

federation focus

APRIL 2011

Winsor report

- the start of the new ice age?

What it means to you

A19 - the moral dilemma



South Wales Police Federation
Member services and Federation views
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CONTENTS

Federation spells out the effects 3

What it means to you 4 - 7

A19 - the moral dilemma 9 - 10

Hutton's report on pensions 11

Focus on regulations 11

Update on Reg A20 13

Protecting minority groups 15

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Contact us:

For general divisional enquiries, please first contact your divisional Federation representative for guidance.

General enquiries can also be addressed by e-mailing the office at generalenquiries@swpf.org

For other matters, please contact:

Richie Jones, Secretary –

rjones@swpf.polfed.org

Danny Ahearn, Deputy Secretary –

dahearn@swpf.polfed.org

(discipline/UPP)

Del Hastings, Treasurer –

delhastings@swpf.polfed.org

(treasurer and financial issues)

Jerry Taylor, Occupational Health Liaison –

jtaylor@swpf.polfed.org

(sickness/pensions)

Howard Casey, Performance and

Misconduct – hcasey@swpf.polfed.org

(discipline /misconduct/UPP)

Kay Prangle, General Manager –

kprangle@swpf.polfed.org

(Flint House/group insurance scheme/ CICA/civil claims)

Wayne Baker, Communications Manager

– wbaker@swpf.polfed.org

(communications, website content and Forum).

More information about the Federation, regulations and latest news items can be found at www.swpf.org

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View from the Chair

The Winsor review into police pay and terms and conditions and the Hutton review into public sector pensions have now been published and, as sad as it is, 2011 may well be recorded as the year when the special covenant between the police and Westminster finally collapsed.

The covenant was initially created to recognise the circumstances under which police officers work and the restrictions placed upon their employment rights. As we have no right to take any form of industrial action, the Government of the day has always recognised the need to be fair when negotiating our terms and conditions.

The Police Negotiating Board (PNB) has facilitated these negotiations over the years and, at least until 2009 when we proffered a vote of no confidence in the then Home Secretary Jacqui Smith, we have been treated fairly - though not always as well as we would have liked!

The financial crisis now means all public sector bodies have to make swingeing cuts and the police are not exempt from that requirement. The Association of Police Authorities (APA) and ACPO have submitted their recommendations to the Winsor review and unfortunately they paint a bleak and ungrateful picture of their respective feelings towards Federated officers.

Although both ACPO and the APA have praised the Winsor report as an opportunity to bring police pay into the 21st century, we can only see it as the most disgraceful and undisguised attack on Federated police officers since the inception of the modern police service.

It is an absolute disgrace that, in the midst of a two-year pay freeze, (which the Federation has accepted without complaint), it is the officers who are relied upon to actually deliver the policing service to the public of South Wales who are being required to pay the heaviest price.



Winsor recommends you should not only have a pay freeze but you should also have your annual increments frozen! This is a double whammy! With the loss of SPP, CRTP and huge reductions in over-time payments, together with serious implications for any payment of public holidays, Winsor has made it clear that he has placed fiscal savings well ahead of policing efficiency. He has certainly offered no consideration whatsoever to the special case that has always been intrinsic to the policing covenant.

We cannot take industrial action and we're being bullied as a result. The Home Secretary will now decide which recommendations should go to the PNB, which will then discuss the issues and seek common ground.

Please be assured that we will contest these recommendations with all at our disposal and will continue to fight for your terms and conditions to be protected.

On top of the Winsor disgrace, we also have to deal with the Hutton review of public sector pensions which recommends you should lose your right to a final salary pension, replacing it instead with a career-average pension, and that you should work to the age of 60 in order to attract a full pension entitlement.

2011 – the start of the new ice age.

Gary Bohun

Chair, South Wales Police Federation

“No winners” from Winsor report

The Police Federation of England and Wales (PFEW) has warned there will be ‘no winners’ if the recommendations in the Winsor Review are implemented.

Tom Winsor delivered the first part of his review to reduce police officers’ pay and conditions of service at the start of March, and proposed the removal of nearly £500 million a year from the police pay bill.

“Despite the Home Office spin that there will be ‘winners and losers’ let me assure you that by removing this amount of money from the police pay bill there will be no winners,” says Ian Rennie, general secretary of the Police Federation.

Now the Home Secretary, Theresa May, has to decide which of the recommendations she accepts before they are then put to the Police Negotiating Board which meets on April 14.

“Clearly the proposals within the Winsor report have the potential to significantly reduce the remuneration that you currently receive for performing your duties,” Ian continues.

“That is why the PFEW will fully engage in the negotiating process at the Police Negotiating Board and will fight to retain the current value of police officers’ terms and conditions of service. I can assure you that we will use every means at our disposal to resist any detrimental changes to officers’ pay and conditions of service.

“These are difficult and challenging times for the police service. Never has there been such an attack on our pay and conditions. Never has it been more important for us to stand together and support each other.

“This is the most important ‘officer requiring assistance’ call you will ever have to respond to as a police officer.

“We will keep you fully informed of any developments, including how you can support our campaign to defend your terms and conditions.”

■ If you have any comments on this article, please email focus@swpf.org

Federation spells out the effects

The Federation has completed a breakdown of some of the headline figures from the Winsor report.

The national Police Federation believes the recommendations within Tom Winsor’s report will remove nearly £500 million a year from the police pay bill. And general secretary Ian Rennie says that by taking this amount of money from the police pay bill there will be no winners.

The recommendations mean:

Basic salaries will be frozen for two years from September 2011. With inflation running at five per cent over two years this would see the value of the average salary fall by more than 10 per cent in real terms.

Winsor’s recommendations will also reduce pensionable pay:

- If you have not reached the top of your payscale, you will be at the same pay point for the next two years - an average loss over two years of £2,345.
- If you are at the top of your scale and you receive Competency Related Threshold Payment (CRTP), which Winsor recommends is scrapped, you will lose £1,212 a year.
- If you have not reached the top of your payscale, the abolition of CRTPs means you have lost the potential to earn that £1,212.
- CRTP makes up your pensionable pay. Its removal means your annual pension when you retire will be more than £800 a year lower if this recommendation is accepted.

