



Force Disclosure Unit

Wiltshire Police HQ
London Road

Devizes

Wiltshire

SN10 2DN

Tel 101 ext. 62005

Website: www.wiltshire.police.uk

Email: disclosure@wiltshire.police.uk

XXXXXXXXXX

By email

Date: 29th June 2022

Our ref: FOI 2022/504

Reply contact name is: Abigail Standidge

Dear XXXXX,

I write in connection with your request for information dated 15th June 2022, concerning Freedom of Information requests.

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.

Following receipt of your request, research was conducted by the Digital Services Manager, Force Policy Officer, Temp. Head of IT, Force Disclosure Unit and Finance department at Wiltshire Police.

Your request for information has now been considered and I am able to respond as follows.

You wrote and **our response:**

1. What information is harvested from email and online website Freedom of Information Act requests made to your Police force such as Meta Data, IP addresses, MAC addresses or other similar information such as the number of requests by sender email addresses or another identifier?

No information held.

The Wiltshire Police website is part of something called Single Online Home, which is the national website for policing run by the Metropolitan Police Service / Home Office. Therefore, *if* metadata such as IP and MAC addresses are harvested, this would be something that is done by either of these organisations - **although this does not imply this is something either organisation practice.**

From the website, Wiltshire Police receive two things:

- The text of the original requests (i.e. what the user has inputted on the form (not Metadata), IP addresses etc) which goes straight to the relevant team.
- A weekly spreadsheet of the numbers of forms submitted which includes times and dates; what type of form was submitted; whether it was successfully sent; what Force area the request was made etc. This spreadsheet is entirely anonymous (contains no personal data) and is to help us understand demand and website usage.



2. If information is obtained above and retained is this shared with any other policing bodies or government authorities and if so is there a force policy or document that refers? may I have a copy?

There is not a specific Force policy on obtaining, retaining or sharing of metadata, MAC addresses, email addresses or other similar information relating from FOI requests. If we did obtain and retain such information, it would be done so in line with the Data Protection Policy, UK GDPR and the Data Protection Act 2018.

3. What is the Force Policy on data retention and disposal related to the above?

Data Protection Policy

This policy covers the retention and disposal of personal data, including any data relating to an identified or identifiable natural person such as meta data, MAC addresses, email addresses etc. The policy applies to all data collated and held by Wiltshire Police and is not specific to any data that may be collected from Freedom of Information requests.

4. How many databases are maintained or used by your Police? and what are they called and a brief description of their use would be helpful?

Wiltshire Police utilise 136 databases. However, disclosing the names of these databases is exempt under the Freedom of Information Act 2000 by virtue of the following exemptions:

- Section 31(1)(a)(b) – Law Enforcement
- Section 38(1) – Health and Safety

Sections 31 and 38 are prejudice-based, qualified exemptions and therefore require Wiltshire Police to establish the harm in disclosure, along with the public interest favouring and against disclosure.

Overall Harm in Disclosure

Disclosing this information into the public domain would undermine the core principles of policing, namely to prevent and detect crime. Placing the names of the databases utilised by the Force into the public domain could cause substantial harm, as this would prejudice our ability to prevent and detect crime, and to apprehend and prosecute offenders. This is because information would be provided to offenders which will allow them to evade detection and therefore will affect the Force's ability to protect the community, which in turn would affect the trust the public have in the Force.

Public Interest Test

Section 31

Factors Favouring Disclosure

Placing this information into the public domain would allow for greater transparency between the Force and the public regarding the work conducted by the Force. In turn, this may lead to a reduction in crime or more information being supplied by the public. Disclosure would also ensure that Wiltshire Police can be held accountable for the actions taken, and show the Force as being as open and transparent with the public as possible.

Factors Against Disclosure

Disclosing the names of the databases utilised by the Force would hinder the prevention and detection of crime, resulting in investigations becoming compromised. Offenders would be able to gain valuable information from this disclosure; i.e. they could establish whether there are any weaker areas within the databases and attempt to infiltrate these which, if successful, could potentially lead to access being gained to other databases used by the Force. This would assist them in evading capture and, by doing so, the public would be placed at a greater risk. In turn, trust in the Force would diminish and an increase

in crime would be seen. Additionally, the disclosure of the database names may reveal information sensitive to operations and tactics used, therefore severely impacting the Force's resources as well as strengthening the possibility for offenders to evade capture.

Section 38

Factors Favouring Disclosure

Disclosing this information would allow for better awareness for the wider community in relation to the inner workings of Wiltshire Police. This may have a positive impact on the public reporting information to the Force, thus allowing the Force to protect the public more efficiently. This would also show the Force as being open and transparent with the public.

Factors Against Disclosure

Disclosing the names of the databases utilised by the Force is likely to place the safety of individuals within the Force, as well as members of the public, at risk. If these databases are infiltrated, countless amounts of information - whether this is personal data, information relevant to sensitive operations or police tactics [i.e. undercover operations] etc - will be at risk, thus jeopardising the safety of numerous individuals.

Balance Test

Wiltshire Police are charged with enforcing the law, preventing and detecting crime and protecting the community we serve. Whilst it is appreciated there is a public interest in the Force being open and transparent with the public, there is a stronger interest in ensuring the public are protected from the threat of criminals and that the enforcement of the law and the prevention and detection of crime is upheld. Disclosing information which is likely to assist offenders would seriously undermine integrity of the Force and the effective delivery of operational law enforcement, and is therefore exempt from disclosure.

Please note: There is no obligation on an Authority to create data - for example, brief descriptions of a database's use - where it does not currently exist, solely to answer an FOI request. If information were to be created for disclosure, there is the likelihood the information may exercise additional exemptions under the Freedom of Information Act.

5. How many people are employed by your force to process and deal with Freedom of Information Act requests? what is the annual cost to the force in processing Freedom of Information Act requests?

The number of staff funded = 13 posts, 12 full time equivalent (as two posts are part time)

We are only able to provide the figures for our financial years (Apr-Mar).

Staffing budget including on costs for 21/22 = £411,905

Staffing budget including on costs for 20/21 = £402,211

6. Does your force operate a disclosure log of Freedom of Information Act requests? if so can I have a link to the relevant web address? if you do operate a disclosure Log what is the criteria for disclosure of Freedom of Information Act requests online on the internet.

Yes – Wiltshire Police 'Published Items' page ([link](#))

There is no criteria for what requests are included within the disclosure log.

7. Does your force have any statistics on the number of Freedom of Information Act requests received and the number processed within the time limit or delayed for example.

Yes

8. How many Freedom of Information Act requests in the last 12 months have been referred to the National Police Freedom of Information Act and Data Protection Act Unit by your Police Force?

Total referrals since 1st July 2021 (to date) – 179

Please note: This figure will include referrals made by other Forces (which have then been confirmed as an FOI request received by Wiltshire Police), advice which has not officially been circulated (i.e. has been provided via email) and requests which have referred back to previous advice for similar requests.

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

Abigail Standidge
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.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 Fol 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/>