

c/o PO BOX 481
Fareham
Hampshire
PO14 9FS

Tel: 02380 478922

Email: npcc.foi.request@npfdu.police.uk

16/08/2023

FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 246/2023

Thank you for your request for information regarding ACRO's online forms, which has now been considered.

Applicant Question:

Please also advise me, as a FOI request, for each of your current forms available online, in the past two years (2021, 2022, and 2023):

1. The number of downloads for each available form (including complaint forms)
2. The number of successfully processed completed application forms
3. The number of hand delivered successfully completed application and complaints forms
4. The number of hand delivered unsuccessfully completed forms
5. Any and all similar complaints about these forms
6. The reason why (aside from your convenience and your customers inconvenience), the Records Deletion process is a two-step application?
7. The rationale for charging for some applications, but not others

NPCC Response:

The NPCC does hold some recorded information captured by question 2 of your request.

1. The NPCC does not hold recorded information captured by this request.
In wishing to assist you, outside of the Freedom of Information Act ACRO confirmed that both the new and old ACRO website only registered a download of forms as *clicks* on a page. Therefore, it cannot be distinguished from any other click that a user would have carried out on the page. Additionally based on knowledge, ACRO (currently and prior to the website going offline) have never utilised an online complaint forms so there are no figures held for this.
2. The NPCC does hold information captured by this question. I have provided the information in full:

Police Certificates

2021 - 132,956

2022 - 146,693

1st Floor, 10 Victoria Street, London SW1H 0NN T 020 7084 8950 F 020 7084 8951



2023 - 94,356 (up to end of 31/07/2023)

International Child Protection Certificates

2021 - 9,152

2022 - 11,454

2023 - 9,749 (up to end of 31/07/2023)

PNC Subject Access Requests

2021 - 38,049

2022 - 37,207

2023 - 15, 725 (up to end of 31/07/2023)

Record Deletion Process (RDP) - figures correct as of 07/08/2023. Please note that these numbers are for applications approved by the relevant force, processed and closed by ACRO. If this is not the information you are seeking, please come back to us.

2021 - 829

2022 – 703

2023 - 307

3. The NPCC does not hold information captured by this question.

In wishing to assist you, outside of the Freedom of Information Act, ACRO confirmed that they are based at a discreet location and do not have the facility to receive hand delivered application forms. ACRO are able to accept them via post to a PO Box address.

4. The NPCC does not hold information captured by this question. The explanation provided by ACRO is also relevant to this question.
5. The NPCC does not hold information captured by this question. No formal complaints have been recorded on ACRO's complaints log for the years 2021, 2022 and 2023.
6. The NPCC does not hold information captured by this question.

In wishing to assist you, outside of the Freedom of Information Act and as a gesture of goodwill, ACRO confirmed that this process is not a two-step application. The National Police Chiefs' Council Record Deletion Process is a National Process which ACRO administer on behalf of forces. A copy of the guidance is available on the ACRO website but for ease we have provided a copy, which is attached to this response letter.

ACRO collate the applications on behalf of forces to log and check the eligibility as set out at section 5.1 of the guidance. If eligible, the application is sent to the relevant Force as Controllers of that data on the Police National Computer for a Senior Officer to review. They will consider the application and make a decision on whether they consider the data should be retained or deleted. The Force relays this decision and the rationale to ACRO, who inform the applicant.

If an application does not match the criteria to be eligible for the process ACRO will inform the applicant with a rationale as to why it is not eligible.

This is not a two-step process but a way of ensuring that only the eligible applications get

forwarded to the Force and ensuring there is consistency in the approaches applied to the administration of the process.

7. The NPCC does not hold recorded information captured by your request.

In wishing to explain further, section 84 of the Freedom of Information Act relates to recorded information held by a public authority and that it does not extend to providing explanations unless the answers are already held in a recorded form.

"Information is defined in section 84 of the Act as 'information recorded in any form'. The Act therefore only extends to requests for recorded information. It does not require public authorities to answer questions generally; only if they already hold the answers in recorded form. The Act does not extend to requests for information about policies or their implementation, or the merits or demerits of any proposal or action - unless, of course, the answer to any such request is already held in recorded form." (Day vs ICO & DWP – EA/2006/0069 Final Decision)

Outside of the Freedom of Information Act, ACRO provided the following information by way of explanation.

We do not charge for the applications in respect of legislated Subject Rights requests made to the National Police Forces under the Data Protection Act 2018 as these need to be provided free of charge to the data subject. This applies to:

- Subject Access Requests for data held on the Police National Computer which ACRO process on behalf of Police Force under the s22a Collaboration Agreement.
- Record Deletion Process which relates to requests received for data to be deleted from the Police National Computer which ACRO process as a conduit for Police Forces.

We charge for searches conducted on the Police National Computer which relate to:

- Employment working with Children overseas – International Child Protection Certificate as this is not a Subject Right.
- For criminal data required when applying for a visa to travel or reside abroad – Police Certificate as this is not a Subject Right.

Yours sincerely

Fiona Greenlees

NPCC Freedom of Information Officer & Decision Maker

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.