



Your reference:

Our reference: FOI_25_0944

E-mail: FOI

@gloucestershire.police.uk

Direct dial: 01452 754304

Postal Address: As above

Date: 23/10/2025

Dear

Gloucestershire Constabulary Freedom of Information request FOI_25_0944

On 26/09/2025 you sent an email constituting a request under the Freedom of Information Act asking the following:

Since January 2021, how many police officers at your force, who are or have been holders of a personal firearms or shotgun certificate, have also been the subject of a misconduct investigation regarding alleged police perpetrated domestic abuse (regardless of outcome or if there was a case to answer)?

Please break down the numbers as outlined below:

- The total number of police officers who had a personal firearms or shotgun certificate at the time their PPDA misconduct investigation was initiated and
 - o Of these, the number where the eventual result of the initial investigation was that
 - ☐ a) there was a case to answer
 - ☐ b) there was no case to answer,
 - ☐ c) the officer was referred to RPRP
- The total number of police officers who remained holders of personal firearms or shotgun certificate throughout their misconduct investigation and
 - o Of these, the number where the eventual result of the initial investigation was that
 - ☐ a) there was a case to answer
 - ☐ b) there was no case to answer,
 - ☐ c) the officer was referred to RPRP
- The total number of police officers who gained a personal firearms or shotgun certificate having previously been the subject of a PPDA misconduct investigation (where this information is known)
 - o Of these, the number where the eventual result of the initial investigation was that
 - ☐ a) there was a case to answer
 - ☐ b) there was no case to answer,

- c) the officer was referred to RPRP

Gloucestershire Constabulary can neither confirm nor deny that any information is held relevant to this request 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 31(3) – Law Enforcement

Section 40(5) – Personal Information

Section 31 is prejudice based and qualified which means that there is a requirement to articulate the harm in confirming or not whether information is held as well as carrying out a public interest test.

Section 40 is a class based absolute exemption and there is no requirement to evidence the harm or consider the public interest.

Section 40(5B)(a)(i) - Personal Information – giving information to a member of the public of the confirmation or denial that would have to be given to comply with section 1(1)(a) would (apart from this Act) contravene any of the principles of the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

To confirm that any information is held or not, could confirm personal data. In some circumstances confirming or denying whether information is held could itself identify a living individual and would therefore breach the principles of the GDPR and the Data Protection Act 2018.

Personal data is defined by Article 4 of the GDPR and Part 1 of the Data Protection Act 2018, and means any information relating to an identified or identifiable natural person ('data subject'). An identified natural person is one who can be identified directly or indirectly from that data.

This use of neither confirm nor deny should not be taken as proof that such information does or does not exist.

Evidence of Harm

Confirming or denying whether any officers who may hold current or old personal firearms and shotgun certificates have been subject to misconduct proceedings relating to alleged Domestic Abuse proceedings would be likely to prejudice the prevention or detection of crime, and/or the apprehension or prosecution of offenders.

Acknowledging the existence or non-existence of such information could allow inferences to be made about individual officers, vetting standards or internal disciplinary matters relating to firearms ownership. This could undermine public confidence in police firearms management, compromise internal security processes and may assist individuals seeking to exploit perceived vulnerabilities within the policing systems.

Any disclosure, even to confirm or deny could therefore prejudice law enforcement by affecting operational integrity and the safety of both officers and the wider public.

Public Interest Test

S31 Factors in favour of confirming or denying.

Confirming or denying whether information exists relevant to this request would promote transparency and accountability in the way forces manage firearms licensing and handle allegations of misconduct. This would also lead to public confidence in police disciplinary processes.

S31 Factors against confirming or denying.

Confirming or denying any information is held could compromise law enforcement capabilities and internal procedures. This could expose sensitive information about internal vetting, disciplinary thresholds and firearms licensing practices.

Any confirmation or denial could lead to the identification of specific officers putting them at or their families at risk. Officer safety is extremely important and revealing even the existence of such information could compromise that.

Balance Test.

While the public has legitimate interest in understanding how police forces handle firearms licensing and allegations of misconduct among officers, this must be weighed against the potential harm that could result from confirmation or denial.

On balance, the public interest favours maintaining the NCND response. Protecting Law Enforcement processes, safeguarding officers and preventing unfair disclosure of personal data outweighs the benefits of confirming or denying that the requested information exists.

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