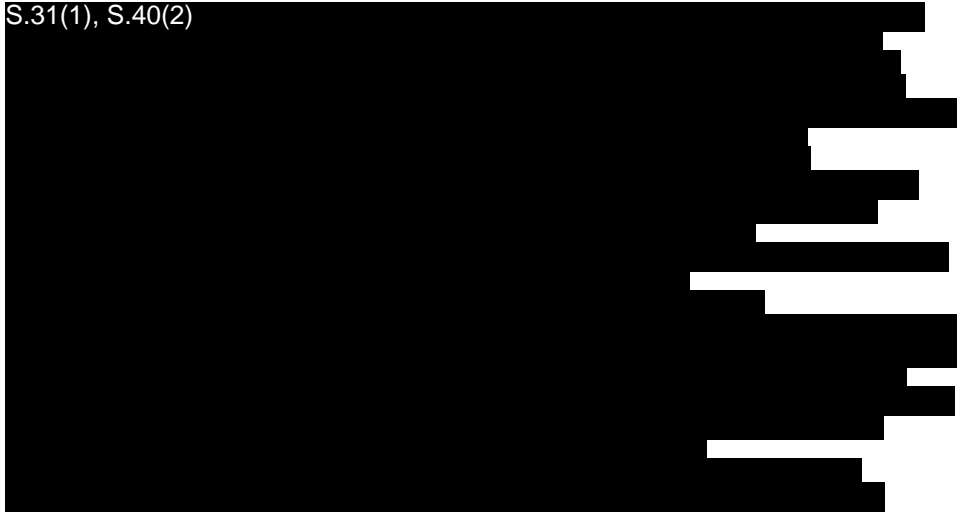


From: [NPCC CRU Mailbox](#)
Bcc: S.31(1), S.40(2)



Subject: CRU reference: 01/CRF/25/004777/Z - Request logged - Advice to Follow
Date: 23 April 2025 12:35:00
Attachments: [image001.png](#)
[image002.png](#)

Dear All,

The below FOI request has now been logged in the CRU. **Please let us know if you have received it.** Advice will follow in due course.

Our reference: 01/CRF/25/004777/Z

Referred by: BCH Constabularies, Derbyshire Constabulary, Nottinghamshire Police

Sent from: S.40(2)

The Applicant name is included in the acknowledgement email as a reference for forces only, any future correspondence will only quote the CRU reference number. Please do not duplicate the applicant name in any future correspondence and use only the CRU reference number

Applicant's request:

I am writing to request the following information relating to Facial Matching Checks conducted by His Majesty's Passport Office on behalf of your force:

- A copy of any policy held by your force governing the use of these checks, or any Data Protection Impact Assessment regarding these checks as used by your force
- A copy of any breakdown for the crime types linked to the searches requested by your force (whatever level this is held at, whether specific offence, offence types, etc) for calendar year 2024
- The number of requests to HMPO for facial matching checks by your force in 2024, and 2025 as of the date of this request

Kind regards,

S.40(2)

Management Assistant

National Police Freedom of Information and Data Protection Unit

National Police Chiefs' Council

 NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)



From: [NPCC CRU Mailbox](#)
To: S.40(2)
Cc: S.40(2)
Subject: RE: FOI requests by Big Brother Watch for facial image searches of the Passport database CRU Ref 25/4777
Date: 09 May 2025 13:37:00
Attachments: [image001.png](#)
[image002.png](#)

Afternoon S.40(2)

The CRU are aware of this request and can confirm it has been received by all forces. This is currently waiting CRU advice, so I will add this email to the case file so the case officer can liaise with your colleagues once picked up.

Kind regards

S.40(2)

Deputy Manager

National Police Freedom of Information and Data Protection Unit (NPFDU)

National Police Chiefs' Council

 NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)

S.40(2)



From: S.31(1), S.40(2)

Sent: 09 May 2025 10:22

To: NPCC CRU Mailbox S.31(1)

Cc: S.31(1), S.40(2)

Subject: FOI requests by Big Brother Watch for facial image searches of the Passport database

Dear colleague

I am contacting you as we are noticing a series of FOI requests from S.40(2) to various Police Forces.

