



Police Headquarters
London Road
DEVIZES
Wiltshire
SN10 2DN
disclosure@wiltshire.police.uk

Date 9th October 2023

Our ref **FOI 2023/806**

Dear *****,

I write in connection with your request for information dated 11th August 2023 concerning Procedure for vetting of transgender people.

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 Force Policy Office and the Vetting Unit at Wiltshire Police.

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

You wrote/ Our Response:

Please provide the following information and provide copies of documents and/or forms where available:

1 What is your process or procedure for vetting of transgender people? Please provide documentation setting out the process/procedure.

Our process and procedure for vetting is the APP Vetting Policy (which can be found online at: [Vetting | College of Policing](#)) and this applies to both transgender people and non-transgender people. We don't have a separate procedure for the vetting of transgender people.

1.1 Do you have a separate and/or confidential vetting process or procedure available for transgender people?

No information held – We don't currently have a confidential vetting procedure or process for transgender people.

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1.2 Do you require a person's gender history to be disclosed as part of vetting?

Yes

1.3 Is the Protected Characteristic of sex (registered at birth) recorded and maintained for all officers and staff on their vetting file?

Yes – and person who has gone through transition will have 2 separate records.

1.4 Is the Protected Characteristic of sex (registered at birth) recorded and maintained for all officers and staff on their employment file?

Yes

1.5 When you request a reference for a person who you know to be transgender, will you make the request using only the prospective colleague's name and gender since transitioning, or will you also provide previous names and gender(s) that are known to you?

We would make the request using the name that the applicant applied with.

1.6 Where a reference request is received (from another force or employer) for an existing colleague who has transitioned their gender, will you provide their full gender and name history to the prospective employer?

No, we would provide details regarding their dates of employment and their role and reason for leaving.

1.7 Name and gender records are held on the Police Elimination Database (PED) with the content of these fields being that which was originally detailed by the person when they gave the DNA sample unless subsequently amended. Do you have a process for amending the details on the PED so that the name and gender records of an employee who transitions during your employment can be changed? Please provide documentation setting out the process.

Fingerprints

The name is annotated on a member of staff's fingerprints and recorded on the local PED (Police Elimination Database) on IDENT1 (National Fingerprint System). Gender is noted on our local system (Biometric Sampling System) but not stored on IDENT1.

DNA

Whilst the name is annotated on a member of staff's DNA card when DNA is taken, no name is recorded on the CED (Contamination Elimination Database) of DNA samples. The DNA sample is referenced using a barcode, date of birth and collar number, none of which is gender related. The barcode is linked to the fingerprints taken for the same individual.

No gender is requested during the DNA sampling process, however, during profiling, gender will be determined.

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We receive communication from HR when a person has changed their name during their employment with Wiltshire Police. When we receive such notification, we amend the demographics held on our local records accordingly.

I am satisfied that all the relevant information has been passed to me and I apologise for the delay in answering your request.

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

Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

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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

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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/>