

Evidence to the
National Crime
Agency Remuneration
Review Body

- 12th Submission -



NCOA

National Crime **Officers** Association
The Trade Union of the NCA

Pay Round August 2026 - July 2027

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NCOA 12th submission to the NCA Remuneration Review Body.

1. Review of 2025/26

1.1. In its 2024 report the NCA Remuneration Review Body made the following recommendation:

‘The NCA should redesign its job architecture and evaluate all roles to consider which grades and posts are comparable to police officers and which are comparable to civil service, police staff or private sector.’

The Government response was:

‘Partially accepted – while the Home Secretary was supportive of the central premise of the recommendation, measures were already underway to develop a set of comprehensive proposals which the Government would seek to implement in a timely fashion.’

1.2 18 months on from this Government commitment, NCOA members are still outsiders to unrelenting and embargoed ‘*Groundhog Day*’ discussions on NCA Pay Reform which are taking place between the NCA and HM Treasury. The Government commitment to timely implementation of change has not materialised.

1.3 In this 12th submission to the NCARRB, the NCOA reiterates the need for NCA Pay Reform. In the last 10 years, the NCOA has produced and been consistent in recommending a set of proposals which would ensure that NCA pay was fit for purpose, these included:

- Revaluation of NCA pay ranges and working hours at Grades 1-6 in line with appropriate comparators - including police pay.
- Contractual pay progression and appropriate assimilation for currently serving officers.
- Replacement of the current NCA London Weighting Allowance and Southeast Allowance with the NCOA zonal model for geographical allowances.
- Redesign of the whole non-consolidated pay budget so that payments are targeted at NCA’s hard to fill roles.
- A review of NCA International Liaison Officer Allowances.
- A substantial uplift and review of the NCA on-call allowance.

1.4 In our 11th submission to the NCARRB, the NCOA made clear that it felt that the ‘light touch review’ conducted by the NCA in response to the 2024 NCARRB recommendation that, ***‘allowances of NCA officers who are subject to similar risks to Police Service of Northern Ireland (PSNI) officers receiving the same allowance as PSNI officers’***, was insufficient.

Nor do we (NCOA) have confidence that the current NCA pay reform plans will sufficiently consider the implications of an ever-changing threat to our members in Northern Ireland. The NCOA continue to monitor this matter and when required we will escalate specific concerns with the NCA Executive Leadership.

- 1.5** Collateral impacts of the failure to even commence formal engagement on NCA pay reform has resulted in further challenges to the inherent unfairness in the NCA's differentiated pay mechanisms and legacy allowances. In some cases, these have hardly changed in scope since the inception of the NCA. Whilst challenges to the NCA by way of Employment Tribunals rarely get reported overtly owing to the sensitive nature of the roles many NCOA members undertake – they are taking place. These legal challenges are avoidable if the NCA had reformed its pay mechanisms - or accepted that they are inherently unfair and worked collaboratively with the NCOA to resolve this.
- 1.6** In addition, in the last 12 months, the NCOA entered into formal dispute with the NCA over the unfair allocation of recruitment and retention allowance payments to our members who were supporting the work of the NCA Child Sexual Exploitation Referrals Bureau (CSERB). The dispute only ended when the NCA recognised that numerous NCOA members were conducting the same duties as the officers they were 'surged' in to support - and equally entitled to an allowance. This is yet another example of an avoidable escalation of industrial action which would not have taken place had the NCA introduced fairer pay mechanisms and listened to the NCOA when it raises matters of concern.
- 1.7** In what was rare, good news on reform of Pay, the NCA and NCOA worked together and by collective bargaining and delivered changes to the NCA shift pay system. Besides uplifting shift pay for those who work 24/7 (including nights) to a 30% consolidated payment, collectively, we (NCA and NCOA) were able to deliver a new Tier 2 shift payment of 20% in line with the previous recommendations of the NCOA for an unsociable hours allowance.
- 1.8** In a further positive development, it is noticeable that these changes have created a ripple effect with other teams now considering moving to working shifts rather than relying on the expensive use of overtime and on-call to deal with unsociable hours working. Whilst the other NCA TUs were bystanders to engagement on these matters, the NCOA encouraged the NCA to be more creative in how pay can be reformed beyond the strict HM Treasury 'pay flex' rules, especially as discussion on wider Police Reform has gained momentum.
- 1.9** We have also been clear with the NCA that we would not block a reasonable and fair assimilation offer to the decreasing number of officers on the Borders Investigation Allowance (BIA). This allowance should have been an interim measure whilst the NCA bedded in new pay processes. The current BIA acts as a blocker to career development; it is our assessment that favourable outcomes could be reached if officers were appropriately assimilated - with their base pay enhanced by applicable shift allowances.
- 1.10** Whilst the impact of Police Reform on NCA officers has yet to be fully understood, it is unlikely to act as a driver for mid-career Police Officers choosing to move to the NCA without clarity on what their career futures might look like. Unless pay is reformed so that it aligns with comparators, the NCA's stated ambition to recruit mid-career police officers will fail. The NCA already accepts that certain skills cannot be recruited from core labour markets and it

