

Recommendations on Grade Structure Review

Hong Kong Police Inspectors' Association

Introduction

This paper is prepared by the Hong Kong Police Inspectors' Association ("HKPIA") in response to the invitation to the Police Force Council Staff Side ("PFCSS") dated 2018-12-06 by the Standing Committee on Disciplined Services Salaries and Conditions of Service (SCDS) for submissions regarding the Grade Structure Review ("GSR") for the Hong Kong Police Force.

2. The paper is intended to be consolidated with relevant submissions from other Staff Associations of the Force to formulate a joint submission on behalf of the PFCSS to the SCDS.

Background

3. The last GSR for all disciplined services was conducted in 2009. Focusing on inspectorate grade, the pay scale of Inspectors ("IPs") was re-structured and the maximum pay point was capped below the rank scale of the Senior Inspector ("SIP") rank while the pay scales of SIP and Chief Inspector ("CIP") were raised by one point in the Police Pay Scale. Besides, it was recommended to retain the two incremental jumps introduced to IP rank.

4. It had been 10 years when the Chief Executive ("CE")-in-Council decided on 2018-10-02 that a GSR would be conducted and subsequently, once every 10 years by the SCDS for all disciplined services grades to ensure that their grade structure and remuneration were effective in attracting and retaining talents. The SCDS is expected to complete the review in 18 months and submit the reports to CE by mid-2020.

5. On 2018-11-29, a meeting was convened between the SCDS and the PFCSS to exchange opinions on the GSR. On 2018-12-06, the SCDS invited the PFCSS to submit written submissions on the GSR by 2019-03-21.

Considerations

6. As highlighted in the letter to the PFCSS by the SCDS dated 2018-11-21, the following guiding principles, not inter alia, would be adopted in conducting the GSR:

- The Government's pay policy for the disciplined services is to offer sufficient remuneration to attract, retain and motivate staff of a suitable caliber to provide the public with an effective and efficient service; and that such remuneration is to be regarded as fair by both civil servants and by the public they serve through broad comparability with the private sector;
- Any changes in the work nature, job duties, responsibilities and workload of each disciplined service and in the public's expectation of the disciplined services consequential upon the changing social, economic and political landscape;
- The recruitment, retention, career progression, staff management and moral situation of each disciplined service.

7. The HKPIA agrees to the guiding principles including those not mentioned above but stated in the letter by the SCDS dated 2018-11-21. By adopting the principles, the considerations stated below at paragraph 9 on the unique role of the Police, the changes in Police work as well as the changing policing environment should be given due regard for the purpose of the GSR.

8. It has to be emphasized that the last GSR was conducted in 2009 while the next would be made in 10 years. Thus, for the changes in Police work and policing environment, not only changes appeared since the last review but also foreseeable changes till the next review should be considered. Besides, certain considerations may not be attributable to new changes but merely that they had been neglected in previous reviews.

9. Due consideration on the following factors should be made.

- ***Changes in political environment:*** During the last review of GSR in 2009, it has not come into anyone's imagination that the Force has to handle prolonged public disorder of similar scale, duration, nature and severity of the Illegal Occupy Movement and Mongkok Riot. Not mentioning repeated life or death

situations during the Mongkok Riot, the prolonged working hours and associated stress and tension illustrates both physical and psychological challenges faced by Police officers.

- Secondly, notwithstanding that all Force members had been loyally and courageously upholding law and order during the Illegal Occupy Movement, the distinctive image of the Force as the agency of the last resort in supporting the Government resulted in breakdown of relationships among family members and friends of officers. Officers faced extra stress when the relationships with their spouse or children turned sour or having friends known for years “un-friend” with them on social media platforms just because they were Police officers. This phenomenon was not common to other disciplined services.
- ***Changes in policing environment:*** The CE announced in her policy address in 2018 that to cope with the rising challenges brought about by technological development, the Government would develop smart law enforcement and strengthen R&D on technologies for security, combating crimes and enhancing the analytical capabilities for digital and forensic evidence. Simultaneously, the Force recently promulgated the Strategic Directions and Strategic Action Plan 2019-2021, which included “Embracing the use of technology for policing in the digital age” as one of the Strategic Directions. It is expected that there would be a dramatic change in the working environment, mode of operation and nature for the Force.
- ***Challenges in recruitment:*** Although the numbers of applicants for the posts of Police Constables (“PCs”) and IPs have been maintained at a high record in recent years, it is reported by the mass media that the numbers of applicants competing for a post of PCs and IPs are actually much lower than those of some other disciplined services. It reflects that the Police Force may be relatively less attractive when compared with other forces. In this regard, there may be concerns on recruiting the most capable persons to fill up the vacancies.
- ***Challenges in motivation:*** With the extension of the retirement age from 55 to 60, officers would have longer service in the

Force. Thus, it is necessary to introduce extra remuneration to motivate officers especially during the extended period.