Two forces, Northants S.40(2) and Derbyshire (via S.40(2) Management Assistant, National Police Freedom of Information and Data Protection Unit National Police Chiefs' Council) have approached us in the last couple of weeks with the same questions:

I am writing to request the following information relating to Facial Matching Checks conducted by His Majesty's Passport Office on behalf of your force:

- A copy of any policy held by your force governing the use of these checks, or any Data Protection Impact Assessment regarding these checks as used by your force*
- A copy of any breakdown for the crime types linked to the searches requested by your force (whatever level this is held at, whether specific offence, offence types, etc) for calendar year 2024*
- The number of requests to HMPO for facial matching checks by your force in 2024, and 2025 as of the date of this request*

S.40(2) has also approached us with similar questions.

The background is that Big Brother Watch has mounted a legal challenge against the Home Office and the Metropolitan Police for sharing the images of criminal suspects and the Home Office running them against the immigration and passport databases. **S.31(1)**

S.40(2) They already have the figures we collate for checks that we carry out, so I suggest that they are attempting to see whether the figures held by individual Police Forces match the data we have provided to them.

I imagine that **S.40(2)** approach is not just confined to two forces so I am alerting you to suggest that there is central oversight of these requests in order to ensure a consistent response. Our response to FOIs on the subject has been overseen by my colleagues **S.40(2)** in Data and Identity Directorate so I am copying them into this email as well as **S.40(2)** from South Wales Police with whom I have liaised in the past on facial recognition issues.

Regards

S.40(2)

Evaluation and Response,
Cross Cutting Operations,
Passports, Citizenship and Civil Registration,
Customer Services,
Warehouse K, Home Office East London Campus, London E16 1DR

S.31(1)

This email and any files transmitted with it are private and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please return it to the address it came from telling them it is not for you and then delete it from your system. This email message has been swept for computer viruses.

From: [NPCC CRU Mailbox](#)
Bcc: S.31(1), S.40(2)

Subject: CRU reference: 01/CRF/25/004777/Z - Update - PIT extension required
Date: 19 May 2025 13:07:00
Attachments: [image001.png](#)
[image002.png](#)

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Good afternoon,

To update all forces, we are currently consulting on the above referenced national request, and this will take the referral past its due date. As such, if you have not already done so, our advice is to PIT extend s31 to allow for the relevant consultation to take place. I have included some wording below to help.

'FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: XXX'

I wish to advise you that the following exemption is engaged in relation to your request:

Section 31 Law Enforcement.

By virtue of Section 31, where public authorities have to consider the balance of the public interest in relation to a request, they do not have to comply with the request until such times as is reasonable in the circumstances.

This is a qualified exemption and there is a requirement to conduct a public interest test. I am obliged to consult with all stakeholders who may be affected by me complying with your request.

Upon completion of this process I am then required to ascertain where the balance in compliance with both my duty to confirm or deny what information exists and/or in disclosure of any relevant information.

This process is ongoing, and when considering these matters I am entitled to extend the deadline for complying with your request.

Unfortunately, this does mean that <<FORCE NAME>> will not be able to respond to your request in full within 20 working days of the original receipt.

The new estimated date for compliance will be XXXX. If you have any queries about this letter,

please contact me.'

Kind regards

S.40(2)

[Redacted]

National Freedom of Information Referral Officer
National Police FOI & DP Central Referral Unit (NPFDU)
National Police Chiefs' Council

✉ NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1) [Redacted]

[Redacted]



From: [Freedom of Information Mailbox](#)
To: [NPCC CRU Mailbox](#)
Subject: CRU reference: 01/CRF/25/004777/Z - Request logged - Advice to Follow
Date: 19 May 2025 13:14:51
Attachments: [image001.png](#)
[image002.png](#)
[Dept. Response for FOI-584.docx](#)
[114_NPCC-HO-PS-PSNI_S.23\(1\) UmbrellaDSAV1.0\(UDSA\)_2024.pdf](#)
[PDSA-HomeOffice-NorthumbriaForceIntelligenceBureau\(in.docx](#)

Good afternoon,

We're aware that we're awaiting your advice for this.

Our researching department has advised what is held by us to respond to the request (attached), but raised some concern in releasing the attached other 2 documents to the requestor.

If you could kindly include the consideration of these on your advice, please.

Kind regards,

S.40(2)
Disclosure Assistant
Information Management

S.31(1) **W:** www.northumbria.police.uk

We are a flexible working organisation. Please only respond to this email in your own working hours.

'Our vision is to deliver an outstanding police service; working with communities to prevent crime and disorder and protect the most vulnerable people from harm.'

From: Freedom of Information Mailbox **S.31(1)**
Sent: 23 April 2025 13:40
To: NPCC CRU Mailbox **S.31(1)**
Subject: CRU reference: 01/CRF/25/004777/Z - Request logged - Advice to Follow

Dear All

Northumbria confirm receipt of this request also.