On top of these proposals, if you are an officer who falls into one of the following groups, you may see your pay cut by even more:

- If you work ordinary over-time on a regular basis the change to plain time means you will lose an average of £430 a year.
- If the Force requires you to work over-time on rest days with less than five days’ notice you could lose an average of £300 a year.
- If you receive a Special Priority Payment (SPP), you will lose between £500 and £3,000, although some officers could lose more than this.

These figures are based on averages and some officers will receive more than the sums mentioned here, while some will get

less or none at all.

There may be officers who appear to benefit from some of the changes that Winsor has proposed, but it will depend on how the recommendations are implemented.

The introduction of an additional shift premium at first sounds attractive, particularly as he proposes officers should receive an additional 10 per cent of their basic pay. Unfortunately, this is not the shift allowance that he states so many officers have told him they want. It is in fact paid on an hourly basis only for the hours you work outside of 6am and 8pm. As a police officer you can be directed to work at any time but if this proposal is introduced it would result in you suffering a financial detriment if your duties are changed by management to work within these hours.

The introduction of an interim Expertise and Professional Accreditation Allowance, which replaces the current SPP scheme in all but name, will reduce the amount forces currently pay to officers.

The proposed removal of the ‘Hertfordshire Agreement’ that currently remunerates officers who are on ‘Mutual Aid’ or ‘Held in Reserve’ and to replace it with pay only for the hours worked, will significantly reduce the amount of compensation officers receive for being directed to work anywhere in the UK and the subsequent disruption to your family life.

The proposed change to allow payment at double time if required to work on Christmas Day and seven days chosen by the officer is in effect a reduction by stealth in your pay for working public holidays. Given that all officers will not be able to nominate the actual public holidays as part of their seven days, you will end up working on those days without any compensation for the disruption of having to work on what is your current entitlement to paid family leave. There is no doubt the seven days that you nominate will be subject to approval as currently applies to annual leave and other time off. They will be subject to minimum staffing levels being available so there will be no requirement for you to work and be paid double time. This will result in a loss of the remuneration you currently receive for working public holidays.

■ If you have any comments on this article, please email focus@swpf.org

What it means to you

The Winsor report runs to 323 pages and contains 62 separate recommendations. Here South Wales Police Federation gives an overview of the main proposals.

RECOMMENDATION 2 - Police constables, sergeants, inspectors and chief inspectors should receive an additional 10 per cent of their basic pay, on an hourly basis, for hours worked between 8pm and 6am (non-pensionable).

Positives - This is one of the few positives from this report. If you work between these hours regularly then you will gain a small amount. Officers have for many years suggested a shift allowance should be paid and this addresses that suggestion.

Negatives - If you are moved off a late shift to meet a different demand such as a football match, if you are taken off late shifts because of medical or maternity issues, or if you choose to transfer to a different role that doesn't work late shifts then you will not receive the payment.

Comment - There is a strong case for an anti-social shift allowance and time will tell whether this scheme will work.

RECOMMENDATION 5 - This removes the necessity for the Police Federation to agree to a Variable Shift Arrangement (VSA) and instead for the Chief Constable to simply consult over shift proposals.

Positives - Swifter changes could be made to standard shift patterns in order to meet a change in demand and, therefore, provide a better response to public need.

Negatives - The Chief Constable could implement a shift pattern that could have a drastic impact on your work-life balance and the Federation would have no opportunity to apply any safeguards. The Chief Constable would need to consult with the Federation but would still be able to implement their preferred choice.

Comment - The Federation is currently able to apply a safeguard to the opportunities considered by a management team which have a performance-related focus. We are able to force that focus to take account of officer needs as well as organisational needs. In

removing that safeguard, such an opportunity would be greatly weakened if not completely negated. We do not accept the arguments put forward by both ACPO and the Association of Police Authorities (APA) to the contrary.

RECOMMENDATION 6 - Officers will not receive any enhancement for casual over-time and will only be entitled to over-time at flat rate. It also states the minimum of four hours over-time for being recalled to duty should stop and you will only receive payment for the hours you work plus travelling time.

Positives - None.

Negatives - You will lose your entitlement to time and a third enhancement for casual over-time and the minimum of four hours will disappear. This will cost you dearly over a 12-month period and if over-time is cheaper, there may be a risk that management will be more likely to use it.

Comment - The Federation has always been of the opinion that it would like to see an end to over-time. We feel our members need a sensible work-life balance and, if we had sufficient officers and an efficient approach to planning, it should not be needed. However, where it is a requirement, officers should receive appropriate remuneration to compensate them for the disruption to private lives and the additional stresses caused by working long hours. This recommendation is a clear attack on that stance.

RECOMMENDATION 7 - Removes the right to double time payment if you are required to do duty on a rostered rest day with less than five days' notice. Time and a half premium pay should be payable for working on a rostered rest day with less than 15 days' notice.

Positives - This will remove the confusion over when or if you are entitled to double time over-time.

Negatives - You will lose the double time over-time rate for working on a rostered rest day with less than five days' notice.

Comment - This is another cost-saving

exercise that does nothing to improve efficiency. If this is adopted you will be warned to work on a day that you thought you would be having off with, perhaps, a day's notice and you'll be able to claim only time and a half for the inconvenience. With rest days already being cancelled on a routine basis and with the possibility of us hosting at least one premiership football team next year, expect this recommendation to simply exacerbate those issues.

RECOMMENDATION 8 - This will allow you to nominate seven days throughout the year that you can declare as a public holiday. The only fixed public holiday will be Christmas Day (other than for those who have elected a different religious holiday).

Positives - Offers flexibility on when public holidays should be taken.

Negatives - This means you will only ever be entitled to eight public holidays regardless of how many there have actually been that year.

Comment - This is another hidden wage cut. You will most likely have to nominate days that have sufficient staffing levels so you are then not required to work. In effect, this recommendation takes away your right to public holidays and instead gives you seven additional annual leave days.

RECOMMENDATION 11 - Police officers on mutual aid service should be paid for the hours they are required to work each day, plus travelling time to and from the place of duty.

Positives - None.

Negatives - It takes away the entitlement for a minimum of 16 hours' pay when held in reserve on mutual aid and staying overnight away from home.

Comment - This means you can be taken anywhere in the country, for any period of time and receive no remuneration whatsoever for it. If you work over-time or anti-social shifts, as defined, you'll get exactly the same as you would if you were working in your home force and able to go home to your family at the end of

each shift. That is disgraceful and you should expect the Force to make good use of this when we are required to police events such as the Olympics and G8.

