

**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 E Mail

Date: 2nd November 2023

Your ref: FOI

Our ref: FOI 2023 /1004

Reply contact name is: Nick Penny

Dear XXXXXX,

I write in connection with your request for information dated 17th October 2023 concerning Sex Worker Liaison.

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 PPD Team - I am not able to respond to you in full.

You wrote (and Our Response) :

Q1: Do you have an individual officer/team/unit dedicated to sex worker liaison work - aimed at supporting sex workers who are victims of crime/vulnerable? **Yes**

Q1a: If yes, what is the role/team/unit called?

Adult Exploitation Officers work for a Team called Sentinel at Wiltshire Police

Q1b: Under what strategic or operational unit does the officer/team/unit sit?

Public Protection Department

Q1c: Is the role operational across the whole force or only in specific areas?

The roles cover the entire Force area

Q1d: If only in specific areas which?

N/A



Q2: How many officers (FTE equivalent) work in these roles/teams/units?

The answer to this question is exempt under Section 31 of The Act – see later notes.

Q2a: Are these officers/teams/units exclusively dedicated to Sex Worker Liaison work or do they have other responsibilities?

All the Officers in the Sentinel Team are dedicated to this area / work

Q2b: If they have other responsibilities please list them here.

N/A

Q2c: How many sex workers do these roles/teams/units work with across a year? (1-50; 50-100; 100-200; 200+; we don't keep a record)

Currently 24 in Swindon, 7 in the rest of the county

Q2d: Which sex work populations do they mainly work with? (on-street/indoor/online/migrant/across all sex work populations)

Most of the Sex Workers are traditional on-street workers but following Covid have now moved indoors with regular customers.

Q3: Do you have a role profile/job description for this role? **Yes**

Q3a: If yes, was this role profile published by the NPCC, College of Policing or University of York or was it produced locally?

No

Q3b: If locally produced, could you please attach a copy of the role profile/job description?

The Job Description below is from a recent advert for one of these roles :-

Adult Sexual Exploitation Officer within the PPD Sentinel Team

An opportunity has arisen for Police Constables (PIP1) across the force who have completed their probation to fill the post of Adult Sexual Exploitation Officer within the PPD Sentinel Team, this role will be supporting those subject to ASE and to divert them from sex work. The successful post holder will help develop and expand the role across the whole force area. Whilst the team predominantly work out of Swindon, there is a need to travel and work force wide.

The post holder will work together with partner agencies to reduce the risk presented to those subject to/vulnerable to ASE by effectively monitoring their activities and offering help and support to reduce their vulnerability. You will act positively to protect those subject to ASE from serious harm through the identification, analysis and management of risk posed and provide advice and guidance to investigators on the targeting and prosecution of those who use their services and those who control or manage those subject to ASE.

You will have responsibility to complete detailed risk assessments of those at risk and support outreach work to assess vulnerability and promote safe working practices. Highlighting to partner agencies changes in risk factors to ensure appropriate action is undertaken to reduce risk factors. In addition, you will have responsibility for the management of pro-active operations and initiatives, to target those who use the services of sex workers.

The successful candidate will already be a substantive Police Constable who is able to work flexibly in an unpredictable environment. The candidate will be required to compile detailed risk assessments, written reports and statements of evidence. They will need strong communication and negotiation skills to represent Wiltshire Police in partnership meetings.

The post holder will ensure that safeguarding measures are addressed in respect of those subject to or at risk from ASE and their families. Working with partners, the post holder will complete risk management plans to address how to reduce or manage the risk of harm and the likelihood of re-offending activities, utilising the reducing offending pathways.

The successful candidate will require effective communication skills and the ability to display professional detachment when dealing with sensitive and potentially disturbing information. You will have experience of managing risk and investigating offences.

The core shift pattern for this role is Monday – Friday 0800-1600; however, applicants must have a flexible approach to working, with the knowledge and expectation that evening and weekend working will occasionally be required to meet operational demand.

Q3c: At what grade is the role positioned?

PC

Q4: With which partner agencies do these officers/teams/units work most closely? [Please list top 5]

Nelsons Trust
Change Grow Live
NHS Sexual Health
Swindon Borough Council Housing and Homeless Department
Probation

Q5: With which other police units/teams do these officers/teams/units work most closely? [Please list top 5]

Community Policing Teams (CPT's)

Sentinel – Missing Persons Team

CID

Fortitude Team (Threat, Harm, Risk)

Front-line Response Officers

Please Note

Details regarding the number of specific officers working in the Sentinel Team at Wiltshire Police is exempt under Section 31 – Law Enforcement.

Section 31 is a qualified and prejudice-based exemption and therefore requires Wiltshire Police to establish the harm in disclosure, along with any public interest arguments for and against disclosure. Please see the harm and public interest tests below.

Section 31 Harm and Public Interest Test

Overall harm

Disclosing details of the number of dedicated Officers working in our Sentinel Team could have an adverse effect on the ability of the Force to effectively prevent and detect crime and also protect the vulnerable.

Factors favouring disclosure

Disclosing this information would ensure Wiltshire Police are being open and transparent with the public. This would also ensure that the Force can be held accountable for its actions. Disclosure would also provide the public with an insight into the financial resources of the Force, as we are publicly funded, and how this is being utilised.

Factors against disclosure

If this information were to be disclosed to the public, investigations would be compromised thus hindering the Force's ability to prevent and detect crime and also protect the vulnerable in society. Disclosure of any information relating to the number of specific Officers working in the Sentinel Team at Wiltshire Police would allow offenders to gain valuable information about the Force's tactical capabilities. Knowing the number of dedicated Officers in this Team would assist them in evading capture, putting the greater public (not to mention the vulnerable) at risk and would result in trust in the Force being lost, and an increase of crime being seen.

Balancing test

The Force is charged with enforcing the law, preventing and detecting crime and also protecting the vulnerable in society. Whilst there is a strong public interest in transparency between Wiltshire Police and how we engage with the threat from criminals and also how we try to keep people safe, there is a stronger public interest in safeguarding the public and protecting the Force's ability to effectively prevent and detect crime. Disclosing information which is likely to assist offenders or put vulnerable people at risk would seriously threaten the effective delivery of operational law enforcement and public protection.

The arguments for and against disclosure of this information are both strong, but the stronger of the two lies in favour of non-disclosure. This information is therefore exempt under Section 31 – Law Enforcement.

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 31(1)(a)(b) Law Enforcement

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