FOI Disclosures April 2025

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This month we have responded to questions relating to the following topics:

If you require a full copy of any of the embedded attachments, please contact Requestinfo@policeconduct.gov.uk quoting the reference number from the relevant response.

Ref 5025363 Back to top	**Religious Beliefs of IOPC staff**
Request	*"1. How many members of staff identify with the following religions? Please provide figures for each religion.* *Buddhism* *Christianity* *Hinduism* *Islam* *Judaism* *Sikhism* *2. How many members of staff identify as atheist?"*
Response	Staff provide this data on a voluntary basis so it should not be understood as confirming the declarations made by all our employees. Atheism is not included in the list of religions our employees are asked to declare.

Religion	Count
Christian	352
Hindu	17
Jewish	2
Muslim	45
No Religion	398
Not stated	107
Other Religion	37
Prefer not to answer	31
Sikh	10
Grand Total	**999**

Ref 5025368 Back to top	**Referrals relating to stalking**
Request	*"Please provide data on forces who referred themselves due to negligence and misconduct in stalking investigation, which led to death.* *Deaths in custody excessive force results from IOPC investigation.* *Any sexual or foul play by chief staff results* *All recommendations from you office for misconduct proceedings results* *Data from 2019"*
Response	We have understood the first part of your request as relating to formal referrals from police forces to the IOPC (as required by legislation) relating to negligence and misconduct in stalking investigations which led to death. We do not routinely extract data from referrals from which we can identify cases in this specific category. Consequently, researching and compiling the data required by this part of your request would be a manual exercise in which we would have to visit every referral we have received in the period from 1 January 2019 to the present. As the IOPC receives an average of about 5,000 referrals a year from police (7,000 were received in 23/24), the task of complying with this part of your request would exceed the cost limit under section 12 of the FOIA. Multiple requests within a single item of correspondence are considered to be separate requests for the purpose of section 12. If they relate to the same overarching theme, public authorities can aggregate two or more separate requests, in accordance with the conditions laid out in the FOIA Fees Regulations. We find that the multiple requests in your email are connected by a single overarching theme, namely different types of misconduct referred to and/or investigated by the IOPC and the outcomes of these investigations. We conclude, therefore, that section 12 of the FOIA applies to all of the request with the result that we are not obliged to comply with them.

	In line with our duty to advise and assist FOIA applicants, we have gone on to consider how far our published information may assist you with the matters in which you are interested. Police forces have a statutory duty to refer all incidents involving a death or serious injury to the IOPC. Under our 'Annual deaths during or following police contact' research series, we publish statistics from these referrals on the nature and circumstances of deaths during or following police contact. We have published these statistics annually for over fifteen years. You will see from our reports that the five categories of death we apply in our research include 'Other deaths following police contact - IOPC independent investigations only'. These include deaths that occurred after the police were contacted about concerns for a person's welfare and there is concern about the nature of the police response. Within this category, the deaths are further grouped based on the reason for contact with the police prior to their death and the most relevant group for the first part of your request is 'Concern for welfare –threatening behaviour/harassment'. Pages 26-32 of our Annual deaths report 2023/24 set out the results of our most recent research under the category of 'other deaths following police contact' and similar data can be found in previous report. While this data relates only to IOPC investigations and not to referrals more generally, it may be of interest to you because it includes data about deaths referred to and then investigated by the IOPC where there were concerns about the police response to allegations of harassment. In regard to the second part of your request, under the category of 'deaths during or following police custody' we publish data in our annual deaths reports about the circumstances of the death, including data on whether force was used against the individual by officers or members of the public before their deaths. We do not collect data on allegations of "sexual or foul play by chief staff". We have understood 'chief staff' as referring to chief police officers. The policing bodies responsible for recording complaints against chief officers are Police and Crime Commissioners and the Mayor's Office for Policing and Crime and you may wish to consider contacting them directly for this information. In regard to recommendations by the IOPC for misconduct proceedings and their results, we publish this information in our Investigation outcomes reports, the earliest of which relates to investigation outcomes in the year to 31 March 2019. Our most recent report relates to investigations and proceedings completed in 2022/23. We have yet to complete the task of extracting and validating the data for our 2023/24 report.