RECOMMENDATION 12 - This clarifies the requirement for reasonable accommodation when taken on mutual aid. It should be a 'single occupancy room with use of en suite bathroom facilities'. Where such accommodation is not provided, the officer should receive a payment of £30 per night.

Positives - We've often complained about the poor standard of accommodation when taken on mutual aid.

Negatives - This recommendation will offer no comfort to those who will have to share sub-standard accommodation in the knowledge they will not be receiving any over-time.

Comment - A £30 bribe that will feel like a smack in the face.

RECOMMENDATION 13 - Officers held in reserve on a day and who have not been paid for any mutual aid tour of duty that day, should receive the on-call allowance of £15.

Positives - None.

Negatives - If you're off-duty but being held in reserve, you get £15 for your inconvenience.

Comment - That is a disgraceful abuse. If you are away on mutual aid, are allowed a day off but unable to return to your family or drink alcohol, you will get the same as someone who is simply on call in their home force.

RECOMMENDATION 14 AND 15 - Both these recommendations refer to outside business interests - one to clarify the position on such interests and the other to remove the entitlement to appeal to the Secretary of State. There is no negative or positive inference on the recommendation.

RECOMMENDATION 19 - Refers only to special constables but may impact on the police budget if Chief Constables wish to reward specials.

RECOMMENDATION 20 - Police officers and all members of police staff below the top of their payscale should be suspended at that increment for a two-year period from September 2011.

Positives - None.

Negatives - You will not receive the pay rise you are entitled to for another two years.

Comment - This is an attack on our lowest paid officers and a disgraceful step to take, particularly when our annual pay award has also been frozen for two years.

RECOMMENDATION 22 - Forces reviewing their performance and development systems and training for managers should do so in the knowledge that they may be used in determining pay within the next two to three years.

Comment - This seems to be referring to a more efficient PDR system that has some relevance to pay structures. An efficient PDR system is something that has eluded the great minds in every force in the country to date so don't hold your breath.

RECOMMENDATION 29 - Competence Related Threshold Payments (CRTP) should be abolished from 31 August 2011 and all outstanding CRTP payments up to that date should be paid on a pro-rata basis.

Positives - Only that it will be paid to the date of removal.

Negatives - Another cost-saving the Federated ranks have to cover.

Comment - The CRTP was introduced by the Labour Government under the Police Act 2003 and has been an accepted part of police pay ever since. It is pensionable. It is not a bonus but an element of basic wage. Removing this payment is a means of reducing the basic wage of officers.

RECOMMENDATION 30 - Chief officers should continue to be able to make ex gratia payments of £50 to £500 to any officer to recognise a piece of work which is outstandingly demanding, unpleasant or important.

Positives - The bonus payment stays for those carrying out the duties described.

Negatives - The payment has been shrouded in mystery since its inception and does anyone actually know who is entitled to it? How often has more than £50 been paid to an individual officer?

RECOMMENDATION 31 - Chief officers should recognise whole teams, both officers and staff, with a team recognition award payment of £50 to £100 each for

outstandingly demanding, unpleasant or important work, or outstanding work for the public.

Positives - A new bonus payment available to officers.

Negatives - Likely to mean officers who have carried out the relevant duties will not get awards of a maximum of £500 but will receive a payment of £50 to £100 instead.

Comment - This is a new bonus similar to the bonus payment above but would be payable to teams of officers instead.

RECOMMENDATION 32 - ACPO and the Police Federation of England and Wales, along with other interested parties, should convene a working group to establish a series of new national policing awards.

Comment - This is an administrative task and it's not clear to which awards it refers.



RECOMMENDATION 33 - Special Priority Payments (SPP) should be abolished from 31 August 2011 and all outstanding SPPs up to that date should be paid on a pro-rata basis.

Positives - This has always been a divisive payment that placed 40 per cent of the workforce in conflict with the rest. The Force decided on a complex qualification process that has caused confusion and ill-feeling since its inception. ACPO was supportive of the then government introducing this payment but, with the

Continued on Page 6

What it means to you

Continued from Page 5

political wind blowing the other way, ACPO is now supportive of its withdrawal.

Negatives - Whether the payment was a good idea or not, many have now come to rely on it and will, as a result of this recommendation, be at least £1,200 down on their annual income.

Comment - The Federation has never supported the SPP and never took part in the decision-making process of who would receive it. There are no real complaints over its loss but, as it has become an accepted element of the pay structure, the money should instead be spread evenly across the workforce. Remember, the police wage bill always funded the SPP and a minimum of two per cent of the wage bill was put aside to



pay for it. We are therefore losing two per cent of our overall wage bill - another cut to an officer's basic wage.

RECOMMENDATION 34 - An interim Expertise and Professional Accreditation Allowance of £1,200 per annum should be introduced from September 2011 for officers meeting the skills or length of service criteria in the four stated priority functions.

Positives - A new payment for those who fit a tight definition.

Negatives - This seems to replace the SPP but is much more tightly regulated. The qualifying roles will be set nationally as opposed to force-wide and the current groups seem to be as divisive as SPP.

Comment - NPT will be included as long as they have been on their communities

for at least three years. It may be a cynical thought but, in these days of financial constraints, is it too much of a leap of the imagination to consider that a chief officer may remove an NPT officer from their community after three years in order to save £1,200? The others considered for this reward include firearms officers, PSU officers and PIP qualified officers. This is nothing less than a blatant bribe to those who will be pivotal in the coming years but who could effectively hold the Government to ransom if they were to withdraw their authorisation in their chosen speciality.

RECOMMENDATION 35 - The Expertise and Professional Accreditation Allowance should be expanded or replaced when a more sophisticated system of job banding or professional accreditation is established and has been introduced.

Comment - So, as with the SPP, this could be withdrawn at any time by the Government.

RECOMMENDATION 37 - Police authorities should be required to pay all reasonable costs arising from the sale and purchase of a chief officer's house, and should pay all tax liabilities arising from any relocation packages.

Comment - With the removal of housing allowance to new recruits back in 1994, is it really acceptable in these times of crisis to be offering such generous terms for chief officers, when their relocation will normally be as the result of a conscious decision by them to apply for a job in another force?

