

May 2026

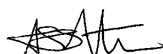
Submission by the Police and Crime Commissioner for Devon, Cornwall and the Isles of Scilly to the Call for Evidence by the Independent Review of Police Force Structures

The Independent Review of Police Force Structures was established by the Home Secretary in March 2026 as part of the series of reforms set out in the government's Policing Reform White Paper published in January 2026.

The terms of reference for the review have been published by the government. <https://www.gov.uk/government/publications/independent-review-of-police-force-structures-terms-of-reference/independent-review-of-police-force-structures-terms-of-reference>. It is due to report to the Home Secretary at the end of summer 2026.

In late April, the review team, led by Lord Bernard Hogan-Howe launched a targeted call for evidence with stakeholders, including Police and Crime Commissioners and Chief Constables. The Call for Evidence sought views on a series of specific questions on police force structures and future governance arrangements. The deadline for submitting responses to those questions was 20th May 2026.

I am committed to ensuring transparency on police reform and its potential local implications. To support this, I am publishing the response that I have submitted to the Review Team's Call for Evidence. I have also recently added a new section to my website to provide information and updates to partners and the public about the reforms which can be accessed at <https://devonandcornwall-pcc.gov.uk/policing-reform>. I will continue to add to these pages as more information becomes available about the upcoming reforms.



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Note sections 1 and 2 are organisational data and not included here.

Section 3 - Police Force Mergers

The questions in this section are for all respondents

4. What are the greatest potential opportunities a policing system with fewer, larger forces could create? (Please rank the top five)

The survey included a list of potential opportunities and asked respondents to rank their top 5. This question was not answered by the Commissioner.

5. What other opportunities might arise from structural reform? [max 300 words]

Q.4 not completed. It doesn't define a 'large' force and cannot be answered in abstract.

All our survey responses are based on our 10 years' experience of governance delivered through accountable political oversight.

Smaller force mergers could bring increased financial resilience and unlock benefits for operational policing services in that area, but this will not be the case for all forces. No evidence that making forces that are already large (like Devon and Cornwall) even bigger will bring opportunities for the public or partners or improve public confidence. The reverse is more likely. As strategic leadership and resourcing become remote with less understanding of local context it leaves rural areas at risk of under-resourcing.

Many of the opportunities in Q.4 can be achieved without mandating significant structural reforms across E&W. Targeted reform that mandates certain matters would be less disruptive for the public, partners and staff, be quicker to achieve and less risky. E.g.:

- Mandating greater regional collaboration for enabling/support services and reforming S22a arrangements. The five Southwest forces already deliver collaborations valuing £86M, with scope to go further.
- Strengthening mutual aid arrangements to speed up mobilisation and target areas that do not deliver would provide additional operational flexibility and resilience.
- Adopting a targeted approach to police force mergers with a minimum police force size (e.g. on population) would address localised financial resilience issues.
- Reforming the police funding formula would support financial resilience by properly reflecting the costs of policing, including the impacts of sparsity and seasonality.

Moving to very large forces will damage the most important strategic and operational relationship policing has locally – with local authorities. Strategic leaders in the police force and the Police and Crime Board will be disconnected from the area, and LPA arrangements will not be able to mitigate this (see later answers).

6. What are the most significant challenges in transitioning to a policing system with fewer, larger forces? (Please rank the top five)

The survey included a list of significant challenges and asked respondents to rank their top 5. The Commissioner's response was:

1. Ensuring clear accountability and governance arrangements
2. Maintaining effective leadership at scale.

3. Maintaining public confidence in policing
4. Ensuring effective and timely operational response and service delivery
5. Maintaining partnership working with local government and wider public sector and other partners / services

7. What other challenges, risks and/or potential unintended consequences might result from structural reform? [max 300 words]

Cannot assess in general terms – will vary depending on local circumstances, the number of forces being merged and the differences in their systems, structures and services.

