



Dear ,

Gloucestershire Constabulary Freedom of Information request 2023.0616

On 09/06/2023 you sent an email constituting a request under the Freedom of Information Act asking the following:

I'm looking for more information in regards to money mule herders and whether they are targeting teenagers.

A money mule is someone who lets someone else use their bank account to transfer money, often keeping a little for themselves in the process.

I would like to know:

SECTION 1: Number of people cautioned on suspicion of being a money mule:

1. How many people aged between 11-15 have been cautioned on suspicion of being a money mule broken down for the following years
 - a. 1 January 2019 and 31 December 2019
 - b. 1 January 2020 and 31 December 2020
 - c. 1 January 2021 and 31 December 2021
 - d. 1 January 2022 and 31 December 2022
2. How many people who are aged 15-16 have been cautioned on suspicion of being a money mule broken down for the following years:
 - a. 1 January 2019 and 31 December 2019
 - b. 1 January 2020 and 31 December 2020
 - c. 1 January 2021 and 31 December 2021
 - d. 1 January 2022 and 31 December 2022

SECTION 2: Questioned under caution on suspicion of being a money mule

3. How many people aged between 11-15 have been questioned under caution on suspicion of being a money mule broken down for the following years
 - a. 1 January 2019 and 31 December 2019
 - b. 1 January 2020 and 31 December 2020
 - c. 1 January 2021 and 31 December 2021
 - d. 1 January 2022 and 31 December 2022
4. How many people who are aged 15-16 have been cautioned on suspicion of being a money mule broken down for the following years:
 - a. 1 January 2019 and 31 December 2019

- b. 1 January 2020 and 31 December 2020
- c. 1 January 2021 and 31 December 2021
- d. 1 January 2022 and 31 December 2022

SECTION 2: Arrested on suspicion of being a money mule

5. How many people aged between 11-15 have been arrested on suspicion of being a money mule broken down for the following years
- a. 1 January 2019 and 31 December 2019
 - b. 1 January 2020 and 31 December 2020
 - c. 1 January 2021 and 31 December 2021
 - d. 1 January 2022 and 31 December 2022
6. How many people who are aged 15-16 have been arrested on suspicion of being a money mule broken down for the following years:
- a. 1 January 2019 and 31 December 2019
 - b. 1 January 2020 and 31 December 2020
 - c. 1 January 2021 and 31 December 2021
 - d. 1 January 2022 and 31 December 2022

SECTION 3: Police in schools

7. How many secondary schools has the police force worked with to hold educational sessions on money mules (such as assemblies and lessons) with students broken down for the following years:
- a. 1 January 2019 and 31 December 2019
 - b. 1 January 2020 and 31 December 2020
 - c. 1 January 2021 and 31 December 2021
 - d. 1 January 2022 and 31 December 2022
8. How many secondary schools has the police force worked with in providing pastoral support for students at risk of and engaging in being a money mule broken down for the following years:
- a. 1 January 2019 and 31 December 2019
 - b. 1 January 2020 and 31 December 2020
 - c. 1 January 2021 and 31 December 2021
 - d. 1 January 2022 and 31 December 2022

Under the Freedom of Information Act 2000 s1, I can confirm that Gloucestershire Constabulary may hold some relevant information.

Unfortunately, it's not possible to electronically search for the information you have requested.

There is no specific offence related to being a 'money mule' and therefore there is no way of electronically searching for the information requested. In order to ascertain if any potentially relevant crimes or corresponding arrests were recorded relating to this type of offending, a manual review of thousands of records would be required. It has been estimated that such a manual review would take far longer than the 18 hours prescribed by Section 12 of the Freedom of Information Act.

With regard to the Schools information, the Constabulary has Schoolbeat Officers but the specific lessons given to specific schools is not recorded in a way that can be

electronically searched to retrieve the information you have requested. Given that each of the 6 Local Policing Area has an average of 60 schools, to manually review information held as to what lessons were provided would again take far longer than the 18 hours allowed under Section 12 of the Freedom of Information Act.

Section 17(5) of the Freedom of Information Act 2000 requires Gloucestershire Constabulary, when refusing to provide information (because the information is exempt) to provide you the applicant with a notice which: (a) states the fact, (b) specifies the exemption in question and (c) states (if not otherwise apparent) why the exemption applies.

In relation to your request Section 12 applies.

Section 12(1) – Fee Regulations states:

Section 1(1) of the Act 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. (As detailed in the Data Protection and Freedom of Information Fees Regulations of 2004)

The appropriate limit at the moment is £450 calculated at an hourly rate of £25 per hour for all staff time incurred in:

- i. Determining whether information is held
- ii. Locating it
- iii. Retrieving it
- iv. Extracting the information to be disclosed from the other information.

In accordance with the Act, this letter represents a Refusal Notice for your request.

Unfortunately, I'm unable to assist in suggesting ways of refining your request to come within the confines of Section 12 of the Act. Even reducing the timescale would not reduce the number of records enough that a manual review could be conducted within the timescale but still provide meaningful information.

By way of assistance and although excess cost removes the Force's obligations under the Freedom of Information Act, I can confirm the following information relevant to your request which has already been retrieved. We trust this is helpful but it does not affect our legal right to rely on the fees regulations for the remainder of your request.

The Schoolbeat team has confirmed that the lessons they offer for Year 8 students relating to Exploitation and the lessons they offer for Year 9 students relating to County Lines would have reference to the subject of Money Mules.

If you are not satisfied with this response or any actions taken in dealing with your request, you have the right to ask that we review your case under our internal procedure. Please note that a request for an internal review must be made within 20 working days of the response to your original request.

If you decide to request that such a review is undertaken and following this process you are still unsatisfied, you then have the right to direct your complaint to the Information Commissioner for consideration.

Yours sincerely,

Disclosure Officer
Gloucestershire Constabulary