



Your reference: N/A
Our reference: FOI_25_0111
E-mail: FOI
@gloucestershire.police.uk
Direct dial: 01452 754304
Postal Address: As above
Date: 25.02.2025

Dear

Gloucestershire Constabulary Freedom of Information request FOI_25_0111

On 29/01/2025 you sent an email constituting a request under the Freedom of Information Act asking the following:

1. The forces use of force policy and any associated guidance. This can be redacted but specifically requiring anything that governs the practice of "compliant handcuffing" as well as anything the force has issued to officers and/or supervisors/investigators/psd that supports or advises against its practice.
2. Any elements of your officer safety training material/handouts that covers "compliant handcuffing". For clarity I do not require the operational detail of how officers are trained to handcuff either compliant or non-compliant individuals but what the forces teaches them in respect of it as a power and how and when it should be used in an operational policing context.
3. The forces official stance on the "widespread" or "routine" use of "compliant handcuffing"
4. How many times (and the outcomes if any) in 2024, 2023 and 2022 "compliant handcuffing" has been deemed either unjustified (and as such was excessive use of force) or inappropriate for the circumstances at the time (these terms are not set in stone and should be taken to mean the number of times this practice was viewed in a negative light" either by: The Professional Standards Team (or similar), the local policing body (e.g. The Offices of the Police and Crime Commissioner), HMICFRS or any and all independent mechanisms that exist for the scrutinising of the police use of force. If there is an issue with the wording or cost limit of this request please contact me before refusing it.
5. The forces complaints policy. Complaints external website

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

Regarding Q4, unfortunately to be able to provide instances where "compliant handcuffing" has been deemed either unjustified or inappropriate for the circumstances at the time would require a review of all cases for the selected years which would exceed the 18 hours as prescribed by 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.

Providing Information Outside of the Act

By way of assistance and although excess cost removes the Force's obligations under the Freedom of Information Act, we have supplied the 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.

1. We do not have a force policy on use of force, we refer to the guidance from the College of Policing.
2. During Public & Personal Safety Training, the Officers are asked to justify their reason for handcuffing during scenarios and reminded of the two reasons are "Fear of violence or Escape. Officers are reminded to be aware of Article 3 of the Human Rights Act and pointing out that Handcuffs can cause pain and inappropriate use of handcuffs or pain compliance can breach the article.
3. Routine use of handcuffs without the justification is not taught or encouraged.
4. Explanation above for the section 12.
5. Individual police forces in the UK don't have complaints policies, we follow the guidance outlined by the Independent Office for Police Conduct (IOPC). A link to the guidance is here.

[Statutory guidance | Independent Office for Police Conduct](#)

Section 16 – unable to assist

Unfortunately, I'm unable to assist in suggesting ways of refining your request to come within the confines of Section 12 of the Act.

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