

**Force Disclosure Unit**

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

www.wiltshire.police.uk

disclosure@wiltshire.pnn.police.uk

XXXXXX – by email

Date: 24th October 2025

Your ref: FOI

Our ref: FOI 2025 / 938

Reply contact name is: Nick Penny

Dear XXXXXX,

I write in connection with your request for information dated 2nd October 2025 concerning Modern Slavery and Human Trafficking..

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 liaised with our Business Performance, Intelligence, Fraud and APMIS Teams - 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 aggregated statistical information for your police force area, covering the period 1 January 2019 - present.

For businesses described as "barbers", "hairdressers", "hair salons", "nail bars/salons", or "beauty salons" (keyword search acceptable), please provide:

1. The total number of raids, operations, or enforcement actions involving these business types.
2. The total number of arrests made.
3. The total number of charges brought.
4. The total value of cash or assets seized (if recorded in aggregated form).
5. The total number of referrals made to HMRC, NCA, or Immigration Enforcement.



INVESTOR IN PEOPLE

Following my request for clarification, you confirmed by E mail on 16th October that you were requesting information only on police raids, operations, or enforcement actions relating to human trafficking and modern slavery offences involving barbershops, hair salons, nail bars, beauty salons, or similar businesses and that general attendances or incidents that were unrelated to MSHT should be excluded from our response.

Our response:

The information that you are requesting for the majority of your request is not stored in a way which permits easy retrieval NOR are we able to provide a full picture of what you are requesting here.

Raid or “disruptive actions” can be generated from a number of sources such as (but not limited to the following :-

- A specific report received from a member of the public
- An intelligence picture that has been developed over a period of time
- A request from an outside agency such as NCA, HMRC or Immigration Control (each of whom generally control or hold the investigation rather than us)

Any requests for attendance by officers is normally tasked via an Intelligence Report entered into our crime recording system. An attendance is made any if a given crime has been identified a further crime record is added to our systems.

Since January 2019, we have had 4,719 individual intelligence reports submitted to our systems which have been “flagged” as being related to either Modern Slavery or Human Trafficking. Not all of these will have effected subsequent arrests, but those that had would need to be cross-referenced against a respective crime record on our systems in order to obtain most of the information you are looking for. At this stage I have no idea how many of the above 4,719 intelligence reports resulted in the generation of a subsequent crime record on our systems.

Whilst our crime recording system(s) are fairly sophisticated and we have a number of dedicated fields in which we can record certain specifics about a given crime or incident (such as victim bame, suspect dob, crime category etc) and which we can then – theoretically use – to run searches or pull information from, we do not have fields in which we specifically record the following :-

- a) the business type (eg nail bar, beauty salon)
- b) the values or details of cash and/or assets seized
- c) any subsequent referrals that may have been made to other agencies

The above information (if held) would only be present in either the narrative of the crime / intelligence log or in statements / records of interview or other supportive documents saved on our systems in support of the various case files.

Given the number of Intelligence Reports involved for this time period (4,719), even allowing a very conservative 10 minutes per record to locate, read, cross-reference to any crime logs and then identify and make a record of the information you require, this task would take in excess of 785 man-hours to complete.

Under the circumstances I am therefore absolutely confident 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.

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 is the information below :-

- a) When referrals come to us from other agencies such as NCA, HMRC, Immigration Control etc, they invariably "hold" the master investigation on their system(s) and we would not ordinarily record any information on it. Our part would be purely to provide the manpower to undertake the initial raid or visit to the premises.
- b) Investigations of this nature are often related to cross-border OCG (Organised Crime Group) activity where other Forces take ownership for – and therefore – hold any data related to the MSHT operation, not Wiltshire Police.
- c) I have undertaken extensive discussions with a number of specific Teams around the organisation (such as our Intel, Business Intelligence, APMIS and Modern Slavery Teams) each of whom hold various records related to activity in this area but there is no one Business Area which holds or records the specific information you require. Information on MSHT is held across a number of different database systems or numerous spreadsheets / word documents and so on, most of which would need to be tabulated, cross referenced and so on to obtain the information you require.
- d) Even if we were in a position to be able to produce the requisite information within time/cost limits, certain elements of that information are likely to attract other exemptions such as S31 (Law Enforcement), S23/24 (Security), S30 (Investigations) and S40 (Personal Information) prior to any potential disclosure.
- e) It should also be noted that there is no obligation on a public authority to create information – where none currently exists – simply to answer an FOI request.

Ordinarily under our section 16 duty to provide advice and assistance, we would advise you how to refine your request to a more manageable level. However, due to the difficulties outlined above, I cannot see how this can be achieved in this particular case as even providing information for just one calendar year in isolation would still easily exceed the fees limit in itself.

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