to consider each matter for recommendation in the context of future reform plans. I request the report by 30 April 2020.

Thank you for your hard work in this important area and I look forward to receiving your recommendation and observations.

Yours sincerely,

Rt Hon Priti Patel MP

APPENDIX C

NCA
National Crime Agency

National Crime Agency

Returns : 3,028 Response rate : 61% Civil Service People Survey 2018

✧ Statistically significant difference from comparison

Employee engagement is shaped by experience at work, as measured by nine themes in the survey shown below.

Theme	Score	Difference from previous survey	Difference from CS2018	Difference from CS High Performers
Engagement Index	50%	-3 ✧	-12 ✧	-16 ✧
My work	66%	-2 ✧	-11 ✧	-14 ✧
Organisational objectives and purpose	69%	-6 ✧	-14 ✧	-18 ✧
My manager	60%	-1	-10 ✧	-13 ✧
My team	75%	-1	-6 ✧	-10 ✧
Learning and development	32%	-1	-22 ✧	-27 ✧
Inclusion and fair treatment	67%	-2 ✧	-11 ✧	-14 ✧
Resources and workload	58%	-1	-15 ✧	-18 ✧
Pay and benefits	23%	+9 ✧	-9 ✧	-15 ✧
Leadership and managing change	23%	-3 ✧	-24 ✧	-32 ✧

APPENDIX D

NCA
National Crime Agency

National Crime Agency

Returns : 3,290 Response rate : 68% Civil Service People Survey 2019

✧ Statistically significant difference from comparison

	Engagement Index	My work	Organisational objectives and purpose	My manager	My team
	59%	73%	81%	65%	79%
Difference from previous survey	+9 ✧	+7 ✧	+12 ✧	+5 ✧	+4 ✧
Difference from CS2019	-4 ✧	-5 ✧	-2 ✧	-6 ✧	-3 ✧
Difference from CS High Performers	-8 ✧	-7 ✧	-5 ✧	-9 ✧	-6 ✧

	Learning and development	Inclusion and fair treatment	Resources and workload	Pay and benefits	Leadership and managing change
	43%	74%	63%	30%	38%
Difference from previous survey	+11 ✧	+7 ✧	+5 ✧	+7 ✧	+15 ✧
Difference from CS2019	-12 ✧	-4 ✧	-11 ✧	-4 ✧	-11 ✧
Difference from CS High Performers	-17 ✧	-7 ✧	-14 ✧	-12 ✧	-20 ✧

APPENDIX E

7. Payments for working unsocial or irregular hours

7.3 The following allowances shall be paid to employees working irregular hours (which are defined as **hours before 07:00 or after 18:30**)

7.3.1 An average of at least four but less than eight hours per week, calculated over the working cycle (pro rata to hours worked) **7.5% of salary**

7.3.2 An average of at least eight hours per week, calculated over the working cycle (pro rata to hours worked) **10% of salary**

7.4 The allowance for working irregular hours shall not apply to work which qualifies for allowances at 7.2 or 8.1 or where the employee works those hours voluntarily under a flexible working arrangement.

8. Payments for working shifts

8.1 The allowances set out below shall apply where a shift pattern meets all of the following criteria:

8.1.1 A span of eleven hours or more between start time of the earliest shift and finish time of the latest shift

8.1.2 At least four hours between the starting time of the earliest and latest shifts

8.1.3 At least half of the shifts in the shift cycle include some unsocial Hours

Period covered by shifts	***Proportion of basic pay***
11-14 hours	12.5%
Over 14 and less than 18 hours	14%
18 hours or more	**20%**

8.2 For the purposes of paragraph 8.1, unsocial hours shall be weekends, nights and irregular hours, as defined in 7 above.

11. Separate entitlements and methods of calculation

It is possible for an employee to have a concurrent entitlement to more than one of the payments, but not to night work, shift work or irregular hours at the same time. Where concurrent entitlements exist, each payment should be calculated separately on the basis of the basic salary rate.

APPENDIX F

Summary of Police Pay Scales 2019/20 Constable – Inspector

Allowances

The revised values of allowances from 1 September 2019 are:

Type	Allowance
London Weighting	£2,505 per annum
Dog Handlers' Allowance	£2,340 per annum
On-call Allowance	£20 per day
London Allowance 1 (ii)	£1,011
London Allowance 2 (ii)	£3,327
London Allowance 3 (ii)	£1,000
South East Allowance for Essex, Hertfordshire, Kent, Surrey, and Thames Valley	£3,000
South East Allowance for Bedfordshire, Hampshire, Sussex	£2,000

Motor Vehicle Allowance - Essential Users' Lump Sum	Allowance
451 - 999cc	£846
1000 - 1199cc	£963
1200 - 1450cc	£1,239
Per mile (all users)	HMRC approved rate - £0.45 for tax year 2019/20 for first 10,000 business miles

(ii) Other London allowances may be paid at different rates to officers depending on when they joined the service.