Every proposed new larger police force must be subject to detailed analysis, including a full financial business case, community impact assessments and an Equality Impact Assessment. It must consider:

- financial costs from aligning systems, harmonising staff pay and conditions and council tax equalisation. Our experiences in exploring a merger with Dorset (documents supplied previously) demonstrate the scale of the challenge for two forces. It will be much larger with more forces.
- realistic assessment of potential efficiency savings recognising the year-on-year savings forces have made over 13 years (cannot compare directly with Police Scotland where austerity and merger happened coterminously) and savings programmes already underway. Last year we identified £4.7m (4.6%) cashable and £1.9m (1.9%) non-cashable savings through priority-based budgeting on the Strategic Alliance annual budget of £101.3m.
- impact of long periods of uncertainty and change on staff, service delivery and pressures on strategic leadership to deliver transformation alongside operational business.
- how public will benefit from becoming part of a larger force, the risks for them and the impact on protected groups.

Significant risk in merging too many police forces into a single force, during transition and over the longer term. Creating very large forces will damage partnership networks, reduce strategic grip and weaken accountability. Poor performance and underinvestment will be harder to identify through reporting, both for the governance body and Chief Constable whose span of control will be too large to manage effectively. Ultimately it is the public who will suffer the consequences through poorer service in tackling crime and public safety incidents. There is a significant risk for rural communities where the strategic policing focus will become overly concentrated in urban areas.

Section 4 – Local Policing

Please only answer the following questions if you have direct or relevant experience.

8. At what level should the following policing functions be organised? [Please provide a response for all policing functions where you have direct or relevant knowledge/expertise]

The Commissioner responded that all of the functions listed should be held at LPA and provided further commentary and explanation on this at question 9.

9. If there are any other policing functions you think are important to include please do so here, indicating if they should be organised at the Local Policing Area level or Police Force level.

There are a large number of policing functions that are not listed in Q8. The Review Team should review the list at Q8 against the policing functions and activities set out by HMICFRS in the Force Management Statement and seek further views based upon this. Also need to be clearer about what functions are expected to go into the National Police Service. What is intended for central ticketing, other homicide offences, violence, prevention and public safety?

If LPAs will focus on the issues that matter most to communities, they must have leverage over a wide range of resources. It is our view that identifying what resources will be held in an LPA cannot be separated from thinking about overall force size.

In a very large force, more resources like roads policing and firearms units, emergency planning teams, safeguarding and public protection will need to sit with the LPA Commander to ensure that their communities can access them and to reflect local context. Also, must recognise that the costs for operational services are disproportionate in a large complex rural geography due to limited strategic road/rail infrastructure and sparsity, as highlighted below.

For example, Devon and Cornwall is already the largest geographic force in England at 4,000 square miles. It is highly rural, with over 59% of our 1.8m population living in rural areas, occupies an isolated peninsula location with over 730 miles of coastline and has the largest road network at 13,500 miles (with 85% of roads classified as rural). Our road network is not supported by National Highways, with less than 20 miles of road included in their strategic road network which means the responsibility for patrolling, broken down vehicles and debris across our network is left to the police.

If our force was to move into a wider south-west force, covering up to 20% of the geographic land mass of England, then many of the services currently delivered at force level would need to be moved to LPA. Failure to do this will create significant risk over the ability of more remote areas to access the services that they need – with resources sucked into the larger urban areas in the north of the region through an over-reliance on crime harm scores. It will also reduce public confidence and undermine policing by consent – in particular given that local residents fund 43% of the policing budget through their council tax.

[Operational policing example removed for published version]

Another major risk for Devon and Cornwall in moving to a very large force is the loss of recognition of the unique characteristics of the peninsula and its implications for service delivery and the cost of delivering those services. Our submission to the Home Office's 2022 Call for Evidence on Seasonality and Sparsity as part of its work to examine the existing police funding formula has been shared with the Review Team. That submission evidenced a number of examples where our geography, lack of transport infrastructure and extreme levels of seasonal demand in both crime and incidents mean that we need to have more resources located in the area and how this affects our costs. These requirements risk getting lost in a larger force that includes significant urban centres at the north of the region.

