

**Force Disclosure Unit**

Wiltshire Police HQ  
London Road  
Devizes  
Wiltshire  
SN10 2DN  
Tel 101 ext 62005

[www.wiltshire.police.uk](http://www.wiltshire.police.uk)

[disclosure@wiltshire.pnn.police.uk](mailto:disclosure@wiltshire.pnn.police.uk)

XXXXXX – by E Mail

Date: 18<sup>th</sup> September 2025

Your ref: FOI

Our ref: FOI 2025 / 785

Reply contact name is: Nick Penny

Dear XXXXXX,

I write in connection with your request for information dated 11<sup>th</sup> August 2025 concerning DPIA's.

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 Data Protection Team - I am now able to respond as follows.

**You wrote:**

A complete list of Data Protection Impact Assessments produced by your force in the past five years.

**Our response:**

DPIA for SWIFT dated 13<sup>th</sup> August 2020  
DPIA for ITSM - HALO dated 28<sup>th</sup> August 2020  
DPIA for E Safe dated 13<sup>th</sup> July 2021  
DPIA for Unit 4 (ERP) dated 4<sup>th</sup> October 2021  
DPIA for Centrik dated 20<sup>th</sup> October 2021  
DPIA for FCIU Laser Scanner dated 9<sup>th</sup> December 2021  
DPIA for MS Whiteboard (O365 IG) dated 19<sup>th</sup> January 2022  
DPIA for PR Gloo (Force) dated 7<sup>th</sup> March 2022  
DPIA for MADE dated 15<sup>th</sup> March 2022  
DPIA for Pronto dated 23<sup>rd</sup> March 2022  
DPIA for Mitie dated 28<sup>th</sup> March 2022  
DPIA for NDQIS dated 13<sup>th</sup> April 2022  
DPIA for Victim Focus (VAWG Research) dated 24<sup>th</sup> May 2022  
DPIA for Photogrammetry dated 9<sup>th</sup> September 2022



INVESTOR IN PEOPLE

DPIA for Get The Data dated 15<sup>th</sup> November 2022  
DPIA for LEDS Drivers dated 29<sup>th</sup> November 2022  
DPIA for Anaconda dated 7<sup>th</sup> February 2023  
DPIA for NIAMS dated 10<sup>th</sup> February 2023  
DPIA for LEDS property dated 17<sup>th</sup> February 2023  
DPIA for APSP dated 24<sup>th</sup> March 2023  
DPIA for Odessey Project dated 7<sup>th</sup> August 2023  
DPIA for CCTV Van dated 16<sup>th</sup> August 2023  
DPIA for Swipedon dated 21<sup>st</sup> August 2023  
DPIA for AMPED dated 21<sup>st</sup> August 2023  
DPIA for Buddi dated 19<sup>th</sup> September 2023  
DPIA for FCIU fleet checker dated 17<sup>th</sup> October 2023  
DPIA for UK Telematics dated 13<sup>th</sup> November 2023  
DPIA for Airbox (Mosaic) dated 27<sup>th</sup> November 2023  
DPIA for HandsonHQ dated 13<sup>th</sup> December 2023  
DPIA for Microsoft Redaction Tool dated 15<sup>th</sup> December 2023  
DPIA for The Appropriate Adult Service dated 27<sup>th</sup> February 2024  
DPIA for LEDS dated 13<sup>th</sup> March 2024  
DPIA for Doc defender – Riven dated 20<sup>th</sup> March 2024  
DPIA for ERP Phase 2 dated 2<sup>nd</sup> April 2024  
DPIA for Send Evidence – Digital Rebels dated 9<sup>th</sup> April 2024  
DPIA for Blue Prism dated 3<sup>rd</sup> May 2024  
DPIA for TecSAfe dated 18<sup>th</sup> June 2024  
DPIA for Retrospective facial recognition dated 28<sup>th</sup> June 2024  
DPIA for GoodSam – Rapid Video Response dated 1<sup>st</sup> July 2024  
DPIA for WCCTV CCTV dated 2<sup>nd</sup> July 2024  
DPIA for Clio dated 10<sup>th</sup> July 2024  
DPIA for FCIU Laser Scanner dated 15<sup>th</sup> July 2024  
DPIA for Oleeo dated 19<sup>th</sup> July 2024  
DPIA for Community Messaging dated 19<sup>th</sup> July 2024  
DPIA for PIX4DMatic dated 29<sup>th</sup> July 2024  
DPIA for Intel Portal dated 5<sup>th</sup> August 2024  
DPIA for Probation dated 22<sup>nd</sup> January 2025  
DPIA for SWAP dated 10<sup>th</sup> March 2025  
DPIA for CRASH dated 11<sup>th</sup> March 2025  
DPIA for Avepoint dated 26<sup>th</sup> March 2025  
DPIA for PADDS (Police Authorised Data Downloads) dated 10<sup>th</sup> April 2025  
DPIA for Arctic Shores dated 6<sup>th</sup> May 2025  
DPIA for Collison Sciences (FCIU) dated 15<sup>th</sup> May 2025  
DPIA for FCIU Laser Scanner dated 2<sup>nd</sup> June 2025  
DPIA for OHU referral system (OHU) dated 6<sup>th</sup> June 2025  
DPIA for DISC (Rural Crime) dated 19<sup>th</sup> June 2025  
DPIA for Drones (2025 review/update) dated 7<sup>th</sup> August 2025  
DPIA for Clear Vehicle Data dated 12<sup>th</sup> August 2025  
DPIA for LiDAR using DJI Zenmuse L2 and Terra dated 13<sup>th</sup> August 2025

Wiltshire Police neither confirms nor denies that it holds any other information relevant to this request by virtue of the following exemptions:

**Section 24(2) - National Security**  
**Section 31(3) - Law Enforcement**

Sections 24 and 31 are prejudice based qualified exemptions, both evidence of harm and public interest to be carried out.

