

5th December 2019

Internal Review reference 003917/19

I write in connection with your request for an internal review of our response to FOI 003222/19.

I am writing to request an internal review of Norfolk Constabulary's handling of my FOI request 'Coordinate Location Systems for Emergency Call Centre Use' (003222/19). A full history of my FOI request and all correspondence is available on the Internet at this address: https://www.whatdotheyknow.com/request/coordinate_location_systems_for. I would like to complain about two aspects of your responses to my request.

First, in its initial response of 3rd October, the Constabulary claimed that the Section 31 exemption was engaged and that more time was needed to conduct a public interest test. No explanation for the engagement of the Section 31 exemption was provided at the time, and there is no mention of the exemption or the public interest test in the final response. There was also no confirmation of what information was held in the response of 3rd October.

Please provide an explanation of what has happened here, including the Constabulary's documented reasons for (initially) believing that Section 31 exemption was engaged, and the outcome of the public interest test that was presumably conducted.

Does the Constabulary accept that it failed to comply with FOIA s1(1)(a) in its response of 3rd October by not stating what information was held? Does the Constabulary now accept that Section 31 does not apply to any of the requested information, and thus it breached FOIA s1(1)(b) in failing to communicate the information within 20 working days?

Secondly, regarding the information supplied in the Constabulary's response of 17th October:

* My item 4 was not answered. If no such evaluation was undertaken, please confirm that this is the case. If it was, then please provide details. (If no evaluation was undertaken, this raises worrying questions about how the decision to promote What3Words came to be made. I'll make a separate FOI request about this if necessary.)

* In relation to item 5, can you confirm whether the "Enhanced Information Service for Emergency Calls" information you get includes AML/ELS GPS location data, rather than just relying on cell tower triangulation? I note that the report at https://eena.org/wp-content/uploads/2019/07/2019_07_17_AML_Report_Card_Update.pdf from July 2019 states on 30% of police forces use AML data from stage 1 PSAP. Please confirm whether or not Norfolk one of those to be using it.

* For item 6, you have not provided any SOP/Guidelines for call-handlers needing to determine a caller's location (I was not referring specifically to using What3Words here, but on any methods staff are encouraged/trained to use when talking to a caller who can't identify their location). I'm sure you must have some guidelines or training materials to advise/train staff how to do this. Please confirm that such documents either do not exist, or provide the relevant guidelines / training documents if they do.

* In your response to item 7, you stated that the tweet was only liked by a force account. This is incorrect: the tweet was re-tweeted by the official Norwich Police account @NorwichPoliceUK . Please confirm that you accept this. Regarding identifying the incident, I think you should be able to deduce which incident was being referred to from the information in the tweet. In particular, the date (25th August) and the fact that the Air Ambulance was called (evident from the first reply to the tweet) should narrow things down considerably. The following newspaper articles may also help you further: <https://www.dissexpress.co.uk/news/air-ambulance-report-a-number-of-bank-holiday-accidents-involving-motorcyclists-9080847/> and <https://www.dissexpress.co.uk/news/appeal-after-crash-between-a-motorcycle-and-tractor-9080858/> . I assume the recordings of the calls you receive are kept, so you should be able to review these for any difficulty in determining a location and any mention of What3Words. However, I guess it is possible that the tweeter is mistaken and it was an ambulance control centre operator rather than a police one who was unable to determine the location. Please let me know, if, having identified the incident, you believe this may be the case.

The Review

In conducting this Internal Review I have read through all of the information including the initial FOI request, the FOI responses and the argument for the Internal Review. I also met with the Chief Inspector from the Control room to discuss what information is held. When comparing the information requested and the information provided I agree with the points raised by the applicant and a revised response has to be issued. However, the scope of the Internal Review is restricted to the points raised on the individual questions by the applicant.

The following information is to be provided in a revised response whilst the information provided in the original response to the questions not listed below, remain unchanged:

Q4/ Prior to deciding to use and promote What3Words for emergency use, what evaluation of other systems (e.g. lan/lon, OS Grid references, Mapcodes, Open Location Codes, or AML/ELS) was carried out or reviewed? In particular, was any analysis done as to the effectiveness of conveying a What3Words location versus an OS grid reference over a poor phone line, and how one or other parties being non-native English speakers might affect things?

A4. No evaluation or analysis of other systems was conducted, therefore no information is held.

5/ Do your control room staff have access to AML/ELS location data (see https://en.wikipedia.org/wiki/Advanced_Mobile_Location) from smartphones, and how is this information available to them? Is this available from all 999, 911 and 112 calls made from compatible smartphones? If not, why not?

A5. Smartphone technology is not available to Control Room Operators. No information is held in relation to the reasons for this.

6/ Please provide a copy of any Guidelines or Standard Operating Procedures for control room staff who need to find the location of a caller on a mobile phone. Are staff able to interpret OS Grid references and/or Open Location Codes if the caller provides these?

A6. There are many reasons why a Control Room Operator may need to find the location of a caller on a mobile phone. For example, a missing person or an abandoned call. The original response included a Standard Operating Procedure (SOP) on '999 & Other Calls – Abandoned, Accidental, Nuisance & Silent'. The SOP provided included a narrative box that stated 'Consider Immediate subscriber check through CCR Supervisor & 'Golden Hour' checks'. The training provided to Control Room Operators is, in these circumstances, to contact the Duty Control Room Inspector.

In relation to the second part of the question. The response is Yes, staff are able to interpret OS Grid references and/or Open Location Codes if the caller provides these.

7/ In the case described at <https://twitter.com/skipptg/status/1165928846702579712> , which was recently retweeted by the Norwich Police twitter account, can you confirm that the incident

happened as described, and explain why an AML/ELS location was not available from the original call?

Q7. This was retweeted by the Norwich Police twitter account.

I have undertaken searches to locate the incident. It cannot be guaranteed but a CAD was located which best fits the description i.e. a motorcycling road traffic collision in a rural location using what3words to identify the location. The incident identified happened as described in the tweet. No information is held. The Control Room received a call from the Ambulance Service and not the motorcyclist direct.

If you are not satisfied with this response, please refer to our review procedure (copy enclosed) for further information on what to do next.

Yours sincerely,

John McGuire
Information Compliance Manager
Norfolk & Suffolk Constabularies

A full copy of the Freedom of Information Act (2000) can be viewed on the 'Office of Public Sector Information' web-site;
<http://www.opsi.gov.uk/>

The Norfolk Constabulary is not responsible for the content, or the reliability, of the website referenced. The Constabulary cannot guarantee that this link will work all of the time, and we have no control over the availability of the linked pages.

Your Right to Request a Review of Decisions Made Under the Terms of the
Freedom of Information Act (2000).

The Information Commissioner.

After lodging a request for a review with the Norfolk Constabulary, if you are still dissatisfied with the decision, you can apply to the Information Commissioner for a decision on whether the request for information has been dealt with in accordance with the requirements of the Act.

For information on how to make application to the Information Commissioner please visit their website at www.ico.org.uk or contact them at the address shown below:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 01625 545 700