must fill some critical operational gaps using high-cost temporary solutions of overtime (4.25% of its pay bill) and contingent labour (c5% of pay bill). Currently, these temporary measures have transitioned into the norm and remain expensive - as well as masking the true level of recruitment and attrition difficulties which the NCA face.

- 1.11** At this time, and without full understanding of implications of the HM Government white paper on Police Reform, the vacuum in what is known is causing avoidable anxiety for our members who do not know where their long-term futures in law enforcement might take them. As the NCOA have made clear to the Home Office-based Joint Police Reform Team (JPRT), NCA Officers are resilient, with many having gone through the formation of both the Serious and Organised Crime Agency (SOCA) *and* the National Crime Agency. This experience leads them to be justifiably cautious on what the impact of Police Reform will have on their pay, terms, conditions, and pensions.
- 1.12** Our members have been vocal in their support for our position for early engagement, in the knowledge that the NCOA will not allow the mistakes of previous changes to be repeated. In the case of NCA pay, it remains unresolved 13 years later.

2.0 2026/27 Recommendations

- 2.1 In its written evidence to the NCARRB (the NCA report), **NCA officers (both powered and non-powered) should receive a pay award cognisant of the police pay award for 2026 27. This is necessary, in part, to improve the shortfall in officer pay at each grade compared to policing colleagues, due to the lack of pay progression in the NCA. The International Liaison Officer Allowance and Diplomatic Compensation Allowance should also be uplifted by the same percentage.**
- 2.2 Whilst we accept this NCA statement, it only partially reflects the importance of a substantial consolidated cost of living pay award for NCA officers in 2026-27. Overly focussing on recruitment and limiting pay ambitions to this year's award will only maintain the gap between NCA and police pay. At this time, the outcomes of the 2026 Civil Service Staff Survey have yet to be published, although it will be surprising if the NCA results do not mirror the outcomes of the NCOA bespoke Work and Wellbeing survey conducted amongst its members in 2025. We found that 61% of respondents stated that, '*since last year*', their workload had increased significantly and half of NCOA respondents also felt that their workload was now unacceptable. The Agency have accepted the findings of the NCOA survey, which included the startling reality that 76% of respondents confirmed that there were elements of their work which was causing NCOA members to feel low, depressed, stressed, or unwell.
- 2.3 A range of fixes were agreed by the NCA which will hopefully address unacceptable workloads however, they will not deal with the inherent unfairness of NCA pay. Officers' pay currently does not reflect the level or complexity of the important work they undertake. The importance of NCA officers being paid fairly cannot be underestimated, low attrition rates in the NCA do not necessarily indicate that officers are content. Rather, the impact of budgetary constraints across the public sector, which during the spending review period have resulted in several departments ceasing recruitment. This means that many officers have limited options other than continued employment in the NCA.
- 2.4 The constraints placed by HM Treasury in their, '*Economic Evidence to Pay Review Bodies 2026-27 Pay Round*', if followed, could result in a below inflation pay award for NCA Officers. The impact of fiscal drag where frozen tax thresholds are pulling more NCA officers into higher tax bands as their wages rise, would result in many of our members being financially worse off. This could be counterbalanced if NCA Officers (Grades 6 -1) received a larger consolidated uplift and not only an award that is aligned to any Police award. The NCA has produced a comprehensive set of data on the difference between NCA and Police Pay. Analysis shows that the difference between the *achievable* salaries, which for NCA are Spot Rate and Police, pay maxima, range from G5's at 12% and G1's at 26%.
- 2.5 Rather than maintaining this difference, we propose that HM Treasury guidance is ignored and that the NCARBB recommend:

RECOMENDATON 1

NCA Officers (both powered and non-powered) should receive an annual uplift to the standard and spot rate pay ranges at 8%. This is necessary as it would improve the shortfall in officer pay at each grade compared to policing colleagues - which is compounded by the lack of pay progression in the NCA.

- 2.6** The precedent of reformed NCA shift pay delivered by way of collective bargaining which took place outside of the normal pay review body process, was positive and ought to provide confidence to all parties that agreement can be reached between the NCA and NCOA. Continuing to align reform of other allowances to future pay and Contract Reform (PaCR), will be seen as many as just more, ‘kicking the can down the road’ activity by the NCA. Whilst uplifts at or slightly better than cost of living pay awards may marginally improve the take home pay of officers it will not tackle the structural inefficiencies of allowances which were inherited at the formation of SOCA.
- 2.7** In addition to cost-of-living uplifts, we propose that the NCA enter a period of collective bargaining with the NCOA to deliver:

RECOMMENDATION 2

Redesign of NCA allowances including but not exclusively limited to: Location Allowances (LWA and SE Allowance), International Liaison Officer Allowances (including Diplomatic Compensation Allowance), On- call Allowance and Northern Ireland Environmental Allowances.

- 2.8** This wide-ranging review of allowances should also involve a substantive review of the use of the non-consolidated budget. The NCOA have already been clear with the NCA that a review of just Recruitment and Retention Allowances (RRA’s) without understanding the cross over with other non-consolidated allowances including Special Duty Payments (SDP’s), - is a mistake.
- 2.9** The complex way in which the NCA budget is made up, including reliance on high levels of external funding as well as a challenging spending review settlement until mid-2029, creates a dichotomy for the NCA executive. In that, even if HM Treasury support the NCA pay reform proposals whether it will ever be sufficiently attractive for NCOA members to move to a new pay mechanism remains to be seen. By way of example, it seems unlikely that NCOA members would choose a disruption instead of paid overtime in the knowledge that this is likely to be reversed if they moved to the National Police Service.
- 2.10** As we have consistently made clear to the NCA, if it continues to exclude the NCOA from engagement with HM Treasury, any chance of success in a ballot of our members, relies on the NCA being mindful that a change in pay mechanisms needs to be sufficiently attractive to appeal to those on the Standard Pay Range and also those on the Spot Rate mechanisms. Whilst the results of 2025 Staff Survey have yet to be published, if they follow the pattern of the last few years, junior grade officers will report findings of having only a, ‘worm’s eye view’ on how NCA Executive Leaders bring about change. Greater

involvement of the NCOA in all stages of pay reform engagement process might have helped deal with these barriers.