Ref 5025377 Back to top	**Complaints meeting mandatory referral criteria**
Request	*"Can you please provide the statistics in relation to how many reports have been made directly by the public over complaints that fall under a mandatory referral criteria. And also as to why the IOPC are allowing police forces to decide that they do not have to be investigated for complaints under this criteria via allowing police forces to refuse to submit such complaints to the IOPC."*
Response	We have understood this request as asking for data about police complaints reported to the IOPC by members of the public that meet the criteria for mandatory referral but were not referred by the police to the IOPC. The IOPC does not hold this information. This is because we do not collect data about public complaints from which it would be possible to assess in every case whether the matter should have been referred. Many of the complaints made directly to the IOPC are made using the form on our website which is designed to submit the complaint directly to the Professional Standards Department (PSD) of the force concerned. As this is an automated process, we do not make any assessment of these complaints or retain the completed forms. We do not hold information about the IOPC "allowing police forces" to decide that they do not have to make referrals under the mandatory criteria and neither do we hold information that addresses the specific set of circumstances you describe. The police complaints legislation does not enable members of the public to make formal referrals to the IOPC. An allegation of corruption must be referred only when it meets the definition of 'serious corruption' as confirmed by paragraphs 9.15 to 9.23 of our Statutory Guidance. While a complainant may expressly allege that their complaint amounts to 'serious corruption', a referral is necessary only when the complaint discloses a matter that falls within the technical definition. By way of advice and assistance, however, we set out below the ways in which statutory and other procedures are designed to ensure that forces make the referrals to the IOPC that they are obliged to make by law. If the IOPC becomes aware of a matter which has not been referred, which meets the mandatory referral criteria, the first step would be dialogue with a view to explaining the reasons why a matter should be referred. If dialogue has been unsuccessful, the IOPC has powers to require a force to make a referral. Under paragraphs 4(1)(c) and 13(1)(c) of Schedule 3 to the PRA, the IOPC can require that a complaint or conduct matter be referred to it and, on being notified of this requirement, the police force will be under a duty to make the referral to the IOPC. This power to 'call in' a referral applies regardless of whether the matter falls within the criteria for mandatory referral. In addition, paragraphs 4A and 13A of Schedule 3 to the PRA (as amended by the Policing and Crime Act 2017), allows the IOPC to consider a matter for the purposes of making a mode of investigation decision without receiving a referral

	from a force. This means the IOPC may treat any complaint, conduct matter or death and serious injury matter which comes to our attention (but has not been referred) as having been referred. The IOPC can consider these powers only on becoming of aware of a matter in which their use may be appropriate. The Police Reform Act 2002 does not provide any mechanism for a complainant to formally challenge a decision not to refer to the IOPC, or to request the IOPC to use the call in power. However, it is open to a complainant to informally request the police force to review the decision not to refer, or to bring the matter to the IOPC's attention and ask us to consider exercising our power to call it in. If the force does not refer the matter, and the complainant believes there are good grounds to argue that the mandatory referral criteria were in fact met, they could challenge that decision by way of judicial review. Please note that the FOIA does not impose any obligation on a public authority to answer questions generally, express an opinion or enter into a discussion or debate unless a question can be answered from existing records. The general right of access is not an appropriate mechanism to enquire about a personal matter.
Ref 5025385 Back to top	**Dudley Borough officer suspensions**
Request	*"Could I request information for how many police constables are currently suspended or have been charged from the Dudley borough over the last year* *Names and rank of constables if possible* *Or total numbers for crimes committed by those constables*
Response	The IOPC does not hold this information because we do not collect national statistics from police forces about police misconduct. The IOPC investigates the most serious complaints and conduct matters involving the police, and we set the standards by which the police should handle complaints. The vast majority of the approximately 120,000 allegations recorded under the police complaints system each year are dealt with by the police without IOPC involvement. Data confirming the number of officers from Dudley Borough who are currently suspended may be available from West Midlands Police. Details of how to submit a request to them is available on this page of their website: Request information about the police (Freedom of Information request) | West Midlands Police Information about police misconduct and criminal cases finalised by the 43 territorial police forces in England and Wales in the years from 1 April 2020 to 31 March 2024 is published by the Home Office here: Police Misconduct Statistics. Information about criminal proceedings against police officers and staff is accessible at table CR1. Different data on police misconduct covering the years 2016-2020 is available in this data table in the Police Workforce data series.

