



Freedom of Information Request Reference N^o: FOI 000409-19

I write in connection with your request for information received by Suffolk and Norfolk Constabularies on 29 January 2019 which you sought access to the following information:

“Facebook dictates that company pages need to be managed by real profiles.

Can you please tell me how you manage your corporate Facebook page and whether the team use duplicate/secondary accounts (rather than their real profile) to manage their Facebook page.

Can you please tell me what platform you use to manage social media content (i.e Hootsuite Planner, Trello) or any other platforms and if so, what ISO accreditation this platform holds.”

Response to your Request

The response provided below is correct as of 29 January 2019

Suffolk and Norfolk Constabularies have considered your request for information and the response is below.

1. Norfolk and Suffolk Constabularies have created a profile which serves as the admin for our 20 Facebook pages.
2. Information concerning the platform used to manage the constabularies social media content has not been provided as a result of exemptions within the Act.

Section 17 of the Freedom of Information Act 2000 requires that Norfolk and Suffolk Constabularies, when refusing to provide such information (because the information is exempt) are to provide you, the applicant, with a notice which:-

- (a) States that fact
- (b) Specifies the exemptions in question and
- (c) States (if that would not otherwise be apparent) why the exemptions applies.

The information is exempt from disclosure by virtue of the following exemptions:-

- Section 24(1) – National Security**
Section 31(1)(a)(b) – Law Enforcement

Section 24 and 31 are a qualified prejudice based exemptions and therefore we are obliged to consider the harm in disclosure and conduct a public interest test.

Evidence of Harm

The prevention and detection of crime is the foundation upon which policing is built and the threat from terrorism cannot be ignored. It is generally recognised in this current environment that the international security landscape is increasingly complex and unpredictable. The current UK threat level from international terrorism, based on intelligence, is assessed as 'severe' which means that a terrorist attack is highly likely. <https://www.mi5.gov.uk/threat-levels>

Providing the requested details would reveal tactical capability and is likely to provide sufficient information to those involved in criminal behaviour, with regards to systems used by the Constabularies for law enforcement purposes. This would lead to the platforms becoming vulnerable and consequently could weaken the IT infrastructure.

The prevention and detection of crime is the foundation upon which policing is built and the police have a clear responsibility to prevent crime, arrest those responsible for committing crime or those who plan to commit crime. However, there is also a duty of care to the public at large. The UK Police Service has a positive undertaking to protect the public from harm and that duty of care to all involved, must be the overriding consideration.

Public Interest Test

Section 24 – Factors favouring disclosure

Any disclosure made that would assist in public knowledge of how the Constabulary spends public funds would favour disclosure. This would also support the fundamental purpose of the Freedom of Information Act, which is to be more open and transparent to the way in which Constabulary polices the County, making us more accountable for our actions.

Such information disclosure may also assist in the public being better informed by our workings as Law Enforcers and the measures we have in place to ensure appropriate IT infrastructure. Fundamentally, disclosure would ensure the Constabularies are maintaining transparency in accordance with the Acts requirements.

Section 24 – Factors favouring non-disclosure

The Constabularies will have specific measures in place to ensure that the security of the community is protected. The provision of this information would identify the platforms that we use and therefore provide criminals with insight into any vulnerability.

It is difficult to establish to what extent disclosure would aid a terrorist however; we must not overlook the current national threat level, that being severe. Any disclosure of information confirming the platform we use would give detailed accounts of the overall IT infrastructure,

especially when coupled with information that is already publically available. Therefore, any such disclosure would, by its very nature, affect national security.

All UK police forces have a duty to fulfil their national security functions. The disclosure of this information would increase the risk to the safety of the public. The personal safety of the public is inextricably linked to national security and any information that could identify vulnerabilities would not be disclosed.

Section 31 – factors favouring disclosure

Disclosure of this information would enable the public to know whether the Constabulary has the appropriate capabilities to ensure IT systems are suitably protected.

The disclosure of this information would go some way to showing the public that funds have been spent appropriately, improving public debate.

Section 31 – factors favouring non-disclosure

To disclose details to this regard would provide hackers with knowledge of what platform is used, allowing them to identify weaknesses within the platform and exploiting them. The information could then be used to infiltrate the Constabularies systems and prejudice operational law enforcement, furthermore terrorists may use this information to assist them.

Balance Test

There is a public interest in the transparency of policing resources and providing assurance that the Police Service is appropriately and effectively utilising specific platforms, identifying that policing activity with regard to the delivery of law enforcement is appropriate and balanced.

The Police Service is charged with enforcing the law, preventing and detecting crime and protecting the community we serve. As part of that policing purpose, information is gathered which can be highly sensitive relating to high profile investigative activity. Weakening the mechanisms used to manage social media content would affect operational policing and the infrastructure of the nation.

Additionally anything that places the public confidence at risk, no matter how generic, would undermine any trust or confidence individuals have in the Police Service. Consequently, at this moment in time. It is our opinion that for these issues the balance test favours substantively exempting question 2.

As much as there is a public interest in knowing that the delivery of law enforcement is appropriate and balanced, this will only be overridden in exceptional circumstances

Therefore it is our opinion that for these reasons the balance test for disclosure is not made out.

Should you have any further queries concerning this request, please contact Clair Pack, FOI Decision Maker, quoting the reference number shown above.

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/>

Norfolk and Suffolk Constabularies are 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).

If you are unhappy with how your request has been handled, or if you think the decision is incorrect, you have the right to ask the Norfolk and Suffolk Constabulary to review their decision.

Ask Norfolk and Suffolk Constabularies to look at the decision again.

If you are dissatisfied with the decision made by Norfolk and Suffolk Constabularies under the Freedom of Information Act (2000), regarding access to information, you must notify the Norfolk and Suffolk Constabulary that you are requesting a review within 20 days of the date of its response to your Freedom of Information request. Requests for a review should be made in writing and addressed to:

*Freedom of Information Decision Maker
Information Management Department
Suffolk Constabulary
Police Headquarters
Martlesham Heath
Ipswich
Suffolk
IP5 3QS
OR
Email: information@suffolk.pnn.police.uk*

In all possible circumstances Norfolk and Suffolk Constabulary will aim to respond to your request for us to look at our decision again within 40 working days of receipt of your request for an internal review.

The Information Commissioner.

After lodging a request for a review with Norfolk and Suffolk 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