- 2.11** Whilst positive, the 2018 introduction of the Spot Rate pay mechanism following a period of collective bargaining between the NCA and its Trade Unions, it was never going to fully redress all the pay imbalances in NCA pay at that time. The NCA accept that the Introduction of Spot Rate did, ***‘support the retention of specialist officers through matching pay for comparable roles, this approach minimises the risk of officers moving to join the police.’***
- 2.12** The NCA’s current approach to increasing the scope of the Spot Rate pay framework seems disjointed and uncoordinated. There has been an increase of 52 officers moving to spot rates in the last year, it therefore remains an attractive option for NCA officers as well as addressing retention pressures. What is unclear, is why in a period when the number of G2 officers moving to Spot Rate has increased by 13, the number of G4 officers has dropped by 34. We do have significant concerns that that the steady increase of G2’s is a result of upward grade drift rather than a strategic NCA decision to tackling the complexity of serious and organised crime.
- 2.13** Worse still, the G3 Spot rate conundrum has never been properly tackled by the Agency since its chaotic implementation in 2018. G3 Grades remain disadvantaged and have been squeezed out of any financial benefits on offer through Spot Rate pay entitlement. They remain astonishingly underrepresented within the Spot Rate pay group. Currently only 25 G3’s out of 920 are recipients of Spot Rate pay – mostly at the SR1 lower level. NCA stats and reporting within its own submission, highlight the huge inequality of access to Spot Rate pay at G3 level.
- 2.14** For a number of reasons, this is concerning, especially given the fact that a significant number of these G3 operational leaders and Senior Investigating Officers are both managing and reporting to, Spot Rate recipients at all other operational non-SCS grades.
- 2.15** The Agency has no answer, and we see no evidence of any efforts to create equal pay opportunities at this critically important grade which has seen by far the lowest offer and take up.
- 2.16** There remain numerous G4 and G5 officers in specialist roles who are also trapped on the standard pay range although their roles clearly fit within the requirement of Spot Rate roles. The NCA position that the pay imbalances suffered by these officers will be redressed by PaCR is, like numerous other areas of NCA pay – unsustainable.
- 2.17** We have been clear with the NCA that it should immediately offer Spot Rate to a raft of officers in specialist roles at G5 or G4 who are currently on the standard pay range. This interim measure would act to deal with issues of unequal pay whilst our **NCARRB Recommendation 3** takes place. Had the NCA stuck to its commitment to continually review the roles suitable for Spot Rate (SR) and

incrementally increase the allocation of '*Expert spot rate*' to 25% of those on SR, this further pay inequality challenge would have been avoided.

- 2.18 Allowing officers to remain on SR as they move about the NCA would deal with the collateral impact the currently differentiated pay mechanisms have on substantiating silos.
- 2.19 In our 11th submission to the NCARRB, we raised concerns regarding the rate at which G6 roles were being lost from the Agency. In the last 12 months, there has been a further 20% drop in the number of NCA officers at G6. Anecdotally, we have been advised that the NCA are also aware that of this diminishing number of G6 officers, some are now performing G5 roles but not receiving appropriate pay. No doubt the catalyst for this being the stop of recruitment to enabling functions with most NCA recruitment targeted at increasing its operational capacity to tackle organised immigration crime.
- 2.20 In order to reconcile and the tackle concerns of grade imbalance in the NCA and develop a refined pay and grade structure considering the changing workforce composition as the Police Reform agenda develops and the NCA plans its move to the National Police Service we propose that the NCARRB recommend:

RECOMMENDATION 3

The NCA redesigns its job architecture and evaluate all roles to consider which grades and posts are comparable to police officers or police staff.

- 2.21 The NCOA would be active participants in this process, which would be a starting point for collective bargaining on a single redesigned and reformed NCA pay structure.
- 2.22 At the point of finalising our pay case for publication, greater detail has been shared on the future evolution of the NCA and its positioning within a new National Police Service. Given the timescales involved and previous failed promises on Pay Reform, we are concerned that Pay Reform and much needed, significant pay awards, will be abandoned entirely citing a change of tack which now makes the case for PaCR obsolete given the significant changes ahead.
- 2.23 We would however urge the NCARRB to make bold decisions now on NCA pay recognising the reality of the need to start on a level playing field with Policing peers in just a few years' time. Waiting for 5years (or more) before inevitably bridging the pay gap with Police in a single move will result in a more significant financial impact for the Government, be unfair to officers and stand as yet another example of, 'kicking the can down the road', given the landscape ahead.

NCOA Pay & Allowance Proposals 2026-2027

1	NCA Officers (both powered and non-powered) should receive an annual uplift to the standard and spot rate pay ranges at 8%. This is necessary as it would improve the shortfall in officer pay at each grade compared to policing colleagues which is compounded by the lack of pay progression in the NCA.
2	A redesign of NCA allowances including but not exclusively limited to: Location Allowances (LWA and SE Allowance), International Liaison Officer Allowances (including Diplomatic Compensation Allowance), On-call Allowance and Northern Ireland Environmental Allowances.
3	The NCA redesigns its job architecture and re-evaluates all roles to consider which grades and posts are comparable to police officers or police staff.

Observations/notes:



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