As always, we look forward to receiving your advice/guidance.

Kind regards

S.40(2)
Partnership Coordinator
Information Management

M: **S.31(1)** **W:** www.northumbria.police.uk

We are a flexible working organisation. Please only respond to this email in your own working hours.

'Our vision is to deliver an outstanding police service; working with communities to prevent crime and disorder and protect the most vulnerable people from harm.'

From: [NPCC CRU Mailbox](#)
To: [Requests](#)
Subject: RE: [EXTERNAL] CRU reference: 01/CRF/25/004777/Z - Update - PIT extension required
Date: 19 May 2025 15:04:00
Attachments: [image001.png](#)
[image002.png](#)

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Good afternoon **S.40(2)**

Thank you for letting us know. If this is going to be a s12(2) response then there is no issue with you proceeding with that now.

However you are likely aware this is a national request which captures external stakeholders. As such I am hesitant to provide comments on any response other than a 12(2) until I have details back from relevant parties, this will ensure advice is consistent for all in the end. Therefore, if you are considering s12(1), please may we ask that you PIT extend as advised instead? The PIT extension does capture consideration of the requirement to confirm and deny as well as to disclose, so it is still applicable in your case.

We will of course come back to you as soon as possible.

Kind regards

S.40(2)

National Freedom of Information Referral Officer
National Police FOI & DP Central Referral Unit (NPFDU)
National Police Chiefs' Council

 NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)

[REDACTED]



From: **S.31(1), S.40(2)** **On Behalf Of** Requests

Sent: 19 May 2025 13:17

To: NPCC CRU Mailbox **S.31(1)**

Subject: RE: [EXTERNAL] CRU reference: 01/CRF/25/004777/Z - Update - PIT extension required

Morning,

Thank you for the below update.

We have determined that to obtain the information requested would exceed cost (Questions 2 and 3)

Please advise that you are happy for us to proceed with a S.12 response and not PIT extend this?

Thanks

S.40(2) [REDACTED] **Request Compliance Officer**

Cheshire Constabulary

S.31(1) [REDACTED]

Visit www.cheshire.police.uk

Follow [@cheshirepolice](https://twitter.com/cheshirepolice)

Like Cheshire Police on Facebook

From: [NPCC CRU Mailbox](#)
To: [NPCC Data Protection Mailbox](#)
Subject: CRU ref: 4777/Z - Views sought DSA's captured
Date: 02 June 2025 10:38:00
Attachments: [image001.png](#)
[image002.png](#)
[114_NPCC-HO-PS-PSN^{S.23\(1\)}_UmbrellaDSAV1.0\(UDSA\)_2024.pdf](#)
[PDSA-HomeOffice-NorthumbriaForceIntelligenceBureau.docx](#)

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Hi team,

We have a request for advice as follows:

I am writing to request the following information relating to Facial Matching Checks conducted by His Majesty's Passport Office on behalf of your force:

- A copy of any policy held by your force governing the use of these checks, or any Data Protection Impact Assessment regarding these checks as used by your force
- The number of requests to HMPO for facial matching checks by your force in 2024, and 2025 as of the date of this request
- A copy of any breakdown for the crime types linked to the searches requested by your force (whatever level this is held at, whether specific offence, offence types, etc.) for calendar year 2024

It appears the attached 2 documents are held by some forces. As NPCC are party to them both, I felt it prudent to forward these to you for awareness and any comments you wish to make re: redactions. To note, I have also sought the views of the Home Office **S.23(1)**

[REDACTED]
[REDACTED] In addition to these, obviously all personal data will be redacted.

If there is anything further you want redacted please let me know the details. Comments by midday Thursday 05/06/25 would be appreciated.

Thanks & Kind regards

S.40(1)
[REDACTED]

National Freedom of Information Referral Officer
National Police FOI & DP Central Referral Unit (NPFDU)
National Police Chiefs' Council

 NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)
[REDACTED]



From: NPCC Data Protection Mailbox
Sent: 02 June 2025 12:58
To: NPCC CRU Mailbox
Subject: RE: CRU ref: 4777/Z - Views sought DSA's captured

Thanks, Sal – S.23(1)

I'm sure the Umbrella has been released before so I'll do some digging.

Regards,

S.40(2)
NPFDU Data Protection Manager & NPCC Data Sharing Coordinator
S.31(1), S.40(2)

From: NPCC Data Protection Mailbox
Sent: 02 June 2025 12:10
To: NPCC CRU Mailbox <npcc.advice@npfdu.police.uk>
Subject: RE: CRU ref: 4777/Z - Views sought DSA's captured

Hi Sally,

The pdf Umbrella is the overarching framework agreement for sharing data between all of the parties (NPCC forces, Police Scotland, PSNI, S.23(1) the Home Office).