RECOMMENDATION 40 - The section on officer accommodation in the 'Guide to conditions of service for police officers seconded to central services' should be revised.

Comment - This affects seconded officers and states that they should be accommodated in police owned property where possible.

RECOMMENDATION 41 - Receiving organisations should list where they have agreed exceptional accommodation charges with officers in their annual report on an anonymised basis.

RECOMMENDATION 42 - Regional allowances should remain unchanged in

the short term.

RECOMMENDATION 43 - The replacement allowance for housing should remain. However, the amount an officer receives should not increase from 31 August 2011 with changes in personal circumstances, such as promotion.

Positives - Housing/rent allowance is an important element of the wage packet of those officers who joined the service prior to its disappearance and it is welcome news that it is being allowed to remain.

Negatives - None.

RECOMMENDATION 44 - A national on-call allowance for the Federated ranks should be introduced from September 2011. It should be £15 for each on-call after the officer has undertaken 12 on-call sessions in the year starting from September 1.

Positives - This creates an official on-call allowance that could not be withdrawn by the chief officer. It will be paid to ranks up to, and including, chief inspector.

Negatives - At £15 per on-call period it is less than the current agreement of £25 in South Wales Police. You must also complete 12 such periods before qualifying for the on-call payment so the first 12 periods each year will be free for the Force.

RECOMMENDATION 45 - The national on-call allowance should be reviewed by the Police Negotiating Board three years after its introduction in the context of better management data.

Comment - Winsor stated the lack of data meant he was unable to apply a higher payment to on-call. Hopefully, with three years' data to call on at the review date the payment will increase in future years.

RECOMMENDATION 46 - The link between the Motor Vehicle Allowance for police officers and that for local authorities should be re-established from September 2011.

Comment - HMRC dictates the tax-free allowance for motor vehicle allowance and it's unclear at this time how linking the police allowance to the local authority allowance would affect things.

RECOMMENDATION 48 - Maternity leave will increase from 13 weeks on full pay to 18 weeks on full pay.

Positives - Officers will welcome this as it supports families and offers financial assistance at a stressful time.

Negatives - Abstractions from the workplace will be extended so the Force will need to plan effectively to ensure a continuity of service.

RECOMMENDATION 51 - Regulation 13 of the Police Regulations 2003, which allows for the dismissal of officers, should be retained for probationary officers.

Comment - This is no change from current procedures.

RECOMMENDATION 52 - All police forces should take steps to learn from police forces which have attained best practice in the area of the handling of poor performance and discipline, including in the training of supervisors who may have to use UPP procedures.

Comment - Surely that's what they should have been doing for the past eight years? Despite paying for national HR meetings where these things are discussed, every force still does things differently.

RECOMMENDATION 53 - Police forces should collaborate to identify a cadre of assistant chief constables who specialise in unsatisfactory performance and attendance procedures and hear cases across police force boundaries.

Comment - This sounds reasonable but will probably result in delays as there will be less senior officers to hear the issues. It may increase costs as ACCs are required to travel around the region hearing such cases.

RECOMMENDATION 54 - The Police (Performance) Regulations 2008 should be amended to provide that if a police officer has had two or more adverse determinations made against him, on substantive (rather than procedural) grounds, in concluded UPP proceedings within the past five years, subsequent UPP proceedings should begin at Stage 3.

Positives - Ultimately, if implemented correctly (a big 'if' granted!), the UPP process should be supported as it is in no-one's best interests to have officers who persistently under-perform. This will allow such officers to be dealt with more efficiently.

Negatives - This makes it easier to

dismiss officers who may need support from an earlier stage in their careers.

Comment - The Force has shown itself to be inefficient and lacking in transparency when dealing with UPP issues. Until proper safeguards are implemented, proper training is given to supervisors and a truly supportive structure is implemented to assist officers who may be struggling, there will be cynicism about the implementation of any process that makes it easier to dismiss officers.

RECOMMENDATION 55 - The Police Pension Regulations should be amended to allow chief officers to make a choice in relation to the time at which their pension benefits crystallise.

Comment - This affects chief officers and relates to tax implications based on their age and length of service on retirement. Winsor states they should be able to defer their pension to a later date in order to minimise their tax liability.

RECOMMENDATION 56 - The existing regime concerning the severance terms that may be provided to chief constables and deputy chief constables should be retained in the short-term.

Comment - This refers to senior officers and their short-term contract issues.

RECOMMENDATION 57 - The criteria for the use of the powers in Regulation A19 should be amended, with service-critical skills and performance being explicit considerations.

Positives - This requires the chief officer to consider the individual skills and performance of an officer potentially subject to A19.

Negatives - In reality, if an officer has service-critical skills, they may well be able to make a strong case for an exemption to A19 in any case.

Comment - This is unlikely to change anything. If chief officers want you out, your skills and performance will be considered and you'll then be required to retire. This offers no greater safeguard than presently exists.

RECOMMENDATION 58 - As quickly as possible, police forces should be provided with the ability to offer voluntary exit terms to police officers.

Positives - Currently there is no opportunity to achieve voluntary

redundancy and some officers may benefit from such a scheme.

Negatives - Mark Reckless MP has a private member's bill currently pending in Westminster recommending a compulsory redundancy capability for police officers. This could open the door for such a compulsory programme to be accepted and officers could then be laid off without the benefit of a pension as under Regulation A19.

Comment - Greater Manchester Chief Constable Peter Fahey gave evidence to the Home Affairs Select Committee recently dismissing the need for a compulsory redundancy capability and we would strongly agree. There are sufficient tools available to the force to remove officers who are inefficient or ill-disciplined and removing officers in other circumstances would be inappropriate. We have no access to employment tribunals, other than on the grounds of discrimination, so such a process would inevitably open further legislative requirements to establish a safe and transparent process.

RECOMMENDATION 59 - This extends the time within which an officer must be appointed following written notice to return to full-time duties from the current one month to two months (if a suitable post exists) and from three months to four months in all other cases.

RECOMMENDATION 61 - Forces and their occupational health departments should continue to develop and improve schemes to monitor the use of long-term sickness, recuperative duty and restricted duty, to improve the management of those on restricted duties and work with officers to bring them back to full duties as quickly as possible.

