

**Force Disclosure Unit**

Wiltshire Police HQ

London Road

Devizes

Wiltshire

SN10 2DN

Tel 101 ext 62005

www.wiltshire.police.ukdisclosure@wiltshire.pnn.police.uk

Date: 11th February 2022

Your ref: FOI

Our ref: FOI 2021 / 055

I write in connection with your request for information dated 17th January 2022 concerning The Universal Church of the Kingdom of God.

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 I am now able to respond as follows.

You wrote:

My request relates to complaints and charges against The Universal Church of the Kingdom of God also known as UCKG. The church has at least one HelpCentre in your jurisdiction.

If any question is likely to fall beyond the time limit prescribed by the Act, please skip it and answer all those that can be fulfilled.

I would like to know:

1A. Broken down for each year (2017, 2018, 2019, 2020 and 2021), how many complaints were received by the force, in relation to the United Church of the Kingdom of God (UCKG)?

B. If possible, broken down by year, what crimes did these complaints relate to?

2A. Broken down for each year (2017, 2018, 2019, 2020 and 2021), how many charges were brought against individuals in cases which related to the United Church of the Kingdom of God (UCKG)?

B. If possible, for each year, what was the crimes for which individuals were charged?

For each year (2017, 2018, 2019, 2020 and 2021), how many times did the force visit/ were called out to the following premises:

UCKG HelpCentre, 21 Fleet Street, Swindon, Wiltshire, SN1 1RQ



INVESTOR IN PEOPLE

Our response:

Wiltshire Police can neither confirm nor deny that information is held relevant to your request as the duty in Section(1)(1)(a) of the Freedom of Information Act 2000 does not apply by virtue of the following exemption:

Section 23(5) Information supplied by, or concerning, certain Security Bodies
Section 30 (3) Investigations
Section 31 (3) Law Enforcement
Section 40 (5) Personal information

Section 23 is a class based absolute exemption and there is no requirement to consider the public interest in this case. Confirming or denying the existence of whether any other information is held would contravene the constrictions laid out within Section 23 of the Freedom of Information Act 2000 in that this stipulates a generic bar on disclosure of any information applied by, or concerning, certain Security Bodies.

Section 30 is a class based qualified exemption and consideration must be given as to whether there is a public interest in neither confirming nor denying the information exists is the appropriate response.

Section 31 is a prejudice based qualified exemption and there is a requirement to articulate the harm that would be caused in confirming or not that the information is held as well as carrying out a public interest test.

Section 40 is a class based absolute exemption and there is no requirement to evidence the harm or consider the public interest.

Harm in complying with Section 1(1)(a) – to confirm or not whether information is held

The College of Police Authorised Professional Practice for Investigations is a public facing document and provides guidance on the key roles and principles on the process of criminal investigation. It includes guidance for both reactive and proactive investigations, from volume crime to major crime, see below link:

<https://www.app.college.police.uk/app-content/investigations/victims-and-witnesses/>

It clearly states within this APP that when working with victims the success of any investigation depends largely on the accuracy and detail of the material obtained from them. Although the questions submitted for this request are predominantly statistical, they capture all crimes whereby confirmation or denial to the world that any information is held would undermine the confidentiality expected by a victim; some of whom bravely report to the police that they have been subject to serious offences, including sexual offences and non-recent child sexual exploitation.

In addition the College of Policing APP Information Management Module is a national standard adhered to by all police forces across England and Wales. Police information refers to all information obtained, recorded or processed for a policing purpose and includes information which is processed (known as data, including personal data) and information which has been subject to a process of evaluation (known as intelligence), see below link:

Information management (college.police.uk)

Confirmation or denial that information is held relevant to this request would undermine the APP for both Investigations and Information Management.

In addition, to confirm or deny whether information is held in this case has the potential to undermine the flow of information (intelligence) received from members of the public into the Police Service and other outside agencies relating to a whole host of offences. This could in turn lead to police officers having to be removed from their frontline duties in order to increase manpower on an investigation. In order to ensure Wiltshire Police delivers effective law

enforcement we liaise with various other national agencies to provide suitable support. Not only would police investigations be compromised but any enquiries or investigations that other agencies may be undertaking would also be compromised.

Public Interest Considerations

Section 30

Factors favouring complying with Section 1(1)(a)

Confirming or denying whether information exists relevant to this request would lead to a better informed general public by identifying that Wiltshire Police robustly investigate allegations made against a named organisation, such as the UCKG. This fact alone may encourage individuals to provide intelligence in order to assist with investigations and would also promote public trust in providing transparency and demonstrating openness and accountability into where the police are currently focusing their investigations.

The public are also entitled to know how public funds are spent, particularly in the current economic climate.

Certain crimes, such as non-recent child abuse attracts high profile media and public interest connotations. Confirmation or denial that any information exists could provide reassurance to the general public.

Factors against complying with Section 1(1)(a)

Modern-day policing is intelligence led and Wiltshire Police share information with other law enforcement agencies as part of their investigation process. To confirm or not whether victims have reported allegations of serious offences could hinder the prevention and detection of crime as well as undermine the partnership approach to investigations and law enforcement.

Should offenders take evasive action to avoid detection, police resources may well be diverted from frontline duties and other areas of policing in order to locate and apprehend these individuals. In addition, the safety of individuals and victims would be compromised.

Section 31

Factors favouring complying with Section 1(1)(a)

There is some mention, media speculation and rumour within the public domain relating to the activities of the UCKG organisation, and that in itself can be considered to be a factor for disclosure.

Factors against complying with Section 1(1)(a)

Wiltshire Police has a duty of care to the community at large, and public safety is of paramount importance. If an FOI disclosure revealed information (by citing an exemption) or stating no information held, an offender could use this to their advantage which in turn risks compromising public safety as it may encourage offenders to carry out further crimes, or take additional measures to evade detection.

Wiltshire Police relies on information being supplied by the public. Irrespective of what information is or isn't held, by applying substantive exemptions would indicate that information is held and is currently being investigated. Such action would act as a deterrent to the public to provide intelligence to the force which would further undermine public safety, with repercussions that could hinder the prevention or detection of crime.

Balancing Test

The points above highlight the merits of confirming or denying that information pertinent to this request exists. The Police Service relies heavily on the public providing information to assist in criminal investigations and has a duty to protect and defend vulnerable individuals. The public has an expectation that any information they provide will be treated with confidence and in line with the APPs mentioned within the harm. Anything which places that confidence at risk, no matter how generic, would undermine any trust or confidence individuals have in the Police Service.

In addition, the effective delivery of operational law enforcement takes priority and is at the forefront of Wiltshire Police to ensure the prevention and detection of crime is carried out and the effective apprehension or prosecution of offenders is maintained. This includes ensuring our relationship with other law enforcement agencies runs smoothly in the joint approach to multi-agency investigations.

Therefore, at this moment in time, it is our opinion that for these issues the balance test for confirming, nor denying, that information is held is not made out.

No inference can be taken from this refusal that information does or does not exist.

Section 17 of the Freedom of Information Act 2009 requires Wiltshire Police, when refusing to provide such information (because the information is exempt) to provide you the applicant with a notice which:

a) states the fact b) specifies the exemptions(s) in question c) states (if not otherwise apparent) why the exemption applies

The exemption is as follows.

23(5) Information supplied by, or concerning, certain Security Bodies

40 (5) Personal Information

30(3) Investigations

31(3) Law Enforcement

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

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