- There should be no issues with releasing this document under FOI as it has been previously released in full (notwithstanding removal of any personal data).
- S.23(1)

The Umbrella is supported by a template process-specific data sharing agreement that can be adapted for any particular sharing activity between any of the parties. The Word document is an adaptation of the PDSA template between individual forces and HMPO (under HO) that has been amended for use by Northumbria Police.

- Each force should make their own decision on disclosure (particularly re contacts), but there should be no issues (notwithstanding removal of any personal data).
- This is a consistently used adaption of the PDSA template for HMPO use that only allows very minor changes locally by each force (adding their contact details etc.) so the requester should get 43+ versions of the same doc with those changes.

Regards,

S.40(2)
NPFDU Data Protection Manager & NPCC Data Sharing Coordinator
S.31(1), S.40(2)

From: [NPCC CRU Mailbox](#)
To: [!Freedom of Information \(Surrey\); NPCC CRU Mailbox](#)
Subject: RE: Outstanding Advice
Date: 16 June 2025 10:57:00

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Good morning S.40(2)

Thank you for your email. Please see below the updates for these cases:

CRU reference: 01/CRF/25/004852/T – We are sorry but at present a caseworker has not yet been assigned to this case. We are currently working through a backlog and we sincerely appreciate your patience and understanding during this time, but please rest assured that we are doing our very best to progress cases as efficiently as possible, and we will be in touch as soon as we have formulated the advice for you.

CRU reference: 01/CRF/25/004777/Z – The caseworker is currently still consulting with stakeholders on this case and will have advice out to you as soon as possible once we hear back from them.

If there is anything else you need please just let us know.

Kind Regards

S.40(2)

[Redacted]

[Redacted]

NPFDU FOI Referral Officer

National Police Freedom of Information and Data Protection Unit | National Police Chiefs Council
,NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)

' Via MS Teams

Advanced notification of leave:

From: !Freedom of Information (Surrey)

Sent: 16 June 2025 10:08

To: NPCC CRU Mailbox

Subject: Outstanding Advice

Hi there,

We may have missed the updates, if we have, I apologise, but can you assist with the advice supplied regarding the below:

CRU reference: 01/CRF/25/004852/T and,

CRU reference: 01/CRF/25/004777/Z

Many thanks,

S.40(2)

Decision Maker

Information Access Team

Corporate Development
Surrey Police
General non-emergency no.: 101
Address – Surrey Police, PO Box 101, Guildford, GU1 9PE
<http://www.surrey.police.uk>

The Surrey Police Privacy Notice including your personal data rights is available on the Surrey Police website or on this link:

<https://www.surrey.police.uk/about-us/your-right-to-information/information-about-us/privacy/>

Surrey Police – With You, Making Surrey Safer

From: [NPCC CRU Mailbox](#)
To: [FreedomOfInformation](#); [NPCC CRU Mailbox](#)
Cc: **S.40(2)**
Subject: RE: CRU reference: 01/CRF/25/004777/Z - Update - PIT extension required
Date: 16 June 2025 11:43:36
Attachments: [image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)
[image007.jpg](#)
[image008.png](#)
[image009.png](#)
[image001.png](#)

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Good morning,
Thank you for your email.

The caseworker is still currently consulting with stakeholders on this case. We are aware that this is due and will have advice out to you as soon as possible once we hear back from the stakeholders.

Kind regards

S.40(2)

[Redacted]

[Redacted]

NPFDU FOI Referral Officer

National Police Freedom of Information and Data Protection Unit | National Police Chiefs Council
NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)

* Via MS Teams

Advanced notification of leave:

S.40(2)

From: FreedomOfInformation

Sent: 16 June 2025 11:18

To: NPCC CRU Mailbox

Cc: **S.40(2)**

Subject: RE: CRU reference: 01/CRF/25/004777/Z - Update - PIT extension required

Good morning CRU!

As advised below, we applied a S.31 PIT extension on this request on the 19th May.

As I am sure you are aware, this request is now due for Gwent Police and all other forces today. I was hoping you could provide an update on when the advice is likely to be received.