Comment - We will continue to benefit from the expertise of Jerry Taylor, the Federation's occupational health liaison officer, ensuring a safeguard against over-zealous persuasion techniques and inappropriate policy decisions.

RECOMMENDATION 62 - Current sickness policies should remain unchanged in the short term.

Comment - We will continue to monitor the management of sickness.

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Regulation A19 - the moral dilemma

Some of our most experienced officers will be forced to retire, many against their wishes, now that the Force has decided to implement Regulation A19.

The use of this Regulation, which is part of the Police Pension Regulations 1987 (as amended 2006), causes a great deal of ill-feeling but the legal position is now relatively clear on its use.

The following narrative outlines some of the steps previously taken by the Police Federation to defend the rights of its members, explains the legal complications involved and displays the Force's process map to help those who are, or may be, subject to this Regulation.

Regulation A19 states:

Compulsory retirement on grounds of efficiency of the force

A19 - (1) This Regulation shall apply to a regular policeman, other than a chief officer of police, deputy chief constable or assistant chief constable, who if required to retire would be entitled to receive a pension of an amount not less than two thirds of his average pensionable pay or would be entitled to receive a pension of such an amount if it did not fall to be reduced in accordance with Part VIII of Schedule B (reduction of pension related to up-rating of widow's pension) or if he had not made an election under Regulation G4(1).

(2) If a police authority determine that the retention in the force of a regular policeman to whom this Regulation applies would not be in the general interests of efficiency, he may be required to retire on such date as the police authority determine.

The Force used this regulation in 2008 when dealing with the officers on the 30+ scheme. Most of those officers had been approached by the Force and encouraged to apply for the scheme as a result of a comment made to the then Home Secretary, David Blunkett, by a Federation representative in the Federation's national conference.

This queried why few, if any, officers in South Wales were recruited to this Home Office-backed scheme and the query was passed on to the Force.

Many officers received letters asking them to consider accessing the scheme and those subject to the legal challenge argued that they had been given a reasonable expectation of continued employment if they retired as police officers and then rejoined as sworn officers to go onto the scheme.

They further argued that it was conspicuously unfair to encourage them to join the scheme with such an expectation only to force them to retire within a few years or less.

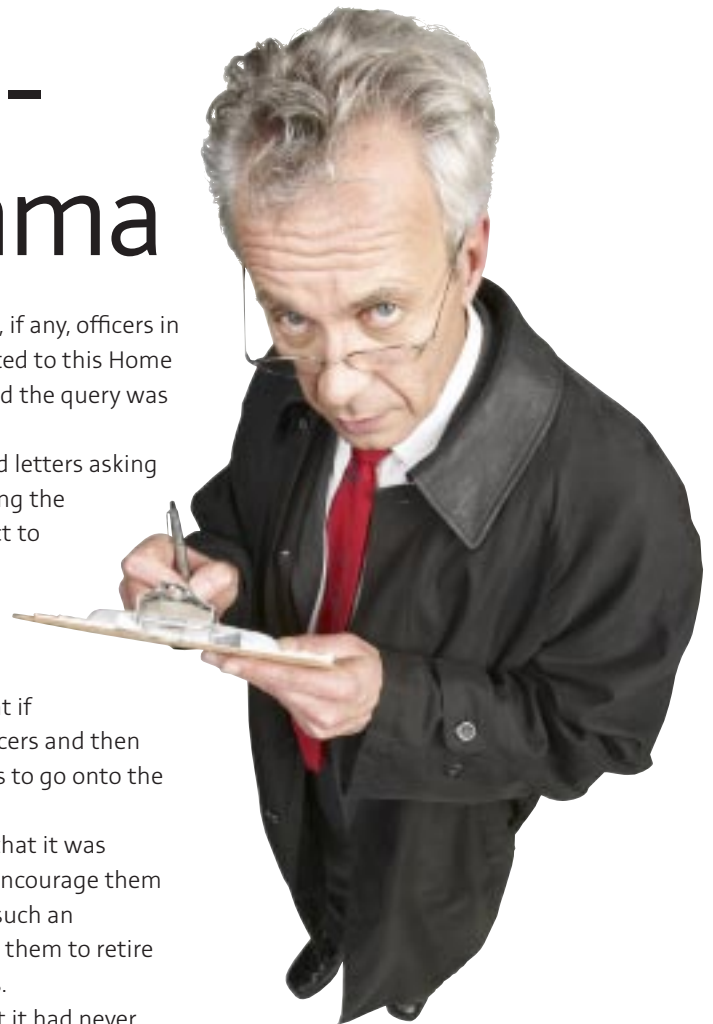
The Force argued that it had never given any such reassurance and it should not be forced to continue with a scheme that had fallen into some disrepute and where the efficiency of the Force was a greater priority.

The Federation challenged the decision to implement Regulation A19 at a judicial review. An injunction was taken out against the Force preventing it from forcing the test officer to retire.

At a hearing at the Royal Courts of Justice in London, the judge, the Honourable Mr Justice Wyn Williams, ruled that Regulation A19 could be used for the greater efficiency of the Force, even where that efficiency relates to financial efficiency.

The Federation's challenge was based on 10 different legal principles and the judge ruled that the Force had acted unlawfully in that it had failed to offer the officers concerned the opportunity to make representations to the Police Authority (via the force command) prior to a decision being made on subjecting them to forced retirement under Regulation A19.

Advice had been sought by the Federation on numerous areas of potential conflict including



discrimination on the grounds of age. The advice obtained was not supportive of this as a potential legal challenge as age discrimination is the only form of discrimination which allows both direct and indirect discrimination to be justified. It was stated that the use of A19 could be justified in this context as, due to the fact that the Force was unable to make officers redundant, it was deemed to be a 'proportionate means of achieving a legitimate aim'. There is no reason to believe that a similar challenge under the current process would receive a different outcome.

So how does South Wales Police intend to introduce and manage this policy over the coming months?

On 14 February 2011 the Police Authority ruled the Chief Constable could invoke Regulation A19. This is initially for a 12-month period. If sufficient efficiency savings are not reached, further authority will be sought.

Whilst the Federation strongly objects to the use of A19, on the basis that we are removing some of our most experienced officers and forcing them to

Continued on Page 10

Regulation A19 - the moral dilemma

Continued from Page 9

retire after providing at least 30 years of often exemplary service, there is a recognition that cost savings need to be made and an acknowledgement that A19 is a lawful process.

