



Your reference: N/A
Our reference: FOI_24_1144
E-mail: FOI
@gloucestershire.police.uk
Direct dial: 01452 754304
Postal Address: As above
Date: 24/01/2025

Dear

Gloucestershire Constabulary Freedom of Information request FOI_24_1144

On 23/12/2024 you sent an email constituting a request under the Freedom of Information Act asking the following:

1. The number of reports from the past five years of suspected modern slavery within the waste sector. Please can you provide a breakdown of the number of reports per year.
2. The number of times the Environment Agency reported suspected modern slavery to the police force over the past five years. Please can you provide a breakdown of the number of reports per year.
2. Details of what these reports said. Please can this include the name of the site that was reported and details of the concerns raised.
3. Information on whether these reports were investigated by the police force. Please can you provide any relevant documentation relating to these investigations.
4. Details of what the outcome of the investigation was.
5. The number of confirmed incidents of modern slavery within the waste sector that your police force referred to the National Crime Agency or partners in the Joint Waste Crime Unit in the last five years.
6. The number of confirmed incidents of modern slavery within the waste sector from the past five years. Please can you provide a breakdown of the number of incidents per year.
6. Correspondence (including letters, emails, minutes of meetings and any relevant attachments) between the Environment Agency and the police force over the past two years relating to modern slavery.

Further details regarding your original request was received from you on 24/12/2024 asking the following:

Apologies but following feedback I would like to narrow down this request to the following, please can you confirm receipt and provide a reference number.

Please can I obtain the following information:

1. The number of records of contact, reported incidents and recorded crimes from the past five years (1 January 2019 - 24 December 2024) of suspected modern slavery within the waste sector. Please can you provide a breakdown of the number of reports per year.
2. Details of what the outcome of any completed investigation was - e.g were any arrests made.
3. The number of times the Environment Agency reported suspected modern slavery to the police force over the past five years (1 January 2019 - 24 December 2024). Please can you provide a breakdown of the number of reports per year.
4. Details of what these reports said. Please can this include the name of the site that was reported and details of the concerns raised.
5. The number of incidents or recorded crimes of modern slavery within the waste sector that your police force referred to the National Crime Agency and/or partners in the Joint Waste Crime Unit (JWCU) in the last five years (1 January 2019 - 24 December 2024). Please state the number referred to the NCA, and the number referred to the JWCU separately
6. Correspondence (including letters, emails, minutes of meetings and any relevant attachments) between the Environment Agency and constables, sergeants, and inspectors within the police force over the past year (1 January 2024 - 24 December 2024) relating to modern slavery within the waste sector.

A clarification email was sent to you 16/01/2025 requesting for confirmation of the term 'waste sector' and we also provided a link to the Home Office Counting Rules website for you to view and confirm which offences you wanted us to conduct searches on.

You responded on the same day confirming the following

By waste sector I mean the waste management industry. I.e the collection of industries that manage waste. This includes waste recycling, dumping, and prevention.

Please can you search for the following potential crimes:

N200 Reported Incident of Modern Slavery

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

When an Individual contacts the police and it's deemed to be a police matter, an incident will be created on the Incident Recording System. If that incident is deemed to fall within the Home Office Counting Rules for Recorded Crime, a crime will be recorded on the Crime Recording System. In order to fulfil your request a manual review would be required to determine where a report has come from i.e. made by the environmental agency. This is due to the Incident Recording System being largely a free text entry system which does not record information in as much detail as the Crime Recording System and therefore its reporting function is limited.

There are no recording tags or markers to enable electronic extraction of this data. A manual review for this information would involve the review of thousands of records and

would therefore take far longer than the 18 hours prescribed by the Freedom of Information Act.

Please see below for suggestions on how you may be able to refine your request to come within the cost constraints of Section 12 of the 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.

Section 16 – unable to assist

Unfortunately, I'm unable to assist in suggesting ways of refining your request with regards to incidents/reports 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.

We can search the crime recording system for the number of records where the offence of N200 Reported Incident of Modern Slavery may be recorded, however in order to determine whether information is held in relation to the occupation of the victim a manual review would still be required. Depending on the results of the search section 12 may still be engaged.

If the above would be of some use to you please submit a new request for this information.

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.

The Information Commissioner can be contacted via the following means:

Website - <https://ico.org.uk/>

Call their helpline - 0303 123 1113

Email - casework@ico.org.uk

Post –

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Yours sincerely,

Disclosure Officer
Gloucestershire Constabulary