Many thanks,

Cofion gorau | Kind regards



Rhyddid Gwybodaeth / Freedom of Information

Uned Datgelu | Disclosure Unit

Gwasanaethau Gwybodaeth | Information Services

Heddlu Gwent Police

Ffôn | Tel: **01633 642115**

S.31(1)

[Redacted]

[Redacted]

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.

Byddwn yn ymateb yn brydlon ac yn gydradd a byddwn yn ymateb yn eich iaith o ddewis.

We welcome correspondence in Welsh and English.

We will respond in a timely and equal way to both and will reply in your language of choice.

From: [NPCC CRU Mailbox](#)
Bcc: S.31(1), S.40(2)

Subject: CRU ref: 4777/Z - update
Date: 17 June 2025 10:17:00
Attachments: [image007.jpg](#)
[image008.png](#)
[image009.png](#)

Good morning all,

We are aware of the national referral detailed below and would like to provide an update on behalf of the unit.

The CRU is actively engaging with our external stakeholders, whose input is essential in determining the appropriate course of action regarding the information received. It is critical that we obtain their views before proceeding further.

Regrettably, despite our continued efforts and emphasis on the urgency of the matter, progress has been limited due to ongoing delays in stakeholder responses.

We understand that most forces have already extended their PIT deadlines, in many cases until Thursday 19th. However, based on the current situation, it is unlikely that the CRU will be in a position to provide definitive advice by that date. We also have genuine concerns regarding potential harm that must be carefully considered before finalising our position.

With this in mind, we strongly advise forces to await our guidance. We are working diligently to provide an update by Friday 20th or, at the latest, Monday 23rd.

We appreciate your patience and understanding as we navigate these external dependencies. In the meantime, we kindly request that no further chasers be sent regarding this referral.

Thank you for your cooperation.

Many thanks



S.40(2)

Head of National Police Freedom of Information and Data Protection Unit
National Police Chiefs Council
NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

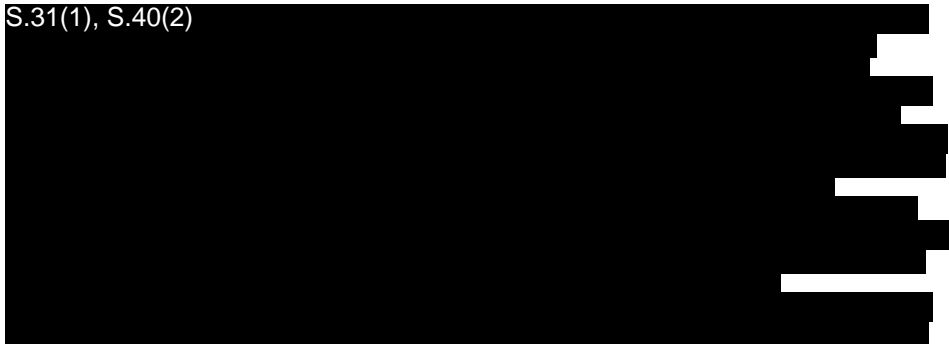
S.31(1)

S.31(1),



S.40(2)

From: [NPCC CRU Mailbox](#)
Bcc: S.31(1), S.40(2)



Subject: CRU ref: 25/4777/Z - Facial matching searches - Including Advice
Date: 23 June 2025 13:11:00
Attachments: [image001.png](#)
[image002.png](#)

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Dear All,

The below FOI request was logged in the CRU. **Advice is at the end of this message.** Sincere apologies for the delay in providing this.

Our reference: 25/4777/Z
Referred by: National

Applicant's request:

I am writing to request the following information relating to Facial Matching Checks conducted by His Majesty's Passport Office on behalf of your force:

- A copy of any policy held by your force governing the use of these checks, or any Data Protection Impact Assessment regarding these checks as used by your force
- A copy of any breakdown for the crime types linked to the searches requested by your force (whatever level this is held at, whether specific offence, offence types, etc) for calendar year 2024
- The number of requests to HMPO for facial matching checks by your force in 2024, and 2025 as of the date of this request

CRU Advice:

Advice is provided on the assumption all the requested information can be located and retrieved within the cost threshold. Where that is not the case, s12 is recommended to be used. When issuing your refusal notice we recommend you notify the applicant how best to refine their request, if feasible to do so. If cost is not a factor then the following advice applies:

Question 1

Information is in the public domain from official sources which confirms forces can request such searches, [here](#) for example. Forces can therefore confirm or deny they hold information for this question. Thereafter, local assessment of any force specific documents will be required in line with s31(1) and s40(2). There could be s24(1) considerations, but this will depend upon exactly what is held – we refer you to your force teams in the first instance to establish this. Where it is identified that s24(1) needs to be included in your response, please provide us with a copy of your draft with redacted information highlighted prior to release as stakeholders will need to be consulted. If s24(1) is not being included and all you hold are local documents, we need no further sight.