The Chief Constable has decided Regulation A19 is necessary for the efficiency of the force and has given three months' notice to 'minimise' the potential difficulties this may cause to officers and their families.

Officers who will have completed 30 years' service in the next two to four years need to be very much aware that they may be subject to Regulation A19 and they may have only three months' formal notice.

Divisional commanders will personally deliver the A19 package to officers. All divisions have now started their roll out of the scheme.

Initially this will apply to all officers, at least of a Federated rank, with 30 years' service or more, or 30 years' service by 1

April 2011. Officers who are subject to A19 need do nothing if they have no intention of applying for retention as they will be retired on the date provided to them. Cyborg and any force references will simply refer to the fact that the officer retired.

If officers wish to be retained, they will be dealt with and finalised within that three-month period. The application will go to the Divisional Commander for endorsement and then forwarded to Chief Superintendent McAlister for consideration. If declined, the officer will have 14 days to appeal to Mark Milton, Director of Human Resources, who will make the final decision. If retained, the officer's position will be reviewed after 12 months. If declined, the officer will be retired with no further avenue of appeal available.

There are four areas which will be considered in this appeal process.

1. Does the officer occupy a role in which their specialist skills are not easily replaced on a Force-wide basis?
2. Is the role one into which we could not and do not transfer officers with relative ease?
3. Does this officer possess a skill for

which they are accredited to train or pass on to other officers and there are insufficient other such accredited/qualified officers to deliver this skill in the Force?

4. Is there any other reason that the loss of this officer will impact on the "operational efficiency" of the Force? This process will apply to officers who are on sick leave and could also be used in relation to suspended officers. This is Phase 1...there are no fixed dates for further phases as yet. However, it has been acknowledged the same three months' notice should be given to future phases.

From a management perspective, the Force is intent on ensuring the legal sustainability of Phase 1 and will consider the next phase once they are satisfied this has been done.

The Federation has been consulted throughout this process and will continue to be involved throughout.

For further advice or support through the appeal process please contact:

Geoff Roberts 07888706748
groberts@swpf.polfed.org

■ If you have any comments on this article, please email **focus@swpf.org**

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Hutton adds to officers' worries

Just two days' after the release of the Winsor report, Lord Hutton's long review of pensions was published.

It called for millions of public sector workers – including the police – to work longer for lower pensions prompting an angry response from union leaders and the Police Federation.

"This is a further kick in the teeth for police officers. In a matter of weeks we have been told we'll face a two-year pay freeze, the Winsor report which may see officers losing thousands of pounds per annum and now this," explains Simon Reed, vice chairman of the national Federation.

"Does this Government really want a Dad's Army of policing? While experience counts, the dangers for the public of sending in 60-year old police officers to deal with public order situations and Friday night drunken brawls seems obvious.

"We have yet to meet with the Home Office to discuss the specifics of what officers will be expected to pay, but let's not forget we already had changes to the police pension scheme in 2006. To that end, officers are already expected to work longer and receive less."

Lord Hutton says his recommendations would lead to "comprehensive reform" making pension schemes "sustainable and affordable" under the pressure of rising life expectancy.

"They will ensure that public service workers continue to have access to good pensions while taxpayers benefit from greater control over their costs," he says.

Lord Hutton's 200-page report makes

27 recommendations impacting on all public sector pension schemes including the police pension schemes.

The Government will now consider the report. In its Comprehensive Spending Review last October, the Government proposed an average three per cent increase in member contributions to be phased in from April 2012.

Any changes to the police pension schemes will be considered by the Police Negotiating Board (PNB), which is made up of representatives of the Government as the Official Side and the Police Federation and other police representative bodies as the Staff Side. PNB next meets on April 14.

"It would be inappropriate to speculate on how individual recommendations contained within the Hutton report may impact upon the current police pension schemes until we know exactly what changes are being proposed," says Ian Rennie, general secretary of the Police Federation.

He adds: "Please be assured that we will do everything within our means to ensure the value of police officers' pensions continues to reflect the difficult and demanding role officers perform on behalf of the public. Work is currently ongoing to ensure we are prepared for that challenge."

The Federation will issue updates as further information becomes available.

To view the report go to www.hm-treasury.gov.uk/indreview_johnhutton_pensions.htm

■ If you have any comments on this article, please email focus@swpf.org



Focus on Regulations

QUESTION: I have been told that rather than booking on duty at 6pm today, I have to book on at midday. I have made plans to go out this afternoon with my wife but now have to go to work. Am I entitled to claim over-time or a recall to duty?

ANSWERS: No, you are not entitled to anything.

RATIONALE: A recall to duty is best described as an island of duty between two rostered tours. In other words, a recall is when you've completed a rostered tour of duty, go home from work and are then recalled to work to complete a period of duty (the island) before returning home again prior to the next rostered tour.

In the circumstances outlined, the Force has simply brought forward the starting time of your tour of duty and the island referred to above does not exist. Consequently, it is not a recall to duty.

If your starting time had been brought forward into a day on which you had already completed a tour of duty, that would be referred to as an advance of hours. However, as long as you've had at least eight hours' notice of your new start time, you again would not be able to claim any over-time.

For example, your rostered tours of duty are 0800 to 1700 on Monday and Tuesday. You complete your tour of duty on Monday and, at 2100 that night, you receive a call at home to tell you that you must report for duty at 0500 the following day (instead of your rostered 0800 start). That provides you with eight hours' notice of the new start time and you are, therefore, not entitled to claim over-time regardless of the impact this may have on your personal plans.

In the rare event of you having less than eight hours' notice, you are entitled to claim over-time at time and a third from your new start time to the normal start time but your tour of duty will still start at the new start time.

If you have any queries regarding Police Regulations, please email focus@swpf.org

Complaints buck national trend

Complaints made against police in South Wales have dropped by eight per cent – contrary to most forces across the UK.

During 2009/10, 715 complaints were made against the Force, compared to 774 the year before, according to statistics from the Independent Police Complaints Commission (IPCC).

On average, across forces in England and Wales, complaints rose by eight per cent. Here in South Wales, they fell by the same figure.

However, the number of allegations against individual officers rose from 1,010 in 2008/09 to 1054.

