

**Force Disclosure Unit**

Wiltshire Police HQ

London Road

Devizes

Wiltshire

SN10 2DN

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XXXXXX – by E Mail

Date: 6th August 2026

Your ref: FOI

Our ref: FOI 2026 / 646

Reply contact name is: Nick Penny

Dear XXXXXX,

I write in connection with your request for information dated 13th July 2026 concerning Recorded Sexual Offences.

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 Learning & Development, Policy, Business Intelligence and Crime Standards Teams - I am not obliged to supply the information you have requested.

You wrote

Please find attached a request under the Freedom of Information Act 2000. I would be grateful if it could be considered in accordance with the provisions of the Act.

The request relates to the electronic recording of victims with learning disabilities, autism and mental health conditions in connection with offences recorded under the Sexual Offences Act 2003 between 1 January 2021 and 31 December 2025.

Question 1 – Recording of Victim Characteristics

Please confirm whether, for offences recorded under the Sexual Offences Act 2003 during 1 January 2021 to 31 December 2025, your force records the victim as having any of the following as searchable electronic fields, vulnerability markers, disability markers, electronic flags or other searchable identifiers: learning disability; autism; mental health condition; or another vulnerability marker indicating cognitive impairment or mental impairment.

For each category, please indicate whether it is recorded as a searchable electronic field, vulnerability marker, disability marker, electronic flag, other searchable identifier (please specify), or is not recorded in a searchable electronic format.



Question 2 – Recorded Sexual Offences

Where an existing electronic search, report or query can identify offences falling within Question 1 without the manual examination of individual case records, please provide annual figures (2021–2025) broken down, where available, by Home Office offence code and offence description. If your force already produces management information or performance reports containing these data, those reports may be supplied in satisfaction of this part of the request.

Question 3 – Final Recorded Outcomes

Where held electronically, please provide the final recorded Home Office Outcome Code (or local equivalent where Home Office Outcome Codes are not used) for the offences identified in Question 2.

Question 4 – Victim Support Measures

Where held electronically, please provide the number of cases identified in Question 2 in which an Appropriate Adult, Registered Intermediary or any other communication support measure was recorded as a searchable electronic field, marker, flag or other searchable identifier.

Question 5 – Policies, Guidance and Training

Please provide copies of any current policy, current operational guidance, training or other guidance documents relating to recording learning disabilities, autism or mental health conditions for victims of sexual offences; investigating such offences; reasonable adjustments; communication support; safeguarding; and specialist victim support.

Question 6 – Internal Reviews

Please state whether your force undertook any internal audit, quality assurance exercise, internal review or inspection (whether undertaken internally or commissioned externally) between 1 January 2021 and 31 December 2025 relating to the recording of these characteristics or the investigation of such offences. Where held electronically and not exempt, please provide copies.

Question 7 – Recording System Policies, Reviews and Plans

Please provide copies of any recorded policy, audit, review, strategy, programme documentation, project documentation, business case or implementation plan held between 1 January 2021 and 31 December 2025 relating to improving the recording or electronic searchability of learning disability, autism or mental health conditions within crime recording or case management systems, where held and not exempt.

Our response:

The information that you are requesting predominantly around Training is not stored in a way which permits easy retrieval and is – in addition – simply too voluminous.

Our Learning & Development Team have advised that from a training perspective, broad themes and topics are often covered throughout training very widely, so it's very difficult to be able to identify precisely where within training materials this is documented in order to provide material that responds directly to the questions being asked. They have likened this to trying to extract the eggs from from a cooked cake as an analogy.

On reviewing the Force Policy & Procedures Library, this contains well in excess of 300 documents. Keyword searches for "Sexual Offences" returned 13 results, "Learning Disabilities" returned 5 results and "Mental Health" returned 18 results.

In addition the College of Policing has also created what they call the NOM App which includes 78 'toolkits' which are a range of guidance documents and templates. The search function isn't great on the NOM App, but running keyword searches for the term "Learning Disabilities" returned 33 results, "Autism" returned 35 results and "Mental Health" returned 49 results.

Our Learning & Development Team have advised that it's virtually impossible to predict how much time it would take to review all of this relevant material in order to find everything that's relevant in order to answer this request. For example, victims of sexual offences covers a wide range of offences which includes both PIP1 and PIP2 investigations. They have, however, estimated that even if a fulltime person was dedicated to this task, it would still take them several weeks to undertake and correlate all the information you require, redacting information where necessary.

Under the circumstances I am 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.

Please also note that if one part of the request engages a Section 12 response, the whole request will ordinarily 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 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 – Recording of Victim Characteristics

Please confirm whether, for offences recorded under the Sexual Offences Act 2003 during 1 January 2021 to 31 December 2025, your force records the victim as having any of the following as searchable electronic fields, vulnerability markers, disability markers, electronic flags or other searchable identifiers: learning disability; autism; mental health condition; or another vulnerability marker indicating cognitive impairment or mental impairment.