If you hold any national documents (from NPCC, Home Office, College of Policing, **S.23(1)**) please let us know exactly what you hold as we will need to consult with the relevant stakeholders on any required redactions prior to release. Thus far, no one has done so except one force who have advised us they hold the below. Given what they are, we suspect others may hold these, therefore advice on them is also below. We do not need to be further consulted on these documents. However, any other national docs will need to be sent to us for consultation.

Overarching Umbrella Data Sharing Agreement (USDA) between Home Office, NPCC, PSoS, PSNI and **S.23(1)** v4.0.

We have identified that this document is in the public domain, therefore if held, s21 can be cited and the applicant directed to the relevant link - <https://www.npcc.police.uk/About-Us/governance-and-accountability/foi-and-subject-access-request/national-police-freedom-of-information-and-data-protection-unit-npfd/>

Process-specific Data Sharing Agreement (PDSA) in respect of access to HM Passport office data in relation to the Data Validation Application Digital (DVA: Digital) User interface (UI) subject to the USDA v4.0 between the Home Office, NPCC, PSoS, PSNI **S.23(1)**

We have been advised that process specific data sharing agreements may be held by a number of forces. Our understanding is that these documents are principally templated, but are amended individually with force contact details etc. Our expectation therefore is that PDSA's captured here will more or less all be the same for each force, with only minor contact details amended, therefore we have sought advice from stakeholders on the main content of the PDSA we have been provided and they have supplied us with the redactions they require. If you hold a PDSA of this nature, we need no further sight of this document provided you are content to make the below redactions to it.

- Personal data should be redacted s40(2). It is for forces to determine their own personnel who require redaction, including their names and email addresses.
- HO have advised they require redaction of the below emails under s31(1) 'law enforcement' and s40(2) personal information. s31 is engaged where s40(2) is not (group emails for example rather than personal ones) because releasing email addresses would allow criminals, and anyone intent on hampering law enforcement duties, to bombard these email addresses with spam mail therefore directly and indirectly impacting on the prevention and detection of crime.

S.31

S.23(1)

Question 2 & Question 3

After extensive consultation on these questions, our advice is that information can be confirmed or denied as held. Release of any total figures for Q3, where they are held, should be thoroughly locally assessed by forces to ensure that law enforcement is not undermined (s31) or that individuals are not identifiable through disclosure (s40(2)). Although it is ultimately a force decision, in our view, unless the total number of searches requested (Q3) is very low and/or could be used in conjunction with other publically available information to identify a specific investigation or person, then harm would appear minimal and numbers could be given.

Crime types as asked for at Q2 are likely to be more sensitive to reveal if held – especially given the scope of the crimes for which these requests can be made. We note that the applicant does not specify they want the number of requests by each crime type so we would recommend that, if a disclosure is to be made, only a generic list of offences is given without any numbers against each. The use of s31(1) and/or s40(2) exemption against this information will depend on exactly what is held/whether anything relates to ongoing investigations etc., or anything could identify an individual (as above). For that reason, local assessment has been agreed with stakeholders as an appropriate course of action to be taken by forces individually in this case.

Kind regards

S.40(2)

National Freedom of Information Referral Officer
National Police FOI & DP Central Referral Unit (NPFDU)
National Police Chiefs' Council

📧 NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)



-

From: [NPCC CRU Mailbox](#)
To: [Freedom of Information](#)
Subject: RE: CRU ref: 25/4777/Z - Facial matching searches - Including Advice
Date: 23 June 2025 15:18:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.jpg](#)
[image004.png](#)

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Hi **S.40(2)**

As the advice is that you can confirm or deny information is held then a nil is OK to disclose for 2 & 3.

Kind regards

S.40(2)

National Freedom of Information Referral Officer
National Police FOI & DP Central Referral Unit (NPFDU)
National Police Chiefs' Council

 NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)

S.31(1)



From: Freedom of Information **S.31(1)**

Sent: 23 June 2025 14:37

To: NPCC CRU Mailbox **S.31(1)**,

Subject: RE: CRU ref: 25/4777/Z - Facial matching searches - Including Advice

Good afternoon all,

For questions 2 and 3, are you happy for Staffordshire to disclose nil?

