24 March 2015

Dear Lord Goodlad,

The Police Federation is undergoing a significant change programme which we initiated in 2013. We are also being subjected to considerable regulation changes, proposed by the Home Secretary, much of which have not been requested by us and we strongly feel that some are not required, given that we are already changing our entire organisation.

As a matter of principle we feel that the funding of the Federation should be a matter for ourselves, and not Government, as occurs with all other staff associations in the country.

This point has been recognised by a number of eminent parliamentarians, and we have the support of Baroness Harris and Elfyn Llwyd MP, who intend to pray against the Regulations in the Lords and Commons respectively.


In our correspondence with the Home Office concerning this Statutory Instrument, we indicated that on the issues of membership and subscriptions, we were unclear about its intention. Unfortunately the response to our questions on this have not clarified matters.

Of particular concern to us is Regulation 4 (3)(e); the proposal that someone who has never been a subscribing member of the Police Federation of England and Wales will be entitled to the same services as a member who has paid their subscriptions.

This may in effect require the Police Federation to use the voluntary fund to provide legal representation for individuals who were not subscribing to the fund at the time of any incident in question. As an analogy, this is akin to a driver using an uninsured motor vehicle, having an accident, and then contacting the insurance company for cover after the event.
This is unfair and would completely undermine the ability of the Police Federation of England and Wales to represent its members effectively. It undermines our financial ability to represent police officers as we are the only statutory body, established in legislation, to provide this.

We would strongly urge the Secondary Legislation Scrutiny Committee to seek urgent clarification from the Home Office as to their intention and to agree that the Statutory Instrument is unfair if interpreted in the manner described above.

Yours sincerely,

Steve White
Chairman

Andy Fittes
General Secretary