The Force is one of just seven that saw a decrease in the number of complaints. Superintendent Martyn Jones of the

South Wales police Professional Standards Department, said: "We are continually increasing our efforts to become more accessible to the public and to increase awareness of the complaints process.

"We are working with our communities, particularly those who are traditionally less likely to raise concerns about police officers, for example, young people and those from minority groups.

"We expect the highest levels of professionalism and integrity from all our staff so, when necessary, firm and appropriate action is always taken."

Nationally, 33,854 people complained about the police in England and Wales.

■ If you have any comments on this article, please email focus@swpf.org

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Regulation A20 - compulsory retirement on grounds of disability

The Force has decided to take a more aggressive approach to the use of Regulation A20 which deals with the forced retirement of officers on the grounds of disability.

This is in addition to the use of Regulation A19 of the Police Pensions Regulations 1987 (as amended in 2006) which affects officers with 30 years' service.

So what is Regulation A20 and will it affect you?

The regulation states:

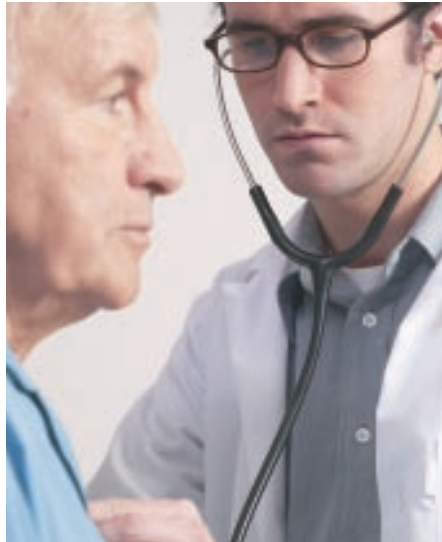
Every regular policeman may be required to retire on the date on which the police authority, having considered all the relevant circumstances, advice and information available to them, determine that he ought to retire on the ground that he is permanently disabled for the performance of his duty: Provided that a retirement under this Regulation shall be void if, after the said date, on an appeal against the medical opinion on which the police authority acted in determining that he ought to retire, the board of medical referees decides that the appellant is not permanently disabled.

This is not necessarily the same as being a 'restricted officer' where you are restricted from carrying out operational, confrontational, front-line duties and so on.

Unfortunately there appears to be no formal definition of the term 'restricted' available but if you are not deemed to be permanently disabled from performing the ordinary duties of a police officer, you cannot be subject to Regulation A20.

To fall under the auspices of A20, you have to be incapable of carrying out the full ordinary duties of a police officer and, in addition, it must be determined that your condition is permanent, ie for the rest of your life.

This determination is made by a doctor known as the Selected Medical Practitioner (SMP) following a referral by the Force. This referral could be at the request of the Force or of the officer but



there needs to be some evidence of permanency in order to instigate the process.

The SMP will examine you and refer to your medical history and records. The SMP will then compare your capabilities to a list of competencies such as the ability to sit, stand, input information into a computer and the ability to restrain a prisoner as well as a few other topics.

If you are unable to successfully partake in any of these competencies as a result of your injury or illness, and you'll be unable to do so for the rest of your life, you would be declared permanently disabled and, therefore, issued with a H1 certificate of permanent disability.

It is at this stage that Regulation A20 kicks in. The Police Authority now has the responsibility of deciding if you can be retained as a police officer or if, having exhausted any and all alternatives, you should be forced to retire on the grounds of disability. This responsibility has, in our Force at least, been delegated to the Director of Human Resources who acts as the relevant authority for these decisions.

The Director of HR will consider the condition of the officer and compare it to the strategic needs of the organisation. He is legally obliged to take cognisance of regulations, guidance, PNB agreements, Home Office circulars and stated cases when deciding whether a reasonable adjustment can be made to

accommodate the officer as a warranted officer or member of support staff or, if no such adjustment can be made, to require the officer to retire.

There is a raft of case law in relation to reasonable adjustments and how they abut to and interlink with Regulation A20 and our Occupational Health Liaison Manager, Jerry Taylor, is as, if not more, knowledgeable of these than anyone else in the Force.

Included in these are the cases of South Yorkshire Police v Jelic (also refers to Randall) and Norfolk v James which confirm that if a suitable role can be identified, the employer should at the very least be exploring options for redeployment and consulting with the employees concerned where the alternative is dismissal.

It is essential that you contact Jerry if you are referred to the SMP or if you are already in possession of a H1 certificate.

Since 2003 the number of officers retired under Regulation A20 has reduced by 61 per cent and therefore in the past couple of years, very few officers have been retired in this way.

The Force now says that the number of restricted officers, including those who had earlier been prevented from justifiably retiring, has grown to a figure that it now believes is unsustainable.

Some of these officers will now be subject to the latest crackdown. However, many others may be dragged into this situation who have absolutely no desire to retire and genuinely wish to continue to provide an effective and meaningful role within the organisation.

The Federation will support you with all at our disposal and it is essential to contact Jerry at the earliest opportunity if you may be subject to this process.

We await the Chief Constable's promise of consultation on this process and assure you we will, subject to legal advice, robustly challenge inappropriate A20 decisions.

■ If you have any comments on this article, please email focus@swpf.org

Protect your assets



By Kirsten Grotte, Russell Jones & Walker's South Wales Police representative

In today's society, more and more people are marrying or forming relationships later in life and often, when they already have built up a substantial amount of personal wealth and assets.

Alternatively, people may be marrying for a second time and, after having already potentially lost out in a previous divorce, wish to ensure that they are better informed about the pitfalls of a potential relationship breakdown.

In the above circumstances, the best course of action is for both parties to seek independent legal advice, prior to cohabitation or marriage. Russell Jones & Walker's family department has experts in advising clients about pre-nuptial agreements or cohabitation contracts.

Pre-nuptial agreements

These are agreements drawn up between two potential spouses that set out what each would be entitled if the marriage were to fail. At present, even after the Radmacher case, such agreements are not legally binding. However, the agreements are increasingly persuasive and the court would normally have to have good reason not to follow the terms of the agreement upon divorce.