- Of particular note, the Force has expanded its recruitment for IPs in the past 10 years to cope with the wave of retirement. A large proportion of the serving IPs are recruited within the past 10 years. Some could take the advantage of such mass recruitment and retirement wave to have early promotion in the Force. Their early promotion but at the same time long service would result in promotion blockage to their peer IPs, who are actually the majority of our serving IPs, who join the Force at more or less the same time with them.
- ***Uniqueness being neglected:*** Only Force members require sitting for interviews for the sake of promotion. Officers usually take months of private time to prepare each year while the Force has been taking promotion interviews as a mean to disseminating Force messages, e.g. including integrity management related questions in the interviews to promote integrity management. As a result, the Force as a whole gains by having members keeping abreast of a wide spectrum of Force knowledge and instilled with Force values, which is at the expense of officers' personal time. Officers have to pay extra effort in securing for promotions which is at the same time beneficial to the Force while other disciplined services need not.
- Next, while members of all disciplined services have to abide to the law and relevant disciplinary regulations, Police officers have to be further scrutinized by a public body (the Independent Police Complaints Council ("IPCC")) governed by an explicit law (the IPCC Ordinance). In this regard, there should be no doubt that Police officers are facing stricter monitoring and thus requirements on their manner and at the same time additional stress when comparing with other disciplined services.
- Thirdly, the Force is the only disciplined service, Government department or public body proactively disclosing to the public regarding arrests of its members. Again, it places the Force and its members in greater transparency and under the

watchful eye of the public even when off duty.

Recommendations

10. On top of other suggestions that have all along been putting forward, having specifically considered the context of inspectorate officers and the scope of the GSR, the HKPIA would like to focus on the following recommendations in descending order of priority.

Recommendation One: Commensurate Housing Benefit

11. For IPs joining the Force after 2000-06-01, they are not eligible to apply for quarters once their pay point reached PPS 36. In return, they are allowed to claim for non-accountable cash allowance for 10 years.

12. On the other hand, junior police officers (“JPOs”) can normally acquire married quarters at their ten odd years of service, which means that most can reside at the quarters for around twenty years till retirement, when they could be further allocated with public rental housing flats.

13. Under the current non-accountable cash allowance scheme, IPs can claim for less than HK\$20,000 per month. The amount is only sufficient for renting flats comparable to the standards of certain JPO married quarters. For some JPO quarters situated in private housing estates, the monthly allowance may not even be enough to cover the rent.

14. Thus, JPOs are offered with much better and longer, to be precise, lifelong housing benefit while IPs are only given benefit of similar value but just for 10 years.

15. While housing benefits may be treated as part or kind of income, it is reasonable to expect that IPs should enjoy, if not in proportional to their income, at least equivalent housing benefits as JPOs. It is recommended to review and enhance the housing benefit for inspectorate officers to an extent to ensure that it is commensurate with the differences in the salary with the JPOs.

16. Notwithstanding the above, immediate relieving initiatives might include:

- exempting non-accountable cash allowance from taxation;
- deferring the date of returning the quarters from once the officers started their pre-retirement leave to the date they were struck off strength from service; and
- lifting the income and asset limits for officers to purchase Home Ownership Scheme flats

Recommendation Two: Long Service Increment

17. According to the present pay scale, SIPs would reach their maximum pay point of PPS 42 at their ninth year of service. However, with the extension of the retirement age from 55 to 60 and the promotion blockage arising from the mass recruitment in the past decade and early promotion of some of their peers, most have to remain at the rank of SIPs for a much longer service than their predecessors at the time of the last GSR in 2009.

18. For a direct entry IP joining the Force upon graduation at his age of 22, he would acquire his maximum pay point when aged 31 and remain the same for 28 years till retirement if he was not promoted.

19. It is necessary to introduce remuneration to motivate SIPs after they attain their maximum pay point till their retirement. Benchmarking the Long Service Increment (“LSI”) awards to JPOs upon their satisfactory completion of 12th, 18th, 24th and 30th years of service, it is fair, appropriate and commensurate to grant the same to SIPs.

Recommendation Three: Differential in pay with Station Sergeants

20. It is a general understanding within the Government that a post of a higher pay represents senior in rank when comparing with another post of other departments. The pay scale for Station Sergeants (“SSGTs”) consists of 10 increment points from PPS 22 to PPS 31 while the starting salary for direct entry Inspectors is PPS 23. Unless having early advanced, IPs needs four years to reach PPS 32 to ahead the salary of SSGTs.

21. While the entry salary may be subjected to a number of considerations, it is recommended to address the issue by raising the pay point of IPs at a much faster speed so that they could have higher salary than SSGTs at an earlier time

to commensurate with their greater legal power to excise and at the same time duties and responsibilities to bear.

Recommendation Four: Restructure of IP Pay Scale

22. In the last GSR, the pay scale of IPs was re-structured and the maximum pay point was capped below the rank scale of SIPs. In fact, the role, duty and responsibilities of IPs and SIPs are theoretically and practically the same. For almost all inspectorate postings, there is not any requirement compulsorily requesting the posts to be filled up by SIPs only. Besides, IPs can also act up as CIPs. It demonstrates that IPs are deployed in the same way and contribute to the same extent as SIPs.

23. While salaries should be commensurate with the legal power to be excised, duties and responsibilities particular rank requires bearing, it is not fair to have the maximum pay point of IPs being capped below that of SIPs.

Recommendation Five: Extension of Service

24. It is recommended that officers who joined the Force before 2000-06-01 should also be invited to opt for extension of service to age 60 with a view to facilitating the transfer of expertise and experience to junior officers and ensuring sufficient time for the latter to develop their competence so as to maintain the all along high quality of service of the Force. Furthermore, it could enrich the composition of the workforce to be a mix of senior and junior officers, which could stagger the retirement time of officers to minimize the impact of the next possible retirement wave.

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