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10/07/2025

**FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 2347/2025**

Thank you for your request for information regarding cross-force access; which has now been considered.

**Applicant Question:**

This request concerns the **cross-force access to biometric, misconduct-related, and other special category data via the Police National Computer (PNC)** by the Cambridgeshire-led **Professional Standards Department (PSD)** under the tri-force policing collaboration with Bedfordshire and Hertfordshire Constabularies.

The subject matter raises **grave and unresolved questions** around data protection compliance, internal governance, access control, and oversight in relation to the PNC and associated systems. I am therefore seeking the following information, covering the **period from January 2018 to the present**, unless otherwise specified.

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**REQUESTED INFORMATION**

**1. Legal Basis and Data Sharing Frameworks**

- a. Please provide copies of any **Data Sharing Agreements, Joint Controllership Agreements, or Memoranda of Understanding** governing access to PNC or PNC-derived data by PSD personnel in one force (e.g. Cambridgeshire) when investigating officers or incidents originating in another (e.g. Hertfordshire).
- b. Please confirm whether any **internal legal reviews, DPIAs, or information sharing impact assessments** have been conducted in relation to this cross-force use of PNC data for internal misconduct investigations.
- c. If no such agreements or assessments exist, please confirm this explicitly.

**2. Oversight and Accountability Mechanisms**

- a. Please describe the **governance structures and national oversight mechanisms** in place to regulate and audit PSD access to PNC data under cross-force arrangements.

- b. Has ACRO, the NPCC, or any Home Office body issued **guidance or enforcement notices** concerning the management of tri-force or collaborative PSD data access to PNC?
- c. Are there any **published or internal audit findings or reviews** relating to misuse or overreach of access to PNC data by Professional Standards Departments since 2018?

### 3. Technical Access Controls and Logging

- a. Please explain what **role-based access control mechanisms** are enforced on PNC or affiliated systems to restrict PSD personnel from one force accessing sensitive data originating from another.
- b. What **audit trail systems or automatic alerts** are in place to log and flag access by cross-force personnel to biometric or internal misconduct records?
- c. Are any **systematic compliance checks or user access reviews** conducted across tri-force PSD access to PNC or internal force databases?

### 4. Transparency and Data Subject Rights

- a. Is it national or force policy to **notify data subjects** when their biometric or misconduct-related data is accessed by officers in a different force?
- b. Please provide copies of any guidance issued on **data subject transparency**, notification, or redress when cross-force access occurs.
- c. If no such policy exists, please confirm this clearly.

### 5. Controllership, Liability and Reporting

- a. Who is considered the **data controller** under UK GDPR and the Data Protection Act 2018 when PNC-linked data is accessed by PSD investigators from another force?
- b. Please provide any **NPCC or ACRO guidance or policies** regarding **liability**, redress, or internal reporting obligations in the event of inappropriate or excessive cross-force access.
- c. Has ACRO received or logged **any complaints, breach reports, or internal referrals** relating to the use of PNC data in tri-force or cross-force PSD investigations since January 2018?

#### NPCC Response:

1. A) The NPCC PNC Portfolio does hold information captured by your request and I have attached to this letter, Police National Computer (PNC) Joint Controllership Agreement (JCA) – detailing arrangements made under Section 58 of the Data Protection Act 2018 (DPA) and Article 26 of the UK General Data Protection Regulation (UK GDPR).

The NPCC does not hold recorded information captured by parts 1b and 1c.

2. The NPCC does not hold recorded information captured by parts 2a to 2c.

3. The NPCC PNC Portfolio does hold recorded information captured by your request. Only PNC trained officer and staff are able to view PNC products. Once trained in a specific product, e.g. names, vehicles etc, they have access to all records. There are restrictions on updating PNC records.

The NPCC does not hold recorded information captured by parts 3b and 3c.

4. The NPCC does not hold recorded information captured by part 4a to 4c.
5. The NPCC PNC Portfolio does hold recorded information captured by your request. This information is provided to you at part one of this response is captured by part 5a and 5b.

The NPCC does not hold recorded information captured by part 5c.

Normal Standard of proof to apply in determining whether a public authority does hold any requested information is the civil standard of the balance of probabilities. In deciding where the balance lies, the Information Commissioner considers the scope, quality, thoroughness and results of the searches carried out by the public authority as well as considering where appropriate, any other reasons offered by the public authority to explain why the information is not held.

Checks have also been made with the NPCC portfolio(s) for Professional Standards, Data Protection Officer and ACRO who confirm(s) no information held.

I have undertaken all of the necessary checks in establishing whether information is held which is captured by your request and any necessary steps with regard to retrieval of such information.

Searches have been conducted with the NPCC portfolio(s) that relates to the subject matter and I am satisfied that the search conducted to locate the information that you have requested has been robust.

I have conducted research on your behalf and the following [direct web-link](#) to the College of Policing website which provides further information, guidance and code of practice for PNC.

The College of Policing is a professional body for everyone working across policing.

A further consideration for you is to make a request with individual police forces.

Unfortunately, I do not hold a public facing list of force FOI contact details, however they will be available [here](#).

You are able to send a request to multiple forces by way of one email, with each force having a lawful responsibility under the Act to respond to you.

Yours sincerely

Sherry Traquair  
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 40 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.

Any request for an internal review will be acknowledged and responded to, **based on the specific wording of your initial request only.**

**We ask that any rationale to request an internal review, does not include any requests for new information and ask that these be submitted by separate email. We will acknowledge as a new request and may aggregate to your initial request in compliance with the legislation.**

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.

## **Annex A**

Section 17 of the Freedom of Information Act 2000 requires the NPCC, when refusing to provide information by way of exemption in question and (c) states why the exemption applies. In accordance with the Freedom of Information Act 2000 this letter acts as a refusal notice to those aspects of your request.

### **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.