

**Force Disclosure Unit**

Wiltshire Police HQ

London Road

Devizes

Wiltshire

SN10 2DN

Tel 101 ext. 62005

www.wiltshire.police.ukdisclosure@wiltshire.pnn.police.ukDate: 17th August 2021

Our ref: FOI 2021/ 664

I write in connection with your request for information dated 14th July concerning the breakdown for the access for information department.

I am required by the Freedom of Information Act 2000 to handle all requests in a manner that is blind as to the identity and motives of the requestor. Any information released as a response to a request is regarded as being published and therefore in the public domain without caveat.

Your request for information has now been considered, and having consulted our professional standards team, I am happy to supply the information you have requested.

You wrote:

1. Does your authority have a team responsible for responding solely to information requests made under FOIA and another responsible for responding solely to DPA requests or are all information requests dealt with collectively by a single team?
2. Please provide an overview of the structure of your Access to Information department including Job Titles and Pay Grades, for example:
2 x Access to Information Managers (Pay Grade 3)
10 x Access to Information Officers (Pay Grade 4)
2 x Administrative Assistants (Pay Grade 5)
3. Please provide Job Descriptions for all posts included in your answer to Q.2.

Response

1. Both areas are dealt by the Force Disclosure Unit.
2. 1 x Operational Manager – W10
1 x Workflow Co-ordinanator – W5
1 x Principle Decision Maker – W8
9 x Decision Makers – W7 (Including part time)



INVESTOR IN PEOPLE

Jobs Descriptions:-

Operations Manager

responding to requests made under relevant privacy legislation, and associated processes. The post holder will be The post holder will manage the Force Disclosure Unit (FDU) and ensure that the Chief Constable meets statutory responsibilities for responsible for all Subject Access Requests, Freedom of Information, Court Order and will determine what information should be retained or deleted in line with the Records Deletion Process and will be the designated Freedom of Information Officer for Wiltshire Police.

The main responsibilities include managing the department responsible for the formal disclosure of information to statutory bodies, courts and individuals in the following disciplines:

- Freedom of Information (FOI)
- Court Orders
- Data Protection Subject Access Requests (DP SAR)
- Disclosures to governing bodies / employers
- Insurance Memoranda of Understanding
- Records Deletion procedure

This is a management role responsible for the operational effectiveness of the Force Disclosure Unit. This includes resourcing, staff, training, performance, policy and process. The post holder will also be responsible for devising and implementing management systems, processes and practice to ensure that Wiltshire Police meets its statutory disclosure obligations effectively and efficiently.

The force lead in respect of all matters relating to statutory disclosure, the post holder will:

- Anticipate and respond to changes in legislation that impact the disclosure of statutory information.
- Perform the role of Freedom of Information Officer to include being the point of contact for the Information Commissioner's Office where it relates to Freedom of Information.
- Be responsible for disclosures made on behalf of the Chief Constable.
- Ensure effective and appropriate information sharing between agencies, the public, and the media and ensure information sharing and disclosures are compliant with human rights (ECHR), data protection law, safeguarding law and in the interests of safeguarding individuals.

Maintain, direct and influence the force Disclosure Strategy, where it relates to both statutory legislation and common law disclosure.

Principle Decision Maker

The post holder will act as the Principle Decision Maker in the force on the degree and relevance of formal disclosure to statutory bodies, courts and individuals in the following disciplines:

- Freedom of Information (FOI)
- Court Orders
- Data Protection Subject Access Requests (DP SAR)
- Insurance Memoranda of Understanding

The role will also have responsibility:

To ensure legislative demands are achieved and appropriate levels of quality assurance is undertaken.

To provide guidance and support to the FDU decision makers.

To progress complex statutory disclosure requests as well as any other disclosure requests deemed necessary by the FDU Operations Manager.

To liaise with the Information Commissioner's Office, Courts, Senior Local Authority Solicitors and members of the public when required.

To advise and make recommendations to Head of Information Management & Assurance and the FDU operations manager in relation to disclosure decisions.