To ensure that the agreement is as influential as it possibly can be, both parties need to ensure that they have both given full documentary disclosure to the other party of their current financial position. Further, both parties need to be independently legally represented, to ensure that they receive the best legal advice to suit their position and circumstances

If all of the above is carried out, then following the unfortunate breakdown of the relationship, a court is likely to be persuaded to adhere to the terms of the agreement to form the basis of any ultimate financial settlement between the parties.

Cohabitation contracts

If a couple are intending to cohabit and one or both have personal assets or wealth they wish to protect, then it is advisable for them both to seek independent legal advice as to the possibility of a cohabitation contract.

The difference between this and a pre-nuptial agreement is that such a contract can be binding in the courts. This is due to the fact that there is a common misconception as to the legal status of a cohabiting couple.

In this country the law in this area is very black and white – you're either married or you're not. There is no such thing as a 'common law wife'. Therefore, if you are not married but cohabiting, and you come to separate, then you will not be in a position to rely on the matrimonial law for protection and financial relief.

Furthermore, if you buy property with your partner, be sure to get advice at the time of purchase as to how best safeguard your financial interest, especially if you put in more capital than your partner because once the house is bought it is too late to protect your interest. So, for example, if a cohabiting couple are intending to buy a property together but are paying the deposit in unequal amounts then their intention may be that upon separation, they should both have their initial amounts returned to them. However, the majority of couples in this situation, without legal advice, will simply proceed to buy the property in joint names, as joint tenants. If this is the case, then upon separation, a civil court will apply strict property law and award each party 50 per cent and will not take account of their unequal contributions.

For further advice

If either you or a family member wish to receive any advice on matrimonial matters or those involving children for example, Kirsten offers an initial appointment free of charge either by telephone or at a face-to-face meeting at the Federation office.

The Federation also hosts a monthly surgery and Kirsten will be in the office on 18 April, 13 May and 20 June. If you wish to arrange an appointment please contact **Kirsten on 0161 383 3644** or **her secretary, Helen, on 0161 383 3649**.

You can also email **Kirsten at k.g.grotte@rjw.co.uk**

Protecting minority groups

By Caroline Grisley

I have served on the Federation for five years as the Minority Gender Reserve Inspector's Seat. I have been the equality lead for the Federation for three years.



It has taken some time to get up to speed with legislation and procedures which continue to change regularly. My role as the ELO is to take a strategic view of how South Wales Police delivers its commitments to the protected characteristics: age, disability, gender, race, religion and belief, sexual orientation, transgender, pregnancy and maternity, marriage and civil partnership and our own Welsh language.

With the huge upheaval that policing is facing, my concern is that the progress we have made in diversity will be swept away as being 'luxuries' that the organisation can no longer afford.

However, the law still protects officers and I, along with all the Federation representatives, in particular those who make up the Welfare Committee and the other Reserve Seats, will continue to challenge policies and procedures that disadvantage people with minority issues.

I also continue to support people facing confrontation of any kind with the organisation. The launch of this Federation magazine also allows me to communicate information and case law that continues to develop in the arena of diversity.

Although the majority of officers may not feel that diversity issues relate to them, progress in officers' rights often has an effect on the mainstream community for example, paternity leave. Please remember it is the responsibility of everyone to maintain and develop a society where we can all live safe and fulfilling lives.

A key area that is changing society is the Equality Act 2010 which has brought together almost all the legislation on diversity.

The Equality Act 2010

- The Act brings together for the first time all the legal requirements on equality that the private, public and voluntary sectors need to follow.
- It affects equality law at work and in delivering all sorts of services.
- It replaces all the existing equality law including:
The Equal Pay Act 1970,
The Sex Discrimination Act 1975,
The Race Relations Act 1976 and
The Disability Discrimination Act 1995.

Most of the new law is based on current legislation which has been streamlined but there are some important differences.

Who the law protects

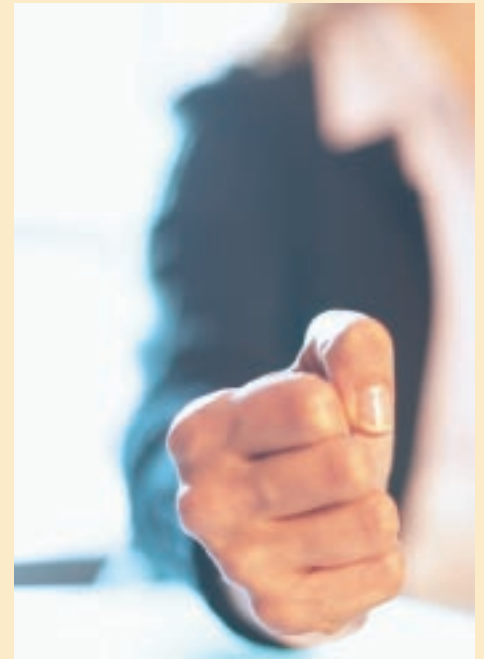
- Whether at work as an employee or in using a service, the message (or purpose) of the Equality Act is that everyone has the right to be treated fairly at work or when using services. It protects people from discrimination on the basis of certain characteristics as listed above and they vary slightly according to whether a person is at work or using a service.

What the law protects against:

These are the main forms of prohibited conduct:

Discrimination. This includes:

- Treating a person worse than someone else because of a protected characteristic - direct discrimination. Although in the case of pregnancy and maternity direct discrimination, this can occur if they have protected characteristic without needing to compare treatment to someone else.
- Putting in place a rule or way of doing things that has a worse impact on someone with a protected characteristic than someone without one, when this cannot be objectively justified - indirect discrimination.
- Treating a disabled person unfavourably because of something connected with their disability when this cannot be justified - discrimination arising from disability.



- Failing to make reasonable adjustments for disabled people.

Harassment

- Unwanted conduct which has the purpose or effect of violating someone's dignity or which is hostile, degrading, humiliating or offensive to someone with a protected characteristic or in a way that is sexual in nature.

Victimisation

- Treating someone unfavourably because they have taken (or might be taking) action under the Equality Act or supporting somebody who is doing so.

As well as these characteristics, the law also protects people from being discriminated against:

By someone who wrongly perceives them to have one of the protected characteristics;

Because they are associated with someone who has a protected characteristic. This includes the parent of a disabled child or adult or someone else who is caring for a disabled person.

This is clearly a potted summary of the Equality Act 2010. I will continue to give updates and examples that are relevant to policing.

- If you have any comments on this article, please email focus@swpf.org

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