Securing vital services such as custody, roads policing, firearms and safeguarding within the LPA would provide some mitigation. However, our fundamental position is that a southwest force would not be in the best interests of the public and would not deliver better policing services for them. We are already a large force and the Commissioner's public survey in late 2025 showed

significant support for the retention of a Devon and Cornwall Police force with over 66.4% of respondents selecting this choice. The Commissioner will continue to seek the views of the public on this issue given its potential impact on them.

10. What are the most significant benefits associated with alignment of Local Policing Areas to local government boundaries at unitary authority level? [max. 300 words]

Devon and Cornwall already get many benefits from aligning operational policing boundaries with local authority boundaries. Our isolated peninsula position and rural/coastal challenges mean we rely heavily on collaboration with local authorities and other local agencies like fire and rescue through the LRF, Community Safety Partnerships and bespoke collaborations like the Tri Service Safety Officers. This alignment is particularly important in recovery from major incidents, such as our collective work following the Keyham mass shootings in 2021.

One example where greater alignment could bring benefits is ASB, which is a priority for residents. The August 2023 Local Government and Social Care Ombudsman report 'Out of Order' highlighted wide range of issues around agency collaboration and the key role local authorities have. The approach to ASB in local areas continues to raise significant concerns for the public and any change could present opportunities to look again at improving the system.

More broadly there could be an opportunity to reset and strengthen Crime and Disorder Act 1998 arrangements which are not delivering in some areas. This requires not just greater alignment of policing and local authorities but a wider re-set for all statutory partners. The C&DA 1998 establishes CSPs and requirements for local strategies for crime and disorder, reducing re-offending, combatting drugs and serious violence. Lack of resources, reducing levels of engagement by some statutory partners and variable levels of oversight have weakened some CSPs over the past decade. Opportunities to strengthen this place-based system under LPA arrangements must be considered.

There can be benefits but not if the geographic span of a force is too large or has too many LPAs. Chief Constables will be too disconnected and this will negatively impact understanding of local context, effective grip and strategic leader engagement on long-term planning and emergency response.

11. What are the greatest risks associated with the alignment of Local Policing Areas to local government boundaries at unitary authority level [or most similar unit of local government (e.g. metropolitan district)]? [max. 300 words]

The greatest risk is if there are too many LPAs in a force.

Devon and Cornwall Police is already a large police force. Comprising urban, rural and coastal communities it covers over 4,000 sqm and 6 inhabited islands with a resident population of 1.8m plus millions of tourists annually. Combining the southwest forces would create a huge force that stretches over 250 miles north to south, serves 5m+ residents and could include around 15 local authorities (final number subject to LGR decisions). It is not viable for the Chief Constable or Police and Crime Lead to maintain the required strategic grip and engagement over such geography and will lead to a postcode lottery in policing services.

Chief Constables must be sufficiently connected to the LPA to understand the local context and to build and maintain strategic relationships with leaders and council chief executives. This will be lost if a force becomes too large. The national need to enforce public health legislation during the COVID 19 pandemic demonstrated the need for intense scrutiny on police use of powers.

The Chief Constable controls the range of operational resources that need to be deployed to meet policing needs in that LPA. That includes decisions around what resources are given directly to the LPA and wider force resources the LPA relies on (e.g. control rooms, firearms, roads policing, intelligence). LPA Commanders can lead operational delivery of local policing and partnership working (as our BCU Commanders do) but do not have sufficient strategic influence and do not control what resources they receive.

Every proposal must be subject to detailed analysis of the local landscape and consultation with statutory partners and the public which must feed into the financial business case, community impact assessment and Equality Impact Assessment to understand how it will affect the area.

