



17/07/2025

REF: RM/CON-38725 FOI796

Sent via email: [REDACTED]

Dear [REDACTED]

RE: FREEDOM OF INFORMATION REQUEST – CON-FOI796

Avon and Somerset Police and Crime Commissioner's (PCC's) office have now completed the search for the information which you requested on 22nd May 2025.

Your request:

Please accept this request under the Freedom of Information Act. I'm seeking:

Minutes for all meetings of the Avon & Somerset Violence Reduction Strategic Governance Group held on and since 10 September 2019.

Our response:

Please find attached 15 sets of minutes as requested.

Within these documents, redactions have been made under the following exemptions:

- Section 31(1)(a)(b) – Law Enforcement
- Section 40(2) – Personal Information

Section 31 – Law Enforcement Exemption

Under Section 31, information that is not already exempt under Section 30 becomes exempt if disclosing it would, or would likely, cause harm to:

- (a) the prevention and detection of crime
- (b) the apprehension and prosecution of offenders

This is a qualified, prejudice-based exemption and therefore there is a requirement to evidence the harm and consider the public interest in disclosure.

Harm and Public Interest Test – Section 31

Harm considerations

Disclosing the redacted information would reveal Avon and Somerset Police intelligence, resources, and tactics. While the Police Service remains committed to accountability and proportionality regarding operational methods, revealing specific details—such as tactics, intelligence sources,

resource allocation, timings, equipment, or risk factors—would compromise these methods or severely weaken their effectiveness.

If information is disclosed across multiple requests, requesters could piece together policing strategies, enabling targeted individuals or groups to evade detection and undermine crime prevention and detection efforts.

Additionally, identifying policing priorities could advantage criminal organisations, threatening public safety and diminishing law enforcement effectiveness.

Public interest considerations

Factors favouring disclosure

Transparency allows the public to understand how funds are allocated and provides reassurance about policing effectiveness. Increased awareness supports informed public debate and can bolster confidence in the police service.

Factors favouring non-disclosure

The Police Service must ensure effective law enforcement, including crime prevention, detection, apprehension, prosecution, and justice administration. Disclosure could compromise tactics, leading to increased crime and heightened risk to individuals.

Balance test

While transparency in policing tactics is important, the strong public interest in safeguarding sensitive law enforcement information outweighs the benefits of disclosure. After careful consideration, the balance of public interest favours maintaining the exemption under Section 31.

Section 40(2) – Personal Information Exemption

Names and other identifying details have been withheld under Section 40(2) – Personal Information. This is an absolute, class-based exemption, meaning there is no requirement to consider the public interest in this context.

Personal data refers to information relating to living individuals who can be identified either directly or indirectly. Disclosing this information would risk identifying individuals, contravening the first data protection principle (lawfulness, fairness, and transparency) under the Data Protection Act 2018.

This serves as a partial refusal notice under section 17(1) of the FOI Act.

If you are unhappy about how your request has been handled and wish to make a complaint or request a review of the decision then you should write to:

The Chief Of Staff
Avon and Somerset Police and Crime Commissioner's Office
Valley Road
Portishead
Bristol
BS20 8JJ



**AVON &
SOMERSET**
POLICE & CRIME
COMMISSIONER

Please note, Avon and Somerset Police and Crime Commissioner's office provides you with the right to request a re-examination of your case under its review procedure. The appeals document is attached for your reference.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the complaints procedure provided by Avon and Somerset Police and Crime Commissioner's office. The Information Commissioner can be contacted at: <http://ico.org.uk/>.

Yours sincerely,

Freedom of Information Officer

Avon and Somerset Police and Crime Commissioners Office