For each category, please indicate whether it is recorded as a searchable electronic field, vulnerability marker, disability marker, electronic flag, other searchable identifier (please specify), or is not recorded in a searchable electronic format.

Whilst our crime recording systems are fairly sophisticated and contain a number of fields in which certain specifics regarding a crime are recorded, when it comes to Vulnerability Markers this is limited.

We do not have flags or markers that are used to record disability, learning disability; autism; mental health conditions or cognitive / mental impairment.

There are markers under the person flag type field for VRA (Vulnerability Risk Assessment) levels - high, medium and standard. There is also a vulnerable adult marker. It should be noted that the person flag type is NOT a mandatory field to be completed however and it is used at the discretion of the person creating the record. It needs to be noted that some crime records may have been recorded without the inclusion of a vulnerability flag even though the victim may indeed have been vulnerable. As a consequence, this caveat needs to be considered in respect of the detailed information provided later in this response.

Question 2 – Recorded Sexual Offences

Where an existing electronic search, report or query can identify offences falling within Question 1 without the manual examination of individual case records, please provide annual figures (2021–2025) broken down, where available, by Home Office offence code and offence description. If your force already produces management information or performance reports containing these data, those reports may be supplied in satisfaction of this part of the request.

Where Vulnerability Flags have been completed for victims of crimes requested in Q1, the total number of crimes by year and vulnerability level are shown in the attached excel spreadsheet on Tab Q2-1

Details of these crimes then broken down by Home Office offence code and description are shown in the attached excel spreadsheet on Tab Q2-2

Question 3 – Final Recorded Outcomes

Where held electronically, please provide the final recorded Home Office Outcome Code (or local equivalent where Home Office Outcome Codes are not used) for the offences identified in Question 2.

The recorded outcomes of those crimes are shown in the attached excel spreadsheet on Tab Q3

Question 4 – Victim Support Measures

Where held electronically, please provide the number of cases identified in Question 2 in which an Appropriate Adult, Registered Intermediary or any other communication support measure was recorded as a searchable electronic field, marker, flag or other searchable identifier.

No Information Held.

There is no obligation on an Authority to provide an explanation or any rationale when providing a No Information Held response. However in this case – and under our Section 16 duty to be as helpful as possible to an applicant – I am happy to provide some additional context to you.

We do not formally record whether victims have an Appropriate Adult, Registered Intermediary or any other communication support measure at any stage in the

investigation process, primarily as we have no statutory requirement to do so. If held, this information may be recorded on an MG11 (statement) or somewhere within the detailed occurrence log of a crime record – however to undertake searches of all such documentation involved would inevitably take an excessive amount of time given (given the number of records involved) and invoke a Section 12 exemption in our response.

All victims under 18 years would have an appropriate adult present at any interview however.

Question 5 – Policies, Guidance and Training

Please provide copies of any current policy, current operational guidance, training or other guidance documents relating to recording learning disabilities, autism or mental health conditions for victims of sexual offences; investigating such offences; reasonable adjustments; communication support; safeguarding; and specialist victim support.

We are not aware of any policy or guidance relating to recording learning disabilities, autism or mental health conditions for victims of sexual offences.

The policies on investigating sexual offences – the RASSO (Rape and Serious Sexual Offences) Policy and the Non-Contact Sexual Offences Policy - apply to all sexual offences investigations and victims regardless of any learning disabilities, autism or mental health conditions. I have attached a copy of both of these policies.

We are also not aware of any specific policy or guidance covering reasonable adjustments; communication support; safeguarding; or specialist victim support for victims of sexual offences with learning disabilities, autism or mental health conditions. The Rape and Serious Sexual Offences Policy contains information on victim safeguarding and support which applies to all victims.

When it comes to specific training provided to members of the Force around these matters, I have been provided with the following responses from around the Force in respect of the types of Training / Topics covered :-

Equality, Diversity and Inclusion training

This training includes broader topics such as the Equality Act 2010, protected characteristics, disability awareness, inclusion, accessibility and reasonable adjustments. However, it is not operational training and does not provide guidance on the investigation of sexual offences specifically, victim care processes, safeguarding procedures or the recording of vulnerability information. Our Learning & Development Team do not hold and are not aware of any training or guidance documents that fall within the scope of your request. Any operational information held in relation to these matters is likely to sit within the relevant operational departments and specialist investigative areas.

CCC (crime & Communication Centre) initial learning / training

When staff are given niche training for CCC/EO roles, they use either local or NICL qualifiers to show disability or mental health. These are not specific to the individual and are assigned to the whole niche crime record.

