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10/03/2023

**FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 071/2023**

Thank you for your request for information regarding ACRO international services, which has now been considered.

**Applicant Question:**

'Regarding information on the international services section of the ACRO website.

[https://www.acro.police.uk/International-services-\(1\)/ISpublic](https://www.acro.police.uk/International-services-(1)/ISpublic)

1. The information listed in "Categories of data we hold", does international services have its own database with this information? And is this all information automatically shared from police forces upon an arrest of a UK national, or this information requested from a police force when a request in or out is received.

2. "When required, we will also exchange fingerprints (sensitive data) and custody images stored on our national criminal register". Is the national criminal register being referred to here IDENT1 or the PNC? Or a separate database international services hold with fingerprints / conviction information? If so, how does the information stored align with POFA?'

3. When someone successfully applies for deletion of a record through the record deletion process, and that application is approved in its entirety (for instance the applicant has been arrested once, without charge, that's the only information about them on the PNC and it's subsequently deleted).

When the record is erased, is the person record erased too? Or it now an "empty" person record.

Is there a way by looking up that person on the PNC to tell that they had a record which was deleted, or does that person no longer exist on the PNC at all?

**NPCC Response:**

The NPCC does hold some recorded information that answers part one of your request.

1. Any information received in accordance to the categories of data as outlined on our website is stored within an internal ACRO database. The database referenced is GSA, and is recorded in ACRO's contract with Geoffrey Smith Associates dated April 2022, which covers

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all GSA database products which are provided to ACRO.

Outside of the Freedom of Information Act, as a gesture of good will, my colleagues have provided the additional information to help answer your request.

'Based on knowledge, this data is not automatically shared by UK Police Forces upon arrest of a UK national with ACRO.'

2. The NPCC doesn't hold a recorded answer to part two of your request, however outside of the Freedom of Information Act as a gesture of good will, my colleagues have provided the additional information to help answer your request:

'Based on corporate knowledge, ACRO obtains fingerprints from our national criminal register i.e. PNC via IDENT1. There are automated processes written in to the PNC to ensure the deletion of biometric information (fingerprints held on IDENT 1 and DNA held on NDNAD) in accordance with the time frames set out in PoFA. This is outlined at 5.1.2 and Annex C and D of the NPCC Guidance ['Deletion of Records From National Police Systems \(PNC/NDNAD/IDENT1'\)](#).

ACRO hold fingerprints and conviction information in an internal database to facilitate the criminal conviction exchange process between the UK and country of request to EU and Non-EU countries in accordance with the EU-UK Trade and Co-operation Agreement 2020 and Interpol Protocols.

ACRO store local records in accordance with the 'NPCC National Guidance on the minimum standards for the Retention and Disposal of Police Records'. This is recorded on ACRO's Privacy Notice: [ACRO Criminal Records Office - Privacy Policy](#)

The data is manually submitted to ACRO by the arresting Police Force where there is a clear, identifiable link to a foreign country.

3. As above, the NPCC does not hold a recorded answer to part 3 of your request. Outside of the Freedom of Information Act as a gesture of good will, my colleagues have provided the below information to help answer your request:

'Based on knowledge, if a person only has one arrest event on PNC which resulted in no further action and there are no other records held on their PNC record (e.g. firearms certificate) and that arrest event is approved for deletion by the Controller under the [Record Deletion Process](#) then the entire PNC record (referred to as a stub record) which would have contained a person's nominal information (e.g. name, date of birth, address information etc) will also be deleted too. No 'empty' person record would remain on PNC.

Once a person's stub record has been deleted from PNC there is no way of looking up that person on PNC – it is as if they no longer exist on PNC.

Additionally to qualify the above response for Question 3, the Record Deletion Process *only* covers the deletion of national records held on the PNC, IDENT 1 (National Fingerprint Database) and NDNAD (National DNA Database). It does not extend to the records held on a police force's local systems (with the exception of custody images which, are eligible for review under the Record Deletion Process if that person is also seeking the deletion of their PNC record – this is outlined at Section 1.3 of the NPCC Guidance ['Deletion of Records From National Police Systems \(PNC/NDNAD/IDENT1'\)](#))

For full details on the legislation and the risk of harm, please see Annex A below.

Yours sincerely

**Fiona Greenlees**  
NPCC Freedom of Information Officer & Decision Maker

[www.npcc.police.uk](http://www.npcc.police.uk)

## **COMPLAINT RIGHTS**

### Internal Review

If you are dissatisfied with the response you have been provided with, in compliance with the Freedom of Information legislation, you can lodge a complaint with NPCC to have the decision reviewed within 20 working days of the date of this response. The handling of your request will be looked at by someone independent of the original decision, and a fresh response provided.

It would be helpful, if requesting a review, for you to articulate in detail the reasons you are not satisfied with this reply.

If you would like to request a review, please write or send an email to NPCC Freedom of Information, c/o PO Box 481, Fareham, Hampshire, PO14 9FS.

If, after lodging a complaint with NPCC, you are still unhappy with the outcome, you may make an application to the Information Commissioner at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

## Annex A

### Legislation – Section 16

- (1) It shall be the duty of a public authority to provide advice and assistance, so far as it would be reasonable to expect the authority to do so, to persons who propose to make, or have made, requests for information to it.