

Dear Mike,

23<sup>rd</sup> October 2015

Thank you for meeting with us on Wednesday to discuss the proposed changes to the police funding formula. We all agree with the Constabulary that changes to the formula were well over due but we believe that technical changes to the modelling made over the summer consultation period has disproportionately disadvantaged Lancashire and Cumbria. We also recognise that this issue is about the formula and its application. It is not about the upcoming comprehensive spending review which is a separate matter. We take you at your word that this is about the distribution of the total funding as it stands. You are not being asked to find overall savings through the formula.

There are three main concerns we have relating to the modelling and data used in the formula. Most stem from the changes made over the summer and as the Home Office has not provided the data sets for comparison it was initially difficult to see how changes followed through to end result.

We have now been able to acquire the data and it is our contention that the formula is flawed, with regard to Lancashire, in the following areas:

1. The switch from using "hard pressed" population to "urban adversity" statistics disadvantages Lancashire. As a mixed urban/rural County with a considerable cultural and social diversities this change underplays policing demand. While the difference between the two statistics, is according to you, "not a direct match" the correlation between "the two is very high". **This is not true for Lancashire and we request the two indicators for all North West forces so as to give a full picture as to the effect of the change.**

2. Dropping the approach for capturing and using data based on "ability to raise additional income through precept" transpires to be also a disadvantage to the County. In your letter sent at the beginning of October<sup>1</sup> 2015 you assert that using the inverted tax-base per head indicator produced a ratio that was "relatively flat across forces" and therefore didn't meet the intended purpose. **We request the ratios as calculated for each force in the North West in order to understand the extent of "relatively flat" as far as it pertains to Lancashire.**

3. **Bar Density.** The use of the revised " Bar Density" is unfair to Lancashire and Cumbria. Both Counties consist of numerous small towns and a in Lancashire we also have a number of mid-sized towns. Blackpool, Preston, Blackburn. Such a large scale diversity across such a large geographic area strongly disadvantages Lancashire. The data does not also take into account the policing impact of drinking at home or the taking of illegal drugs in premises other than Bars. It is quite common in rural areas for young

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<sup>1</sup> "Consultation on reform of Police funding arrangements in England and Wales" October 2015 to all Police & Crime Commissioners.

people to drink away from pubs. The factor is too crude and should not command **8%** of the weighting.

**4. Non-Crime indicators.** We ask why you have chosen to use demand for MAPPA, missing persons, A+E and mental health admissions, but have not included MARAC. The difference between actions required to deal with violent and sexual offenders and domestic abuse are small. All require significant response and support from Police. **We believe that best way to gather non-crime indicators is through accurate logging by police over a current timeframe. We ask that the formula is delayed until such time data is acquired.**

**5. Overall Weighting.** We are mystified how the latest weightings has been decided for the new model. The absence of any consultation on such a fundamental part of the process to modernise police funding expose the Home Office to justifiable judicial review. **We ask that before the October 31<sup>st</sup> deadline that you provide a full explanation of how the weightings on page 4 of you October letter were derived. We also ask that you provide us with weightings based on a Bar density weighting of 6% of total.** It is also the case without the ability to compare data produced from the two definitions used for “Bar Density” (density; and density +volume) the consultation can not be considered sound.

The points above not only requires the Home office to pause this new formula process but to re-examine each component of the new formula. It is not a matter of simply offering terms for transition. We do not accept the formula to be correct, based on sound statistics or weighted correctly and ask that it not be applied until changes are made. We believe there are strong grounds for judicial review of the consultation process and would support any forces in taking such steps.

During our meeting you indicated that you would supply us with our data requests before the October deadline. We look forward to your response,

Regards

Ben Wallace MP for Wyre and Preston North  
Lyndsay Hoyle MP for Chorley  
Jake Berry MP for Rosendale and Darwin  
Gordon Marsden MP for Blackpool South  
Seema Kennedy MP for South Ribble  
Cat Smith MP for Lancaster and Fleetwood  
David Morris MP for Morecambe and Lunesdale  
Nigel Evans MP for Ribble Valley  
Paul Maynard MP for Blackpool North and Cleveleys  
Rosie Cooper MP for West Lancashire  
Julie Cooper MP for Burnley  
Kate Hollern MP for Blackburn  
Mark Hendrick MP for Preston  
Graham Jones MP for Haslingden & Hyndburn  
Andrew Stephenson MP for Pendle