For CCC staff, THRIVE training will flag any learning disabilities/autism/mental health if this information is given on the call. This is all recorded under THRIVE on the STORM log and/or niche crime record. Training is given around specialist victim care, reasonable adjustments, safeguarding, or communication support to enable call handlers to identify other areas of the business such as MH triage, Horizon, MASH, VAWG who need to be aware and can offer the appropriate support. These teams give individual inputs to CCC staff during their initial training to give a broader understanding of their area of specialism.

For CCC staff, no specific investigative training is given around these areas.

Student Officers

We do not train Student Officers specifically in respect of the recording of learning disabilities, autism or mental health conditions for victims of sexual offences. They ARE taught how to recognise and support victims who have learning needs or other vulnerabilities. This also covers what entitlements they will have in law.

Whilst the documentation required for any safeguarding and multi-agency referral work is covered, the physical recording of those details on our Niche crime recording system is not.

General Officer Training

There are a number of themes in your request, asking for copies of any current policy, current operational guidance, training or other guidance documents relating to:

1. Recording learning disabilities, autism or mental health conditions for victims of sexual offences.
2. Investigating such offences.
3. Reasonable adjustments.
4. Communication support.
5. Safeguarding.
6. Specialist victim support

Dealing with these in turn, what I am able to confirm is the following :-

Recording

The Youth Justice & Criminal Evidence Act (YJCEA) 1999 and the relevant Achieving Best Evidence (2022) Guidance are relevant legislation/guidance.

A victim of a sexual offences is recognised as intimidated under s17 of the YJCEA 1999.

Learning disabilities, autism or mental health conditions may also identify them as vulnerable under s16 of the YJCEA 1999.

This should be identified and recorded as part of an Initial Victim Needs Assessment which forms part of the Statutory Guidance - Victims' Code of Practice (Updated January 2025).

Training about this is delivered within PIP1 training to initial recruits.

Further training is also delivered within PIP2, especially within the range of national training products from the College of Policing.

SSAIDP – Specialist Sexual Assault Investigators Development Programme (which includes completion of a portfolio).

PIP1 officers are required to record their Initial Victim Needs Assessment on the Occurrence Enquiry Log, within the Investigation Plan template.

The College of Policing has also created the aforementioned NOM App which includes 78 'toolkits'.

Investigating such offences.

Similarly, as above, there are numerous documents and training courses/materials that are relevant.

The SSAIDP course notably includes a case study with an autistic victim. The wider themes are also covered more broadly.

Reasonable adjustments.

Training delivered addresses the topics of s16 Vulnerable, s17 Intimidated, Special Measures (which can be considered reasonable adjustments to support achieving best evidence in court), VIPS & VCOP enhanced rights.

Communication support.

Training delivered addresses Special Measures including s29 Registered Intermediary & s30 Communication Aids as well as interview supporters, albeit their role is limited to emotional and moral support, so only assist communication by giving the victim the confidence to be able to speak.

Safeguarding.

This is trained throughout all training, beginning with PIP1 initial recruit training. This is a very broad topic, most thoroughly dealt with during the delivering of Public Protection Department training (DA/CP/HBA/FGM/FM etc.) including Sexual Offences.

Specialist victim support.

Similarly, this features throughout lots of training and includes presentations from ISVA & IDVA SME's.

Question 6 – Internal Reviews

Please state whether your force undertook any internal audit, quality assurance exercise, internal review or inspection (whether undertaken internally or commissioned externally) between 1 January 2021 and 31 December 2025 relating to the recording of these characteristics or the investigation of such offences. Where held electronically and not exempt, please provide copies.

Wiltshire Police have not carried out any auditing of Sexual offences specifically where there has been these characteristics identified. If these were in any way identified, it would not have formed part of the audit in any case as the Team involved in any audit would not have even known they were in existence.

Our Crime Standards Team undertake ongoing assessments of investigations / crime recording in accordance with agreed Home Office and College of Policing guidance.

Question 7 – Recording System Policies, Reviews and Plans

Please provide copies of any recorded policy, audit, review, strategy, programme documentation, project documentation, business case or implementation plan held between 1 January 2021 and 31 December 2025 relating to improving the recording or electronic searchability of learning disability, autism or mental health conditions within crime recording or case management systems, where held and not exempt.

Our Crime Standards Team are not aware of any policy/strategy in respect of improving the recording or searching of those characteristics/conditions mentioned, certainly not with Home Office Counting Rules which is what we use to record crime. We don't have our own force crime recording policy.

Ordinarily under our section 16 duty to provide advice and assistance, we would advise you how to refine your request in respect of the Training aspects of 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.

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