	The published Home Office police misconduct data is not separated by police force but may be held and available on request from the Home Office. You should contact PolicingStatistics@homeoffice.gov.uk for further information about their data. The IOPC publishes data about the outcomes of its own investigations, which account for only a minority of the proceedings and investigations into police officers and staff each year. These data are not separated by police force but include data about criminal investigations, referrals to the CPS and criminal proceedings. Our outcomes reports for the years 2018/19 to 2022/23 are available on this page of our website: Investigation outcomes reports | Independent Office for Police Conduct (IOPC) While we publish annual complaints statistics based on data collected from police forces these do not include data relating to criminal investigations, proceedings or outcomes. Our statistical reports include data about the types of complaints recorded each year but does not distinguish criminal from non-criminal allegations.
Ref 5025388 Back to top	**Microsoft International Data Processing**
Request	*Please supply me with any information, documentation, contract clause change or emails, etc. that you have received in the past two years which identify any countries where Microsoft can or actually do process any data you have uploaded to the following services:* *1 - Any service operated by or on the Microsoft Azure cloud platform by any of your processors or contracted service providers (including a direct contract with Microsoft)* *2 - Any Microsoft M365 service* *For the purposes of this request you should consider any offshored administration or direct system support as being 'processing', whether this relates to personal data or not - this is not a GDPR specific request."*
Response	Having consulted with the relevant departments within the IOPC we have decided that we are unable to release this sort of information because we consider that responding to these questions could be used against us to determine potential attack vectors by a threat actor, specifically as it describes the potential attack surface of our estate. This is sensitive information that we expect threat actors would use to improve their chances of disrupting our services which is not in the public interest. As such we are refusing to respond by virtue of an exemption at section 31(1)(a) of the FOIA. We have decided that the public interest in maintaining the exemption outweighs the public interest in disclosure.

	We have decided that responding to your questions would release details of the scale, configuration and complexity of our ICT estate into the public domain. This information could then be used against us to determine potential attack vectors by a threat actor. This information may also be combined with other data relating to potential vulnerabilities in the IOPC's systems and elsewhere, whether or not this data has been obtained by legitimate means, so as to assist in the co-ordination and targeting of attacks aimed at identifying likely points of access to UK Government IT systems. The more prior knowledge a threat activator has about the architecture of a particular system, the easier it is to plan and refine potential attacks. Consequently this would leave the system more vulnerable to attacks and could reduce the effectiveness of other counter-measures. We conclude, therefore, that the release of this information would be likely to prejudice the prevention of crime in the form of malicious cyber-attacks on IOPC and UK government IT systems.
Ref 5025398 Back to top	**IOPC External Facing Telephone System**
Request	*"Please provide a copy of the current operating documentation for your external facing telephone system used for caller management, including for example, caller reception, queuing, triage and hold.* *Please also provide the Request For Quote (RFQ) document setting out the system design and operating specifications. Please also provide the design and operating specifications for the final system implemented (in the event that this differs from the RFQ document)."*
Response	We are refusing to provide the information you have requested because it engages the exemption under section 31(1)(a) and the public interest in maintaining this exemption outweighs the public interest in disclosure. Section 31(1)(a) exempts information where disclosure would or would be likely to prejudice the prevention and detection of crime and the apprehension of offenders. We have decided that compliance with your request would confirm details of the configuration and complexity of elements of our ICT estate. This is sensitive information that we can reasonably expect to be used in reconnaissance by cyber threat actors, specifically as it describes the potential attack surface of our estate, when it is known that phishing is an increasing threat vector. We would expect threat actors to use this information to determine potential attack vectors and improve their chances of disrupting our services. This information may also be combined with other data relating to potential vulnerabilities in the IOPC's systems and elsewhere, whether or not this data has been obtained by legitimate means, to assist in the co-ordination and targeting of attacks aimed at identifying likely points of access to UK Government IT systems. The more prior knowledge a threat actor has about the architecture of a particular system, the easier it is to plan and refine potential attacks. When combined, this information could be used as reconnaissance to craft a cyber-attack with improved odds of success by a threat actor The more prior knowledge a threat actor has about the architecture of a particular system, the easier it is to plan