Kind regards,

S.40(2)

Freedom of Information Team within the Central Disclosure Unit

cid:image001.jpg@01DA8050.5AF3D840





Staffordshire Police

S.31(1)

From: [NPCC CRU Mailbox](#)
To: [Freedom of Information](#)
Subject: RE: CRU ref: 25/4777/Z - Facial matching searches - Including Advice
Date: 24 June 2025 08:23:00
Attachments: [image001.png](#)
[image002.png](#)

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Hi **S.40(2)**

The comments make sense for Q1 and NIH is fine, but your SPOC's comments talk about *conducting* checks for HMPO; Q3 and Q2 refer to *requests for searches to be conducted by HMPO* and from our advice you will see that this is an option forces do have, so it's worth double checking that is what has been checked as held or not before proceeding with NIH overall. If nothing is held for requests then NIH can be stated for the request as a whole.

Kind regards

S.40(2)

National Freedom of Information Referral Officer
National Police FOI & DP Central Referral Unit (NPFDU)
National Police Chiefs' Council

✉ NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1), S.40(2)

S.40(2)



From: Freedom of Information **S.31(1)**
Sent: 23 June 2025 15:12
To: NPCC CRU Mailbox **S.31(1)**
Subject: RE: CRU ref: 25/4777/Z - Facial matching searches - Including Advice

Good Afternoon **S.40(2)**

I have conducted all the relevant searches within our force including reviewing sharing agreements and for GMP this would be a no information held response.

Our intelligence and Facial Recognition SPOC within FIB confirmed - **S.31(1)**

S.31(1)

S.31(1)

Is it okay to provide the applicant with a no information held response for the whole request?

Thanks

Kind Regards

S.40(2)

**Information Access Caseworker
Information Compliance & Records Management Unit|Greater Manchester Police**

***not protectively marked**

From: [NPCC CRU Mailbox](#)
To: S.40(2)
Subject: RE: CRU ref: 25/4777/Z - Facial matching searches - Including Advice
Date: 24 June 2025 08:24:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)

OFFICIAL - SENSITIVE
POLICE EYES ONLY

Not to be distributed outside of the Police network or other agencies without prior authorisation from the CRU

Hi S.40(2)

Only a few forces have told us what they hold, and 1 has advised they hold nil, so it's plausible, but I couldn't really comment on whether that sounds correct for your force specifically. NIH can be stated if you are satisfied it is the case though.

Kind regards

S.40(2)

National Freedom of Information Referral Officer
National Police FOI & DP Central Referral Unit (NPFDU)
National Police Chiefs' Council

 NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)



From: S.31(1), S.40(2)
Sent: 23 June 2025 15:43
To: NPCC CRU Mailbox S.31(1)
Subject: RE: CRU ref: 25/4777/Z - Facial matching searches - Including Advice

Good afternoon CRU

Thank you for the advice.

I have been told by our DP Unit and Policies Unit that we don't have anything. Does this seem right? Have other forces said they don't hold anything?

Kind regards

S.40(2)

Decision Maker

Force Disclosure Unit
Police Headquarters, London Road, Devizes,
Wiltshire SN10 2DN

From: [NPCC CRU Mailbox](#)
To: ["Information Rights Requests"](#)
Subject: CRU reference: 01/CRF/25/004969/B - Your reference: FOI 479/25 - IR logged - Advice to Follow
Date: 25 June 2025 14:32:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.jpg](#)

Dear All,

The below internal review has now been logged in the CRU. Advice will follow in due course.

Our reference: 01/CRF/25/004969/B

Referred by: Cleveland

Sent from: **S.40(2)**

The Applicant name is included in the acknowledgement email as a reference for forces only, any future correspondence will only quote the CRU reference number. Please do not duplicate the applicant name in any future correspondence and use only the CRU reference number

Applicant's request:

I am writing to request the following information relating to Facial Matching Checks conducted by His Majesty's Passport Office on behalf of your force:

- A copy of any policy held by your force governing the use of these checks, or any Data Protection Impact Assessment regarding these checks as used by your force
- A copy of any breakdown for the crime types linked to the searches requested by your force (whatever level this is held at, whether specific offence, offence types, etc) for calendar year 2024
- The number of requests to HMPO for facial matching checks by your force in 2024, and 2025 as of the date of this request

Kind Regards

S.40(2)

Management Assistant

National Police FOI & DP Unit (NPFDU) | National Police Chiefs' Council (NPCC)

S.31(1)



See the [NPCC Data Sharing Hub](#) for guidance, templates & a full list of national agreements


From: [NPCC CRU Mailbox](#)
To: [Freedom of Information \(Cambs\)](#)
Subject: RE: Internal Review Received : CRU ref: 25/4777/Z - Facial matching searches - Including Advice
Date: 27 June 2025 07:43:00
Attachments: [image001.png](#)
[image002.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

Dear S.40(2)

Thank you for referring the below IR to us. This has been logged under CRU reference 4969/B.
Advice will follow in due course.

