

WILTSHIRE POLICE



Via Email



Police Headquarters
London Road
DEVIZES
Wiltshire
SN10 2DN

Date: 11/02/2026

Our ref: FOI 2025/1193_Internal Review

Reply contact name:

Dear,

I write in connection with your request for information dated 21/01/2026 concerning an internal review into FOI 2025/1193 (Statutory Duty to Investigate Allegations of Corruption and Misconduct)

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 able to respond as follows.

You wrote:

1. FOI Request under the Freedom of Information Act 2000

Please provide all recorded information (internal emails, decision logs, policy references, guidance, memoranda, referrals, escalation notes, complaint logs, Professional Standards records, crime-recording entries and related documentation) held by your force concerning the following:

A. Crime Recording & Investigation of Corruption Allegations

1. Any internal policy or guidance governing how allegations of corruption, collusion, or regulatory misconduct are to be recorded and investigated, including any linked to:
 - Professional Standards Department (PSD)
 - Anti-corruption units
 - Economic Crime Units

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2. Any records of training, guidance, or policy documents referring to the **duty to record and investigate serious allegations**, including those involving public officials, regulated professionals, or persons of special status.
3. Any records relating to the handling of credible allegations of corruption submitted by members of the public, including:
 - o Correspondence acknowledging receipt;
 - o Initial assessments;
 - o Decisions not to record a crime;
 - o Records of rationale for not progressing to investigation; and
 - o Any referrals, internal or external, arising from such allegations.
4. Any records of cross-force information or referrals relating to allegations of corruption or regulatory misconduct involving this force.

If any part of the requested information is held but you claim it is exempt from disclosure under FOIA, please cite the specific exemption and provide a **public-interest justification** for its application.

2. Legal & Professional Obligations

I am also writing to remind your force of the fundamental obligations placed upon all UK police forces to record and investigate allegations of criminal conduct when credible information is presented.

A. Duty to Investigate Crime

Under the **Police Act 1996**, the **Code of Practice for Ethical Policing (issued under section 39A, Police Act 1996)** requires chief officers to lead their forces in upholding ethical and professional behaviour, including actively identifying and responding to misconduct and corruption when it occurs.

While specific statutory text does not contain a single “duty to investigate corruption” clause, it is inherent in UK policing law that:

- Police forces have a duty to **prevent and detect crime** under relevant legislation and common law principles, and to record reported offences in accordance with national standards.
- The **Criminal Procedure and Investigations Act 1996** and associated College of Policing guidance make clear that police officers are obliged to conduct investigations where there is reasonable cause to suspect a criminal offence, to record information and retain relevant evidence.

B. Professional Standards and Accountability

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The **College of Policing's Ethical Code** specifically places responsibility on chief officers to ensure necessary action is taken when staff become aware of misconduct or corruption, not to ignore or suppress reporting.

C. Investigation of Allegations Impacting Public Confidence

Serious allegations of corruption — particularly where they implicate professionals, regulators, or oversight bodies — may engage public confidence and trust obligations. UK policing professional practice contemplates escalation of serious internal or external allegations to Professional Standards Departments and appropriate investigative units.

D. Information Sharing & Crime Recording Standards

Guidance such as the Police Information and Records Management Code of Practice promotes consistent recording and availability of information for policing purposes across UK forces.

Response:

On reviewing your original Freedom of Information request, the response provided and your request for an Internal Review, I uphold the original exemption of Section 12(1) being applied.

To provide some further context, on receiving this Internal Review I liaised with the relevant people / departments who confirmed that Section 12(1) is applicable for questions 3 and 4. This FOI seems to be requesting all records in existence for allegations of corruption, with a specific request for certain data.

There is no way we can supply that in 18 hours. There are no time parameters given by the applicant and we have had thousands since Wiltshire Police began. We do not have everything scanned onto the system and it would take months if not years to provide every document requested on every allegation of misconduct. I note that there is information that could have been provided with the original response which may have provided further context for question 1, as follows:

PSD (Professional Standards Department) and CCU (Counter Corruption Unit) work is governed, recorded, and investigated as per:

The Police Complaints and Misconduct Regulations 2020

Police (Conduct) Regulations 2020

Authorised Professional Practice from the College of Policing. [Professional standards | College of Policing](#)

*Capability Procedure - **Please see the attached PDF***

*Police Staff Discipline Procedure – **Please see the attached PDF***

Home Office Guidance on Professional Standards, Performance, and Integrity in Policing - [Home Office Statutory Guidance 0502.pdf](#)

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We have our own force Complaints and Conduct Management Procedure which aims to reduce the recurrence of public complaints and/or conduct matters at an individual level. It seeks to enable managers to monitor and develop individuals and make early interventions when information suggests that they are attracting a high number of public complaints or conduct referrals, and/or there is a theme or pattern to the complaints or conduct cases recorded. This process is not a disciplinary process with the emphasis on developing and supporting individual performance and reducing complaints and conduct matters.

We do not hold any Force policy covering how allegations of corruption, collusion, or regulatory misconduct are to be recorded and investigated. The Force does follow the HO Statutory Guidance - [Policing professional standards, performance and integrity - GOV.UK](#)

In relation to training given to student police officers, whilst we do provide training on how to investigate crime, this is taught cumulatively across a 24-week course. It feeds into most of the lessons that we teach them; however, we do not provide specific training at this point of a student officer's career regarding the recording and investigation of serious allegations regarding public officials.

Ordinarily under our Section 16 obligation to provide advice and assistance, I would advise you of a way in which to refine your request. However, due to the difficulties as outlined above, I cannot think of a way in which this can be achieved. I have, however, provided links above along with some PDF policies which may be of use to you, as a gesture of goodwill.

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
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

Force 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



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.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

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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

Please note that the ICO's offices will be closed for the foreseeable future and are therefore unable to receive correspondence via post.

If you should wish you contact them, please visit <https://ico.org.uk/global/contact-us/>