

## NPFDU CRU PROCESS

1. Referral form received from a force, either as a mandatory referral or because the force require advice/stakeholder consultation.
2. Referral form contains personal details of the applicant: a minimum of the applicant's name, on occasion an email address or postal address (if supplied). Forces should only complete the details necessary for the CRU to log the request and be able to locate it.
  - *Providing the applicants name allows the CRU to check if other forces have also sent the request for advice. It allows checks for duplication, repeat requests and vexatious considerations. The email or postal address allows checks when considering applicants working in concert with each other, as would the organisation name.*
3. Once a referral form is received the details from the form are input into cycffreedom (records management system) and a reference number generated. An acknowledgement email is sent to all forces who have the same request, stating this CRU reference number, and includes the applicant's surname name only.

The emailed referral form is then deleted from the inbox.

  - *Each force generates their own reference numbers, therefore they will not be able to locate their request using the CRU reference number. The name is included in the acknowledgement email for the purposes of identification.*
4. If stakeholder engagement is required the CRU reference number is used to identify the request. The applicant's name is not required and therefore not provided to any 3<sup>rd</sup> party.
  - *This is articulated within the [College of Policing APP](#) which states "The identity of the applicant should not be shared with information owners, or third party stakeholders, unless there is a policing purpose in doing so, for example intelligence gathering."*
5. When CRU respond to forces providing guidance, the advice contains the CRU reference number and the applicants surname name to enable forces to locate each request.
  - *The name of the applicant is only used as a reference, advice is provided on an "applicant blind" basis. The name is only used in correspondence where proportionate and necessary.*
6. As per point 4, when consultation is required the applicant's personal details are not referenced to ensure that the consultation process is 'applicant blind'. The data included in this consultation process is therefore not considered the personal data of the applicant.
7. Should a case progress to ICO Appeal or Tribunal stage, then applicant details are shared as at point 5, for the purposes of case retrieval.
8. Cases requiring consultation at bi-monthly stakeholder meetings will include the applicants name on the circulation log.

- *Providing the applicants name allows stakeholders to identify requestors making requests across government and the need to ensure a joined up approach to safeguard national security*
  
- 9.** Once the case is closed on cyfreesdom and advice has been provided to forces, the associated correspondence is deleted from CRU email folders in line with national guidance [NPCC Review Retention and Disposal Schedule 2020 Version 4 FINAL.pdf](#)
  
- 10.** Cases on cyfreesdom are kept for a minimum of 4 years to accommodate the length of time it takes for ICO complaints and tribunals to come to a conclusion.
  
- 11.** Deletion of records to start the first week of January in each rolling year.