

**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: 18th September 2025

Your ref: FOI

Our ref: FOI 2025 / 714

Reply contact name is: Nick Penny

Dear XXXXXX,

I write in connection with your request for information dated 25th July 2025 concerning VAWG.

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:

Under the Freedom of Information Act 2000, I am requesting the following information:

- 1 The current versions of your internal policies and/or procedures relating to:
 - a) Violence Against Women and Girls (VAWG)
 - b) Child Sexual Abuse (CSA)
 - c) Child Sexual Exploitation (CSE)
 - d) Safeguarding of vulnerable adults and children
 - e) Victim communication, trauma-informed approaches, and victim engagement
- 2 Any internal guidance issued to officers regarding:
 - a) Victim withdrawal of support and No Further Action outcomes



INVESTOR IN PEOPLE

- b) The Victim's Right to Review (VRR) process
- c) Supporting survivors with complex trauma, neurodivergence, or language barriers

3 If applicable, your local implementation strategy or action plan relating to:

- a) The NPCC VAWG strategic framework
- b) Operation Soteria Bluestone
- c) Public confidence or trust-building plans with survivors of sexual violence

If any of these documents are not available, please confirm whether such policies or guidance exist.

Our response:

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

However, rather than exempt a response to you completely under Section 14 of The Act – on the grounds that for this Authority to provide a full response to you it would be considered onerous and/or burdensome – I would rather, and under our Section 16 duty to be as helpful as possible to an applicant, provide you what we can within time limits.

A lot of the information held in respect of either Training Documentation is not Wiltshire Police documentation and instead belongs to other organisations - such as the NPCC, Home Office and College of Policing – all of whom would need to be contacted and liaised with to permit disclosure (or redacted partial disclosure) of material which is a very time-consuming exercise.

Similarly, with regards to Q3 of your request - concerning Implementation Strategies and Operational Plans – there is a wealth of material held, all of which would need to be compiled, reviewed and redacted to ensure that anything sensitive was not disclosed. I have been advised by the Chief Inspector who has oversight of the VAWG Program that this would be a very time-consuming exercise and I should also advise that – even if we were able to undertake this task in the time permitted - the vast majority of information would be exempt from disclosure under other sections of the Act such as the following :-

- Section 23 National Security
- Section 31 Law Enforcement
- Section 40 Personal Information

Under the circumstances I am absolutely confident that to locate, retrieve and provide all of 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 – and under our Section 16 duty to be as helpful as possible to an applicant – 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

a. Violence Against Women and Girls (VAWG)

We do not have a single policy document relating to Violence Against Women and Girls. There are a number of policy documents that apply :-

Child Abuse Procedure (see attached)

[Child Sexual Exploitation Policy \(APP\)](#) (Link to College of Policing APP adopted as Force policy)

Domestic Abuse Policy and Procedure (see attached)

Honour Based Abuse (HBV) Policy (see attached)

Non-Contact Sexual Offences Policy (see attached)

R.A.S.S.O (Rape and Serious Sexual Offences) Policy (see attached)

Stalking and Harassment Policy and Procedure (see attached)

b. Child Sexual Abuse (CSA)

Child Abuse Procedure (see attached)

c. Child Sexual Exploitation (CSE)

Child Sexual Exploitation Policy (APP) – link supplied above

d. Safeguarding of vulnerable adults and children

See answer to a above.

e. Victim communication, trauma-informed approaches, and victim engagement

See answer to a above.

Question 2

I have provided you with 6 Powerpoint Presentations (Wiltshire Police documents) which form part of the Training offered to officers. These presentations cover the following :-

- Impact of Trauma on memory

- Hierarchical Crime Review
- Horizon Program
- RASSO
- Victim Right to Review
- Victim Right to Review - Research

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 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