Section 5 – Interaction with other local services

12. What opportunities could fewer larger forces and the introduction of LPAs create for local partnerships and / or commissioning services? [max 300 words]

A move to fewer larger forces will not bring any benefits to local partnership work or the commissioning of services in Devon, Cornwall and the Isles of Scilly. Our isolated peninsula location and large rural and coastal footprint mean we already work collaboratively across local authority boundaries to deliver peninsula or multi-area initiatives and projects such as Vision Zero South West, Tri Service Safety Officers, the Local Resilience Forum, SARCs, Sexual Violence Contracts, VCSE commissioning of victim services and Operation Encompass.

The detailed plans to deliver the white paper must be complementary to, and deconflicted from, the timing of LGR, devolution and health governance reform. Effective governance of LPA arrangements must sit with the Policing and Crime Lead and the Police and Crime Board, this responsibility should not sit with local authorities or LPA Commanders (see answers to questions in section 6).

It is much more likely that increasing the size of our force – which is already large – will make it harder to work with partners and lead to disruption or termination of long-standing and valuable partnerships.

- Existing partnerships may no longer be viewed as a priority by a Chief Constable who has a remit and responsibility for a much larger force.
- Costs and disruption caused by merging multiple forces will reduce funding and capacity for partnership working for a long time.
- Weakened relationships between Chief Constable/Policing & Crime Lead and other strategic leaders will mean less opportunity to innovate and collaborate.

13. What risks or negative impacts could fewer, larger forces have on local partnerships and / or commissioning services? [max 300 words]

Cannot answer in the abstract, it will depend on the specific circumstances.

Devon, Cornwall and the Isles of Scilly is heavily reliant on small local VCSE organisations to deliver crime prevention, victim support and community intelligence. These relationships need to be fostered and there is a significant risk these services will be disrupted and disappear in a much larger force.

The risks of merging two relatively small forces with similar demands and geography will be different to merging forces which already operate in complex partnership systems with a large number of unitary authorities e.g. Devon & Cornwall. The risks also depend on the scale of existing alignment between those forces as the greater the scale of change required the more disruptive it will be for partnerships.

Mandating significant transformations, such as the merger of 4 or 5 forces will damage partnership working and the commissioning of services.

- Internal change to align force processes and systems will take years to deliver, diverting funding and resources and reducing strategic capacity to focus on problems affecting communities.
- Pressure to align services may lead to a reduced level of service, with provision of services based on the lowest common denominator due to funding and resource pressures.
- Volume of complex change in policing (combined with LGR and transformation in health) creates risks that vulnerable members of the public will fall through the cracks and suffer harm.
- Need to equalise council tax precepts will mean there is less investment in policing for a number of years which will damage service to public and reduce opportunities to expand capacity and enhance performance.

Each proposed new force must be subject to detailed analysis and consultation with findings fed into the financial business case, community impact assessment and Equality Impact Assessment to understand how it will affect the area.

14. What risks or negative impacts could the introduction of LPAs have on local partnerships and / or commissioning services? [max 300 words]

- Inconsistency in approach and engagement from local authorities leading to inequity in policing services, with areas who are more proactive/vocal taking priority. Policing is not the primary focus of local authorities who are responsible for delivering a vast range of public services in their community and levels of interest and engagement in policing matters will vary. We see this now with an inconsistent approach to convening crime and disorder committees (as required by the Crime & Disorder Act). The situation in Scotland is also variable, with differences in approach between local authorities to the frequency, depth and focus they give to local policing scrutiny and discharge of their statutory role.
- Incorrect perception that the LPA Commander is fully responsible for the delivery of policing services within the local area. This could lead to unreasonable expectations from local authority leaders, local communities and other partners which will damage public confidence and relationships when the LPA Commander is unable to meet those expectations.
- Damage to the most important strategic and operational relationship that policing has with partners resulting in poorer service for the public. The relationship between policing and the local authority is central to public safety in areas like public protection, community safety, prevention, road safety and civil contingencies. This relationship will be weakened by moving to very large forces and LPA arrangements will not be able to mitigate or rectify this. The LPA Commander will only have control over certain things and will not be able

to operate sufficiently strategically in terms of investment, innovation and risk. The Chief Constable and the Police and Crime Lead will be too disconnected from local areas and Police and Crime Board members will be making significant decisions on services and investment affecting distant locations with limited understanding of the local context.

