

**Force Disclosure Unit**

Wiltshire Police HQ

London Road

Devizes

Wiltshire

SN10 2DN

Tel 101 ext 62005

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

XXXXXX – by email

Date: 8th March 2023

Your ref: FOI

Our ref: FOI 2023 / 201

Reply contact name is: Nick Penny

Dear XXXXXX,

I write in connection with your request for information dated 8th February 2023 concerning Child Criminal Exploitation.

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 not obliged to supply the information you have requested.

You wrote:

I am conducting a scoping review that aims to bring together knowledge of existing Police practices for identifying and responding to child criminal exploitation. Through this research, I am hoping to provide an overview of good and emerging practices across the United Kingdom. My findings will be compiled into a summary report which I am happy to share with your organisation.

I am emailing to request published or unpublished literature from your Police force that focuses on identification and response to child criminal exploitation. For example;

- Practices for managing child criminal exploitation inquiries, reports, or cases.
- Strategies used by police forces (or partner agencies) to identify potential child criminal exploitation victims and methods to record these (including any flags which are commonly highlighted in CCE cases).
- Strategies used by police forces (or partner agencies) to respond to evidence of child criminal exploitation.
- Multi-agency (local authority, social services, care homes, accommodation, charities) identification, reporting, and response to child criminal exploitation.



INVESTOR IN PEOPLE

Our response:

The information that you are requesting for the majority of your request is not stored in a way which permits easy retrieval.

Wiltshire Police do not have a specific policy in relation to Child Criminal Exploration and the policing of it is not handled by (or the responsibility of) one specific Team per-se, moreover it is the responsibility of a number of different specialised areas around the Force such as - but not necessarily limited to - the following :-

Exploitation Team

Op Fortitude Team (dealing with County Lines disruption)

Intelligence Team

Volume Crime Teams

Community Policing Teams

I have liaised extensively with the Force Lead for the Exploitation Team and they have advised me that to correlate all the requisite information we hold around the Force and amalgamate it in order to provide an overall tangible explanation of how we – as a Force – tackle CCE would be a very difficult and time consuming exercise. They have also advised that the Exploitation Team themselves are not a focused CCE Team – they are an holistic exploitation team and it is very challenging to separate CCE elements specifically from the rest of their responsibilities.

In addition, we would not be best placed to answer how partner agencies plan their own strategies in this area – this would be better coming from them.

Under the circumstances I am absolutely confident that to locate, retrieve and provide the information you seek would by far exceed the time obligations upon this authority to comply, and in so doing would exceed the fees limits. This is set at £450 calculated at a flat rate of £25 per hour for those work activities comprising of confirming the information is held, locating it, retrieving it and extracting it.

It also needs to be noted that there is no obligation on an Authority to create information where none currently exists today, simply to answer an FOI request – which this would undoubtedly entail in this particular instance.

Although excess cost removes the forces' obligations under the Freedom of Information Act, as a gesture of goodwill I have supplied information, relative to your request, retrieved or available before it was realised that the fees limit would be exceeded. I trust this is helpful to you, but it does not affect our legal right to rely on the fees regulations for the remainder of your request. What I am able to provide you are the following documents – which together – may assist in at least, partly, answering your request. These are as follows :-

- a) Wiltshire Police Child Abuse Policy
- b) Wiltshire Police Missing Persons Policy
- c) Sentinel Team – Terms of Reference
- d) Wiltshire Police – Tracker Document (Flowchart)

Please Note

Were we in a position to be able to physically provide you all the information you are requesting within permitted timescales, I do need to advise you that the vast majority of that information would inevitably have been exempt from disclosure for a number of other reasons under The Act, such as the following :-

Section 23 – Security Matters

Section 24 – National Security

Section 30 – Investigations and proceedings undertaken by public authorities

Section 31 – Law Enforcement

Section 40 – Personal Information

Ordinarily under our section 16 duty to provide advice and assistance, we would advise you how to refine your request to a more manageable level. However, due to the difficulties outlined above, I cannot see how this can be achieved in this particular case.

Section 17 of the Freedom of Information Act 2000 requires the Wiltshire Police, when refusing to provide such information (because the information is exempt) to provide you the applicant with a notice which: (a) states that fact, (b) specifies the exemption in question and (c) states (if that would not otherwise be apparent) why the exemption applies.

The exemption applicable to the information requested is:

Section 12: Exemption where cost of compliance exceeds appropriate limit

- (1) Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit.

In accordance with section 17 of the Act, this letter represents a Refusal Notice for this particular request.

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,

Nick Penny
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