Other useful resources

Head over to metfriendly.org.uk/resources for a host of other information to help you save, invest and protect your police pay.

Contact Metfriendly

Central Court, Knoll Rise, Orpington, BR6 0JA
01689 891454
MetfriendlyUK
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www.metfriendly.org.uk

If you're reading a paper copy of this guide, visit metfriendly.org.uk/police-pay to view this online.

metfriendly — SINCE 1893 — save, invest and protect

Police Pay Scales 2019/20

metfriendly — SINCE 1893 — save, invest and protect

Here is your guide to the police salaries for 2019/20. The tables below contain all information pertaining to police officer pay across the country from 1 September 2019. However, officers based in London or the south of England will need to include allowances as listed in the relevant section.

Constable
(appointed on or after 1 April 2013)

Pay point	Salary
0	£20,880 (i)
1	£24,177
2	£25,269
3	£26,370
4	£27,471
5	£29,670
6	£34,098
7	£40,128

Constable
(appointed before 1 April 2013)

Pay point	Salary
Commencing service	£25,560
Following initial training	£28,527
2	£30,180
3	£32,025
4	£33,036
5	£34,098
6	£37,095
7	£40,128

(i) The salary paid to an officer at pay point 0 shall be between £20,800 and £24,177 as determined by the Chief Officer of Police, after consultation with the local policing body, based on local recruitment needs or the possession of a policing qualification or relevant experience. A new recruit with the Metropolitan Police will start on pay point 1.

Sergeant

Pay point	Salary
1	£41,499
2	£42,894
3	£43,806
4	£45,099

Inspector

Pay point	Salary
0	£51,414
1	£52,863
2	£54,312
3	£55,767

Inspector (London)

Pay point	Salary
0	£53,664
1	£55,119
2	£56,580
3	£58,038

APPENDIX G

Summary of Police Pay Scales 2019/20 Chief Inspector and above

Chief Inspector

Pay point	Salary
1	£56,910
2	£58,050
3	£59,250
In post on or before 31 August 1994	£60,219

Chief Inspector (London)

Pay point	Salary
1	£59,175
2	£60,315
3	£61,509
In post on or before 31 August 1994	£62,469

Superintendent

Promoted to rank on or after 1 April 2014

Pay point	Salary
1	£68,460
2	£72,033
3	£75,795
4	£80,859

Superintendent

Promoted to rank before 1 April 2014

Pay point	Salary
1	£68,460
2	£71,283
3	£74,103
4	£76,932
5	£79,758

Chief Superintendent

Pay point	Salary
1	£84,849
2	£87,717
3	£89,511

Assistant Chief Constables and Commanders

Pay point	Salary
1	£103,023
2	£109,662
3	£116,313

Chief Officers in London

Metropolitan Police Service	Salary
Commissioner	£285,790
Deputy Commissioner	£235,944
Assistant Commissioner	£199,386
Deputy Assistant Commissioner	£152,871

City of London	Salary
Commissioner	£176,802
Assistant Commissioner	£145,830

Chief Officers outside London

Forces	Chief Constable salary	Deputy Chief Constable salary
Greater Manchester, West Midlands	£199,386	£152,871
West Yorkshire	£186,099	£148,878
Thames Valley	£176,130	£145,308
Merseyside, Northumbria	£172,800	£142,566
Hampshire	£169,476	£139,824
Devon & Cornwall, Kent, Lancashire	£166,161	£137,076
Avon & Somerset, Essex, South Wales, South Yorkshire, Sussex	£162,840	£134,343
Nottinghamshire	£156,192	£128,859
Cheshire, Derbyshire, Hertfordshire, Humberside, Leicestershire, Staffordshire, West Mercia	£152,871	£126,111
Norfolk, Surrey	£149,544	£123,375
Bedfordshire, Cambridgeshire, Cleveland, Dorset, Durham, Gwent, North Yorkshire, North Wales, Northamptonshire, Suffolk, Wiltshire	£146,256	£120,633
Cumbria, Dyfed-Powys, Gloucestershire, Lincolnshire, Warwickshire	£142,896	£119,637

A PCC may, on appointing a Chief Constable, set the Chief Constable's salary at a rate up to 10% above or below the rate set out in the table above.

Ready to save, invest or protect?

If you would like to talk to one of our Metfriendly representatives about how to set up a savings, investment or protection plan, visit metfriendly.org.uk/contact-us

For more information on Met and City of London Police Salaries, please contact:

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