Section 6 – Governance

Please only answer the following questions if you have direct or relevant experience or expect to be involved in future policing governance. How can Local Policing Areas (LPAs) be implemented to ensure that:

15. The public can shape the priorities of LPAs? [max 300 words]

This should not be over-complicated. LPA priorities should be part of the Police and Crime Plan.

The Policing and Crime Lead should collect public views by LPA as part of the plan development process they will run on behalf of the Police and Crime Board. Many local communities will be seeking the same high level strategic priorities for their LPA (action on ASB, violence, road safety etc). The Police and Crime Plan can include a specific section on LPA priorities alongside sections on force priorities and the national priorities set by the Home Secretary through the National Strategic Policing Priorities/Strategic Policing Requirement. This process will include the local authority and its leader who will sit on the Police and Crime Board.

If responsibility for gathering public views on local priorities sits elsewhere (e.g. the LPA Commander or the local authority) there will be confusion and a disconnect from the budget and resourcing decisions of the Police and Crime Board and the Chief Constable.

Important to also recognise that the statutory roles and responsibilities given to local policing governance bodies are a fundamental part of hearing local voice. This includes their formal scrutiny and holding to account functions as well as the oversight of public complaints which enable visibility of areas of weakness within the force which require improvement. It also includes the ability for the public to contact the local policing governance body directly to raise issues of concern.

The Police and Crime Board's budget and resources will need to enable it to carry out LPA level consultations and analysis so that the Police and Crime Plan can set out the priorities.

However, if forces are too large, with too many LPAs then the introduction of LPA priorities will be unmanageable and ineffective.

16. LPAs are accountable to local communities? [max 300 words]

Accountability for delivery within an LPA must be consistent, evidence led and transparent. It also needs to cover how all policing services operate in the LPA, not just those within the control of the LPA Commander and so it must involve the Chief Constable. KPIs for public confidence, victim satisfaction, crime outcome rate, complaints and misconduct should underpin accountability.

This scrutiny and accountability should be led by the Policing and Crime Lead, under delegation from the Police and Crime Board. That will deliver regular and consistent accountability.

Relying on local authority structures to deliver scrutiny and provide accountability for LPA activity will lead to inconsistency in approach. Local authorities have responsibility for delivering a vast range of public services in their community and the level of interest and their capacity to engage in policing matters will vary between local authorities. We see this now with the Crime and Disorder Act 1998 and in the arrangements for local accountability which operate in Scotland (as referenced in our answer to Q14) with a variable approach from local authorities and a focus in the centre on force-wide performance metrics.

The size of the police force is highly relevant here and a move to very large forces will weaken accountability at LPA level.

- Issues and concerns will get lost in force-wide data and be harder to spot and address.
- Police and Crime Board members will have little understanding in the challenges or performance of an LPA that is 200 miles away.
- Police and Crime Lead will not have sufficient capacity, resource or local context to deliver effective accountability for what could be 15 LPAs.

17. There is an appropriate relationship between the operational leads of LPAs and local authority leaders? [max 300 words]

System leadership is an area of weakness in policing due to the limited tenure of senior leaders and a lack of appropriate training and development. Operational leadership of partnerships in crisis situations by the police is outstanding, but developing and maintaining long-term productive partnerships remains an area of significant challenge. For LPAs to work we need to radically improve training and development opportunities to support them to engage effectively, to gain and maintain the confidence of senior partners in a political environment and to improve public confidence.