Kind regards,

S.40(2)

Management Assistant
National Police Freedom of Information and Data Protection Unit
National Police Chiefs' Council
 NPFDU PO Box 481, Fareham, Hampshire. PO14 9FS

S.31(1)



From: Freedom of Information (Cambs)
Sent: 26 June 2025 12:56
To: NPCC CRU Mailbox
Subject: Internal Review Received : CRU ref: 25/4777/Z - Facial matching searches - Including Advice

Good afternoon,

We have now received an Internal Review in relation to the No information held response Cambridgeshire Constabulary provided.

I have made further enquiries with CIB on receipt of the internal review and the response I have received remains the same.

His Internal Review states the following:

Thank you for this response.

I am writing to complain about your force's handling of this request and to request an internal review of the response itself.

Data disclosed by HMPO shows that Cambs Police requested some passport database searches in 2024 so I believe some information may be held and ask that it is please disclosed in review.

I would also like to express my serious concerns about your force's misleading use of a public interest test extension. Earlier you wrote to me to claim an extension of up to 20 working days, arguing that the public interest in relation to an unspecified needed to be considered - however this response says no information is held.

I am concerned about the misuse of the public interest test exemption in this case, as it is clear from the refusal notice that this response did not involve a consideration of the public interest relating to an exemption, and as a result your force has breached it's obligations under Section 10 of the Act, namely to issue a response within 20 working days. It is not appropriate for public authorities to cite an extension under Section 10(3) of the FOIA in order to use the time to consider whether information is held or not.

Please could your force address these concerns about the misuse of Section 10(3), as it is neither in line with the spirit nor the letter of the FOIA to use the extensions to consider whether information is held or not, alongside reviewing the response.

Kind Regards

S

Information Rights Office

Please think about the impact on the environment before printing this email – is it necessary to do so?



From: [NPCC CRU Mailbox](#)
To: [Freedom of Information \(Cams\)](#)
Subject: RE: Internal Review Received : CRU ref: 25/4777/Z - Facial matching searches - Including Advice CRU ref for IR 4969/B
Date: 01 July 2025 16:21:00
Attachments: [image013.png](#)
[image014.png](#)
[image001.jpg](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Afternoon S.40(2)

Hope all is well your side and thanks for sending us the below.

Having had a chance to review the case, I would advise the following:

- Our advice, after extensive engagement with stakeholders, was for Q2+3 forces could confirm OR deny information was held. You've mentioned that Cams responded with a NIH.
 - In response to the applicant challenging your NIH as they appear to have information that suggests otherwise, I can only advice that Cams revisit whether they do hold this or not and see if you can identify any information held, as suggested by the applicant. If after another look you (1) Do find information held, you can respond accordingly and change your response (our advice below) or (2) if you still cannot locate any information held, you can explain the additional research you took to check and uphold your NIH
- In relation to their challenge on the PIT – we provided Wilts with some advice as they are in a similar position to you – they responded NIH but applied an extension to consider the public interest in relation to S31 and have had a similar challenge. The below may help in forming a response on the IR:

The extension for reasons of public interest covers considerations of confirming or denying also. Thus in this case, the extension is applied to consider the public interest in confirming or denying, not just in disclosure.

This is clarified in ICO guidance [here](#), the relevant section stating:

“Under s10(3) you may claim an extension to the statutory working day limit, if necessary. The extension is only for considering the public interest.

Therefore the extension may be claimed if you need more time:

To determine whether or not the balance of the public interest lies in maintaining the exemption

To consider whether or not it would be in the public interest to confirm or deny whether information is held”

- The second part of s10(3) - To consider whether or not it would be in the public interest to confirm or deny whether information is held – is what is useful here for you. I would suggest some wording to the effect of, when you were determining confirmation or denial, you had to also bear in mind the public interest in doing so, especially when taking into account national requests and the mosaic affect. You can appreciate the applicants disappoint and frustration, but you are content that no misuse of the public interest test has occurred etc. then you can use the above to support your input.

Hope that helps? Any questions please don't hesitate to come back to me.

Many thanks



S.40(2)

Head of National Police Freedom of Information and Data Protection Unit

S.31(1)



S.31(1), S.40(2)