	and refine potential attacks. This would leave the system more vulnerable to attacks and could reduce the effectiveness of other counter-measures. We conclude, therefore, that the release of this information would be likely to prejudice the prevention of crime in the form of malicious cyber-attacks on IOPC and UK government IT systems. We recognise that there is a public interest in being informed about the IOPC's ICT infrastructure. Disclosure of this information would assist the public in ensuring that the IOPC is held to account for its expenditure of public funds relating to ICT hardware and software. However for the reasons given above we have decided that disclosure would undermine the public interest that section 31(1)(a) seeks to protect, in this case the prevention of crime. Given the heightened threat of cyber-attack in the present climate, disclosure of information relating to the scale and complexity of our ICT estate and infrastructure presents an unacceptable level of risk and would not be in the public interest.
Ref 5025409 Back to top	**IOPC Staff and External Societies**
Request	*I am requesting information concerning the internal governance, transparency, and oversight procedures of the Independent Office for Police Conduct (IOPC) in relation to fraternal organisations, specifically including Freemasonry.* *Please provide:* *1.Does the IOPC require staff, investigators, or senior officials to declare membership in Freemasonry or other fraternal organisations as part of its code of conduct, impartiality safeguards, or conflicts of interest policies?* *2.Please provide any relevant policies, procedures, or governance documents that address:* *o Staff affiliations to external societies* *o Risk mitigation around perceived bias or influence* *o Declaration, recording, and review processes* *3.Between January 2018 and March 2025, how many IOPC employees have formally declared membership in such organisations?* *4. Has the IOPC been involved in any investigations, internal reviews, or received complaints in which fraternal membership (e.g. Freemasonry) was cited as a factor contributing to potential bias, cover-up, or misconduct by police forces? Please provide anonymised data or summaries where applicable.* *5.Does the IOPC maintain any internal audit records or oversight mechanisms to monitor potential influence from such affiliations in investigations?* *This request is made in the public interest and seeks anonymised and procedural information only. No personal data is requested.*
Response	1. and 2. Our Conflicts of Interest Policy requires that the DG, DDG and Directors declare membership of "any society, or secret society, where there could be a conflict or perception of a conflict of interests". Should the DDG, DDG or Directors have declared a relevant interest related

to a fraternal society, this would be included in the Board and Directors register of interest. The most recent declarations by the Board and Directors are published on the IOPC website here: Board and Director Register of Interests - May 2024 | Independent Office for Police Conduct (IOPC)

Earlier versions of the register are available on the UK Government Web Archive, for example:

April 23: [ARCHIVED CONTENT]
August 2019: [ARCHIVED CONTENT]
August 2020: [ARCHIVED CONTENT]
April 2021: [ARCHIVED CONTENT]

As this information is accessible to you from online searches, we are under no obligation to disclose it to you separately under your request. This is because information reasonably accessible to the applicant is exempt under section 21.

3. Our Conflicts of Interest Policy contains no express requirement for other staff members to declare an interest in a society or secret society.

Should there be any declaration relevant to your request recorded under the requirement for other staff to declare 'any other private interest you consider relevant to the delivery of your duties', it would be held within the individual's employment record and, as this information has not been extracted and collated, your request could be fulfilled only by searching the file of every member of staff employed by the IOPC since 2018.

Such a search would clearly exceed the cost limit under section 12 of the FOIA when the IOPC has maintained a staff of approximately 1,000 since 2018 and we would have to search the files of many more than 1,000 current and former staff members.

We believe, however, that it is unlikely we would find any relevant records if we were to commit the resources to completing such a search.

4. While it seems likely that the IOPC or its predecessor body the IPCC has carried out an investigation in which fraternal membership was considered relevant, we have not extracted or collated information from our investigation or other files that we could use to answer this part of your request.

We could therefore comply with this part of your request only by carrying out searches of tens of thousands of cases, with the result that the cost limit would be exceeded by a very significant margin and the exception to compliance under section 12 would be engaged.

In addition, while we may be able to find cases in which bias connected with fraternal membership was alleged, this would not necessarily be useful information because many such allegations are made on the sole ground that the complainant believes that this must be the explanation for the bias that they perceive.

The IOPC publishes national complaints statistics and quarterly bulletins on its website based on complaints data recorded and provided by police forces in line with our Data Capture Guidance. This specifies the allegation categories and national complaint factors that should be applied by police forces when recording and reporting on complaints. However, complaints relating to bias due to alleged membership of a fraternal society cannot be identified from these categories or factors.

	5. We do not hold information under this part of your request. Membership of fraternal organisations is not one of our key areas of work, as confirmed on this page of our website.