Important to recognise that LPA Commanders, if lower than Chief Officer rank, are not Tier 1 executive leaders in the same way that local authority chief executives are. While LPA Commanders can lead the operational delivery of local policing services and partnership working (as our Chief Superintendent BCU Commanders do currently in Devon and Cornwall) they will not have sufficient strategic influence within the force or with partners and will not control the wider range of resources that are fundamental to effective policing in the local area. Chief Constables must be sufficiently connected to the LPA to understand the local context and to build and maintain strategic relationships with leaders and council chief executives. This will be lost if a force becomes too large.

In developing the LPA arrangements there needs to be proper engagement and consultation with local authorities. Local authority leaders and their chief executives are raising concerns with us locally about moving Devon and Cornwall into a larger force and the detrimental impact this will have on partnership working and accountability. They require strong relationships with the overall strategic leadership of the force, the Chief Constable and also with the Policing and Crime Lead and this will not be viable or effective in a very large force.

18. Local policing priorities are reflected at the regional level? [max 300 words]

Is the question referring to the larger force area or something else? If it is the force area, then see our response to Q 15. No additional action is needed. The local policing priorities should be developed by the Policing and Crime Lead, agreed by the Police and Crime Board and reflected in the main Police and Crime Plan. If this is not the approach there will be a disconnect between local priorities and the funding and resourcing decisions they are dependent upon which will make local priorities meaningless.

19. What existing good practice for policing governance should be built into Police and Crime Boards? [max 500 words]

The Review Team should engage with APACCE and PACCTS for a detailed discussion on required good practice for the new policing governance model. APACCE's existing good practice guidance on matters such as the Corporate Governance Framework and Holding to Account already set this out and are important reference documents.

Complaints and Conduct

The Policing and Crime Board must exercise strong, robust and consistent scrutiny over complaints, conduct and standards. Failures in service delivery and delays in complaints processes reduce the trust and connection between the police and the public. Concerns around serious misconduct, misogyny and corruption and the inadequacy of systems designed to address them as evidenced through formal reviews such as the Casey Review and the Angiolini Inquiry further erode that trust and harm victims. Delivering the required improvements and change at the local level will require robust and consistent scrutiny by the policing governance body. Existing governance arrangements for police complaints should be strengthened not diluted in any new model – with a mandated move to model 2 or 3.

Police and Crime Commissioners are the Appropriate Authority for dealing with Chief Constable misconduct. Having a single person make decisions around conduct, in accordance with statutory arrangements, delivers stronger accountability and scrutiny. How this is retained must be considered in the new arrangements alongside prioritising IOPC reform.

Remit and powers

Ensure that all the duties and powers currently held by Police and Crime Commissioners are given to the new Boards. Also need to introduce the additional powers that PCCs were seeking through the 2021 PCC Review, in particular:

- Granting a general power of competence to the Local Policing Body through statute to align with local authorities and enable more innovative investment.
- Putting the Local Criminal Justice Board on a statutory footing and requiring that it be chaired by the Local Policing Body.
- Giving the Local Policing Body a clear remit for oversight of CSPs and the ability to hold all statutory partners to account for their participation in the system.

Scrutiny and Transparency

The Policing and Crime Lead must have clear, consistent and robust delegations which establish them as the visible face of policing governance at the local level. This includes responsibility for public engagement; financial management; and robust accountability. They should be the face of the Police and Crime Plan, lead force wide and LPA scrutiny and be the decision maker for complaints and ASB case reviews.

The Policing and Crime Lead should sit as Chair of the Police and Crime Board to secure the appropriate status and authority to effect change with the Chief Constable. Appointing one of the local authority leaders as chair will result in a chair that has limited capacity (due to other pressures), a more localised understanding and view of policing issues and may result in instability in leadership due to election cycles. It could also lead to confusion about the scope of the Police and Crime Lead's authority and cause delays to decision making.

Submitted: 20th May 2026