## **Evidence of Harm:**

Confirmation or denial that any other information is held would identify local level activity regarding data, its management and any relevant assessments that protect this data. In turn this risks identifying the areas that Wiltshire Police may or may not be applying Data Protection Impact Assessments. This would reveal information which could be used to build a picture as to where national and local investigations and operations, along with their processes and systems, are being undertaken, and perhaps more pertinently where they are not. This mapping effect, created by forces either confirming information is held and citing a substantive exemption or, conversely, stating 'no information held', would undermine the effective delivery of operational law enforcement by revealing the intelligence picture of the force in respect of Data Protection and how it is managed as well as compromising potentially ongoing investigations, some of which may be covert.

Disclosure of information under the Freedom of Information Act 2000 (FOIA) is considered a release to the world at large and not a private transaction. Whilst not questioning an applicant's motives in this case, by making a public disclosure under FOI, it must be considered that as well as members of the public, criminals, including terrorists will be able to access the data released. It is widely known that organised criminal gangs and those involved in terrorist related activity monitor FOI disclosures closely for any information they can use to further their criminal activity.

The threat from terrorism cannot be ignored. It should be recognised that the international security landscape is increasingly complex and unpredictable. The UK faces a sustained threat from violent terrorists and extremists. Since 2006, the UK Government have published the threat level, based upon current intelligence that threat level to the UK currently is 'substantial, meaning an attack is likely.

<https://www.mi5.gov.uk/threat-levels>

Any information identifying the focus of policing activity and how they protect and manage data could be used to the advantage of criminal organisations, serious and organised crime groups and terrorists to undermine the operational integrity of policing will adversely affect public safety and have a negative impact on, not only law enforcement at a local level, but policing and operations at a national level, the impact of which risks the national security of the UK.

## **Public Interest Considerations**

### **Section 24 (2) National Security**

#### *Factors favouring complying with Section 1(1)(a)*

Any information that would increase public knowledge in showing how resources are allocated in response to events would favour confirming whether anything else was held or not. This would also support the fundamental purpose of the Freedom of Information Act, which is to be more open and transparent in the way in which the police perform, making them more accountable for their actions. Releasing any details regarding Wiltshire Police's current Data Protection Impact Assessments would provide reassurance to the public that the police are appropriately resourced in this area and would be in a position to respond to any National Security threats or data breach incidents, along with protecting data of every individual with their force area. Any information which would allow for more accurate public debate would be a positive factor for disclosure.

#### *Factors against complying with Section 1(1)(a)*

Whilst there is a public interest in providing reassurance that the police are appropriately and effectively dealing with threats posed by terrorist organisations, there is a strong public interest in safeguarding national security and the welfare and safety of the general public, including all forms

of personal data. Any disclosure (including confirming or denying information is held) has the potential to undermine ongoing and future operations to protect the Security of the United Kingdom, e.g. counter terrorism activity, both nationally and locally. The risk of significant harm or even death to the community at large would be increased.

The cumulative effect of terrorists gathering information from various sources would build a picture of potential vulnerabilities at a local level. The more information disclosed over time will provide a more detailed account of the investigative focus of not only a force area but also the country as a whole. Any incident which results from such a disclosure would by default affect National Security.

### **Section 31(3) Law Enforcement**

#### *Factors favouring complying with Section 1(1)(a)*

To confirm or deny that any other information is held would make members of the public more aware of the threats and the forces ability to deal with them. Improved public awareness may lead to more intelligence being submitted to police about possible further instances regarding personal data and any acts of criminality or perceived terrorism as members of the public will be more observant to suspicious activity which in turn may result in a reduction of crime.

#### *Factors against complying with Section 1(1)(a)*

To confirm or deny that any other information is held could compromise law enforcement tactics which would hinder the Police force's ability to prevent and detect crimes. Whilst such information on its own may be perceived as not harmful, any further information that may be already in the public domain or any that may be asked for in the future could be detrimental to forces and can contribute to the mosaic effect. The 'mosaic' effect is attune to the building up of a jigsaw, from public disclosures and other information, gradually filling in the pieces to form a complete picture. For criminals, including serious and organised crime groups and terrorists to gain easy access to such information, including data for intelligence purposes, along with everyone's personal data would not only undermine the police's primary function of law enforcement but also place the public at significant risk of harm.

### **Balancing Test**

Wiltshire Police is charged with enforcing the law, preventing and detecting crime and protecting the communities we serve. The security and maintenance of investigations are of paramount importance and Wiltshire Police will not divulge whether any other information is or is not held. Whilst there is a public interest in the transparency of policing and providing assurance that the police service is appropriately and effectively engaging with the threat from criminals, there is a very strong public interest in safeguarding the integrity of police investigations.

It is therefore our opinion that for these issues the balancing test for confirming or not that information is held, is not made out.

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](mailto: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](mailto:mail@ico.gsi.gov.uk)