

**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: 13th August 2025

Your ref: FOI

Our ref: FOI 2025 / 782

Reply contact name is: Nick Penny

Dear XXXXXX,

I write in connection with your request for information dated 10th August 2025 concerning Pride.

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

- 1) Copies of the original quality photos and videos taken at the public Pride event in Wiltshire/Swindon over the weekend of 9th/10th August by police officers and staff or that are otherwise in the possession of Wiltshire Police. I understand these are likely to have been captured by officers and staff who attended - including within the Chief Officer Group, Communications and Engagement team and/or within the force's LGBTQ+ Network.
- 2) Copies of any correspondence or documents relating to the force's involvement in the Pride event in Wiltshire/Swindon over the weekend of 9th/10th August - plus any joining instructions or guidance that was issued to officers/staff/cadets on email or otherwise in writing regarding the event.
- 3) Any correspondence or documents relating to any assessment(s) made by the force in relation to participation in Wiltshire/Swindon Pride (or events and conduct more generally) following the high profile High Court judgment of Smith, R (On the Application Of) v The Chief Constable of Northumbria Police [2025] EWHC 1805 (Admin) (16 July 2025).



INVESTOR IN PEOPLE

Our response:

The information that you are requesting for the majority of your request (namely questions 2 and 3) is not stored in a way which permits easy retrieval.

To locate this information would necessitate searches of our E Mail server and internal intranet system(s). This is done using Microsofts' E-Discovery application.

I have undertaken a search of this content for the occurrences of the word "Pride" in E mails or on our internal systems – for the period March 1st 2025 to date this has returned in excess of 68,000 individual records.

To ascertain the information you require, it would be necessary to open and review each and every one of these documents in order to determine whether it met your criteria or not.

Given the sheer volume of material involved, I am absolutely certain that to locate, retrieve and extract 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.

Please also note that if one part of the request engages a Section 12 response, the whole request will engage a Section 12 response. The reason being is due to the fact that locating, retrieving and extracting any further information would only add to the already exceeded time obligations.

However, 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, 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 answers documented below :-

Question 1

This information is exempt from disclosure under Section 40 of the Act covering Personal Information.

Section 40 is a class based absolute exemption, for that reason there is no requirement to articulate the harm in disclosure or a requirement for the public interest test, however I am happy to provide some context here.

Anyone attending such an event does so of their own volition and choice. Their attendance does not automatically mean they consent to their images being displayed or release to the public etc.

There may be some images and/or clips that have been made available on social media platforms – if so, these will have been deemed not to be in contravention of any 3rd party or human rights considerations etc, or are likely to have been published having obtained the explicit consent of those involved/featured or, indeed, are the personal property of the taker.

Questions 2 and 3

Wiltshire Police do not currently have any formalised Procedural Document or specific Policy Document in relation to Pride Events, nor is it featured as a sub-section or addendum to any current policy document.

That said, I have liaised with both our Press Office and the Gold Group Lead for the Pride Event, both of whom are happy to provide the following specific information in support of your request :-

Press Office

- We placed the following post on Facebook regarding the event :-

[\(20+\) Facebook](#)

- We also put a reel on Instagram. Both these social media accounts include photos.
- We also issued a statement to Wiltshire 999 on August 11:

Superintendent Conway Duncan said, "Following the recent High Court ruling, a policy decision was made that on-duty attendance at the Swindon and Wiltshire Pride march was only permitted for officers and staff where it forms part of the official policing response.

Regarding the Swindon Pride event which followed the march, as this was attended by approximately 10,000 people, our officers were rightly undertaking their roles – including community engagement - in a visible capacity both inside and outside the event.

Members of the Wiltshire Police LGBTQ+ Staff Support Network were in attendance at the event in a voluntary, off-duty, non-uniform capacity to represent the network and engagement with the community."

Regarding the mission statement of Swindon and Wiltshire Pride, you can find this in the link below but, in summary, it is focused on community and celebrating diversity :-

www.swindonwiltshirepride.org.uk/our-impact

Gold Group Lead

Our current Force position regarding the attendance of Police Cadets at Pride events is to allow the cadets to attend the event subject to the same restrictions that are in place for Wiltshire Police staff, which is as follows and published internally for all Officers and Staff to read :-

News for all: Attendance at Pride

Conway Duncan
Superintendent Crime and Standards

2 min read

Dear Colleagues,

Supporting all the communities we serve is a central part of our organisation.

This is why Wiltshire Police remains a sponsor of the Swindon and Wiltshire Pride event – an important celebration of the LGBTQ+ community which attracts more than 10,000 people each year. Additionally, since 2024, a member of the Chief Officer Group has attended each Pride event held in our county.

However, many of you will be aware of a recent judgement regarding Northumbria Police's attendance at the Northern Pride march.

The judgment followed a challenge to a force decision in 2024 to allow off-duty officers to attend the Northern Pride march in uniform. It was found that Northern Pride, the organiser of the event, should be considered as a political movement due to its strong advocacy for changes in law and policy relating to gender ideology and transgender rights. Participation in Northern Pride 2024 was therefore deemed contrary to the uniformed officers' duties of impartiality.

As such, this year, Northumbria Police made a determination that no uniformed officers, staff or volunteers should attend the march.

*Following this (and similar decisions from other Forces), we have determined that **on-duty attendance at the Swindon and Wiltshire Pride march is only permitted for officers and staff where it forms part of the official policing response. Officers and staff attending in this capacity must be in uniform and follow our usual standards of conduct and impartiality.***

Members of the Wiltshire Police LGBTQ+ Staff Support Network will be in attendance at the event in a voluntary, off-duty, non-uniform capacity to represent the network.

If anyone has any questions, please contact Chief Inspector Al Lumley, who is silver, or myself.

Thank you,

Supt Conway Duncan
Gold Commander

Our stance is always in accordance with advice & guidance provided by the National Leads with the following 3 points considered as follows :-

- There is no indication of an increased physical risk to our staff (including cadets) attending the event. However, we will continue to monitor incoming intelligence.
- The risk appears to be a reputational one, centred around public perception and the desire to be seen as unbiased, as highlighted in the high court ruling.
- Wiltshire Police have a history with the event and utilise it as a public engagement opportunity.

The following formal guidance was also issued to all Wiltshire Police employees via our internal E-Brief newsletters :-

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Thank you,

*Supt Conway
Gold Commander*

Ordinarily under our section 16 duty to provide advice and assistance, we would advise you how to refine your request in respect of questions 2 and 3 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 exemptions applicable to the information requested are:

- Section 12(1): 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.
- Section 40(2) Personal Information
This exemption covers the personal data of third parties (anyone other than the requester) where complying with the request would breach any of the principles in the UK GDPR.

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