

WILTSHIRE POLICE



Police Headquarters

London Road
DEVIZES
Wiltshire
SN10 2DN



XXXXXX – via E mail

Date 30th April 2026

Our ref: FOI 2026-302

Reply contact name is Nick Penny

Dear XXXXXX,

I write in connection with your request for information, dated 17th March 2026 concerning Single-Agency Review Report.

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.

Following receipt of your request, research was conducted by the department of Wiltshire Police.

Your request for information has now been considered, and I am not obliged to supply the information you have requested.

You wrote:

I formally request a copy of the Single-Agency Review Report prepared by ACC Coles.

Response:

The Freedom of Information Act 2000 (FOIA) is primarily concerned with disclosure of information to the public.

Under the FOIA, this request is exempt by virtue of the following exemption:

Section 40(1)(2) - Personal data

Section 40 is a class based absolute exemption and therefore there is no requirement to articulate the harm or conduct a Public Interest test. However, disclosing this information would breach the Data Protection Act 2018, specifically Principle One (Fairness).

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When the personal data relates to the requester submitting the FOI, it will be exempt under Section 40(1); the correct avenue to gather the information would be via a Right of Access request.

Information relating to a third party, constituting personal data is exempt under Section 40(2) of the FOIA. Disclosure of third-party information to the public would contravene the data protection principles set out in Section 34 of the Data Protection Act 2018 and Article 5 of the GDPR.

Whilst there is no obligation on an Authority to provide any rationale or reasons when applying a Section 40 exemption, I am happy to provide some additional context for you.

Section 40 – Personal Information

We can confirm that as a result of information received from a member of the public and other partner agencies and – following a subsequent discussion with that member of the public - a Single Agency report was commissioned by ACC Coles.

As you would expect, the report incorporates the personal data of a number of different individuals involved in the review: the individual that was the subject of the review, those individuals providing input to it, a number of key individuals at partner agencies and also a number of officers involved in various aspects of the investigation and safeguarding process.

We consider that any legitimate interest in disclosure would be outweighed by the interests and rights of the individuals concerned (the subjects of the report).

We would also contest that the various contributors to the content of this Single Agency Review would have a reasonable expectation that their observations and recommendations would not be released verbatim to the world at large as and when it was requested at any time in the future.

Some of the information contained in the review regarding named individuals may be special category personal data and - to the extent it does constitute special category personal data - we do not consider that it can properly be disclosed without explicit consent. We do not have the data subjects' consent and consider that it would be unreasonable for us to obtain it, given the nature of the FOI and subject matter involved.

The Police Service processes personal information in-line with current Legislation, particularly the first data protection principle that states that any disclosure should be lawful and fair. It is therefore difficult to see how the disclosure of personal data in relation to the subjects of this Single Agency Review is either lawful or fair.

We also believe that data protection principles 2 and 3 should also be considered here. These dictate that any disclosure should be for a specified and lawful purpose – in this instance we do not believe there is one – and that the processing of personal data should be adequate, relevant and purpose-limited.

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In addition, we do not consider that we would have a power to disclose this information under common law police powers either. The common law power of police to disclose information to the public at large is where there is a pressing social need to do so for policing purposes. We do not consider that disclosure of the requested information would meet that test.

Similarly, we do not consider that we would have a legitimate interest in disclosure. Our view is that this is not for a policing purpose and that without a power to disclose the information, there can be no question of a legitimate interest arising.

Under our Section 16 obligation to be as helpful as possible to an applicant I am, however, able to confirm the following information to you: -

- Wiltshire Police - via recognised routes - received a report regarding concerns about a member of the public
- As a result of the report received – and subsequent conversations - a Single Agency review was then commissioned by ACC Coles to review both the criminal investigation that had occurred to date (including the criminal justice process itself) and the process & content of information sharing between relevant partner agencies
- Whilst ACC Coles commissioned this review, it was undertaken and produced by our Practice Review Manager.
- This Single-Agency Review involved the setting of appropriate terms of reference, the reviews of processes, the implementation of any new learning and further sharing with various Partner Agencies
- The member of public who reported this issue to Wiltshire Police has been broadly updated by ACC Coles on the relevant findings
- Should Wiltshire Police receive any further reports linked to this review or indeed any other criminal activity, any such allegations will be duly investigated in full. It should be noted, however, that disclosure of any information linked to such reports would likely be exempt from disclosure under various Sections of the FOIA such as Section 30, Section 31 and/or Section 40

Please rest assured that any lessons learned following this review will have been shared appropriately with the relevant authorities via established channels.

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 is:

Section 40(1)(2) - Personal Information

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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

Force Disclosure Decision Maker

Wiltshire Police offer a re-examination of your case under its review procedure.



Force Disclosure Unit

Wiltshire Police HQ, London Road, Devizes, Wiltshire SN10 2DN



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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

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:

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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/>