



Your reference:

Our reference: FOI_25_0071

E-mail: FOI

@gloucestershire.police.uk

Direct dial: 01452 754304

Postal Address: As above

Date: 02/04/2025

Dear

Gloucestershire Constabulary Freedom of Information request 2025_0071

On 20/01/2025 you sent an email constituting a request under the Freedom of Information Act asking the following:

1. In each of the last five calendar years (2019, 2020, 2021, 2022, 2023), how much did the force spend on purchasing information from data brokers such as Experian, Equifax, Acxiom and others?

Please provide a full breakdown of spend with each provider in each calendar year. For example, in the following format:

Provider	2019	2020	2021	2022	2023
Experian					
Equifax					
Acxiom					
[insert others below]					

2. For what purposes does the force purchase information from data brokers?

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

Q1.

2019 – 2020 - £21,157.55

2020 – 2021 - £47,862.12

2021 – 2022 - £30,258.57
2022 – 2023 - £32,641.87
2023 – 2024 - £21,400.42

Section 1 of the Freedom of Information Act 2000 (FOIA) places two duties on public authorities. Unless exemptions apply, the first duty at Section 1(1)(a) is to confirm or deny whether the information specified in a request is held. The second duty at Section 1(1)(b) is to disclose information that has been confirmed as being held. Where exemptions are relied upon s17 of FOIA requires that we provide the applicant with a notice which: a) states that fact b) specifies the exemption(s) in question and c) states (if that would not otherwise be apparent) why the exemption applies.

With regards to any further information relating to specific data brokers, Gloucestershire Constabulary can neither confirm nor deny whether information relevant to this request is held, as the duty in Section 1(1)(a) of the Freedom of Information Act 2000 does not apply by virtue of the following exemptions:

Section 30(3) – Investigations and proceedings conducted by public authorities
Section 31(3) – Law Enforcement

Section 30 is a qualified, class based exemption and therefore a public interest test is required.

Section 31 is a qualified and prejudice based exemption therefore both a Public Interest Test and Harm Test are required.

Evidence of Harm

A wide range of investigative methods are deployed by police in investigations and the gathering of evidence in order to bring the perpetrators of crime to justice, and where disclosure of information including, in some cases, confirming or denying information is held would risk prejudice to any such investigations it should not be given.

It must be considered that a disclosure under FOI is not a private transaction but rather a broadcast to the world. To confirm or deny that any other information is held in respect of ongoing covert investigations would risk revealing to criminals including organised criminal gangs, police intelligence and the focus of investigative activity particularly in financial and economic crime. Irrespective of whether any other information is or isn't held, ongoing covert investigations would be compromised if an offender were to be made aware of what may or may not be held about any specific lines of enquiry within covert investigations, namely the use of data brokers for intelligence gathering. To do so would enable them to take steps to alter their behaviour and/or destroy evidence, undermining the police's key functions of detecting crime and apprehending offenders.

Additionally, in order to ensure the police deliver effective law enforcement they liaise with various other law enforcement partners. By confirming or denying that any other information is held in respect of covert ongoing investigations, not only would operational law enforcement and investigations be compromised as evidenced above, but any partnership working that may be in place would also be compromised.

Public Interest Considerations

Section 30 - Factors Favouring Confirmation or Denial

By confirming or denying that any other information relevant to your question exists would satisfy the public that the police take their responsibility to investigate crime thoroughly and that public money is well spent in securing evidence in criminal activity.

Section 30 - Factors Against Confirmation or Denial

By confirming or denying that any other information relevant to this question exists would hinder the protection of any operations the force has under the guise of covert activity that the force would not want to be known by criminals. This information would be sensitive and the force would not want them to adapt their offending behaviour in order to avoid detection.

Section 31 - Factors Favouring Confirmation or Denial

Disclosure would provide transparency in how police investigate crime and provide reassurance that tactics are being utilised appropriately to prevent and detect criminal activity. It would also serve to demonstrate that the police are open and accountable.

Section 31 - Factors Against Confirmation or Denial

The police have a duty of care to the community at large. If an FOI disclosure revealed information to the world (by citing an exemption or stating no information held) that would undermine an investigation, this could be used to offenders' advantage and would compromise potential victims and the public generally. It may also encourage offenders to alter their behaviours resulting in further, undetected crime.

Balance Test

The factors above highlight the merits of confirming, or denying, whether any other information pertinent to this request exists. The Police Service is charged with enforcing the law, preventing and detecting crime and protecting the communities we serve. As part of that policing purpose, various types of investigations may or may not be ongoing. The Police Service will never divulge whether any other information pertinent to a request does or does not exist, if to do so would compromise an ongoing investigation, or undermine the policing purpose in the effective delivery of operational law enforcement. Whilst there is a public interest in the transparency of policing operations and investigations it will be overridden in exceptional circumstances. Therefore, at this moment in time the balance test for neither confirming nor denying that any other information is held is appropriate.

No inference can be taken from this refusal that further information does or does not exist.

Q2. There is no collated information in regards to this question

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