- The post holder will be responsible for ensuring that disclosures are processed in accordance with current legislation, common law and best practice.
- The post holder will be responsible for assessing and responding to complaints from the Information Commissioner's Office.
- The post holder will provide the FDU Operations manager with relevant disclosure material and advice when requested.
- The post holder will provide training / disclosure advice as and when required by decision makers
- The post holder will contribute to
 - the recruitment of staff
 - the development of their skills
 - training
 - ensuring timescales are met
 - information assurance
 - working practices
 - motivation of the unit.
- You will be the point of contact for decision makers where it relates to continuous development, delivery outputs and improvement.
- Monitor the FDU's productivity to ensure the achievement of statutory and agreed disclosure timeframes with respect to turnaround times for all FDU disclosure responsibilities.
- Establish quality assurance and training programs to maintain the required standards for processing the different disclosure requests dealt with by the FDU.
- Provide general disclosure training to PCSOs and police officers as and when required.
- Supervise individual performance to identify and address development concerns, which may impact on the Unit's overall productivity.

Decision Maker

The post holders will be the central point in the force with responsibility for formal disclosure to statutory bodies, courts and individuals in the following disciplines:

- Freedom of Information (FOI)
- Court Orders
- Data Protection Subject Access Requests (DP SAR)
- Insurance Memoranda of Understanding
- Disclosure for Legal Aid
- PNC disclosure to Local Authorities
- Common Law Police disclosure

The post holders will also be the central point in the force for advice and guidance on Data Protection, Freedom of Information and general disclosure considerations.

You will be required to identify where in the force key information is located, and once retrieved, review and assess the content for suitability for onward disclosure whilst also identifying any potential harm.

You will research nominals and assess personal data, before analysing and evaluating all information they are connected to, particularly crimes, occurrences, intelligence (including sensitive and confidential), command and control and firearms records together with other relevant information from local force systems. You will also interrogate national databases (including sensitive systems) to gather evidence for the collation, preparation and subsequent disclosure of relevant documentation.

Workflow Co-ordinator

To ensure that all administrative procedures are implemented correctly within the Force Disclosure Unit and wider Information Management and Assurance Department when required and authorised by either the Principle Decision Maker or FDU Operations Manager. This will include the administration, co-ordination and tasking of Family Law Court orders, Subject Access Requests, Freedom of Information Requests, General Correspondence, CAFCASS Disclosures and any other administrative duties as directed by either the Principle Decision Maker or FDU Operations Manager

I am satisfied that all the relevant information has been passed to me and been considered in the light of your request within the time constraints applicable under the legislation.

Wiltshire Police would like to thank you for the interest that you have shown in the Force.

Yours sincerely,

Force Disclosure Decision Maker

Wiltshire Police offers a re-examination of your case under its review procedure.



Force Disclosure Unit

Wiltshire Police HQ, London Road, Devizes, Wiltshire SN10 2DN
Telephone 101 ext 62005

Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

Any person who has requested information from Wiltshire Police, which has been dealt with under the Freedom of Information Act, is entitled to complain and request an internal review, if they are dissatisfied with the response they received.

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing to the:

Force Disclosure Unit
Wiltshire Police Headquarters,
London Road, Devizes,
Wiltshire,
SN10 2DN

Email at disclosure@wiltshire.pnn.police.uk.

The reference number, date of the request and details of why the review is being requested must be included. Requests for review should be brought to the attention of the Force Disclosure Unit within 20 working days of the Force's response to the original FoI request.

3. Review Procedure

Receipt of a request for review will be acknowledged in writing to include confirmation of the reasons for the review. The review will be conducted by another Decision Maker, who is independent from the original Decision Maker. The Force Disclosure Unit will set a target date for a response. The response will be made as soon as is practicable with the intention to complete the review within twenty working days. In more complex cases the review may take up to 40 working days.

The Independent Decision Maker will conduct a review of the handling of the request for information and of decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case, taking into account the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the Independent Decision Maker will reply to the complainant with the result of the review. If the complainant is still dissatisfied following the review they should contact the Information Commissioner to make an appeal. The Information Commissioner can be contacted via the following details:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 01625 545 700
Fax: 01625 524 510
Email: mail@ico.gsi.gov.uk

Please note that the ICO's offices will be closed for the foreseeable future and are therefore unable to receive correspondence via post.

If you should wish you contact them, please visit <https://ico.org.uk/global/contact-us/>