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20/08/2025

FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 2378/2025

Thank you for your request for information regarding NPDAB; which has now been considered.

Applicant Question:

I'm seeking copies of the following documents referred to in meeting minutes disclosed in response to my previous FOI request, ref 2272/2025:

1. PDS Data and Analytics Services team Book of Work
2. National guidance to remove barriers when sharing data with retailers
3. National data sharing agreement for immigration enforcement
4. CDAP PID and Roadmap
5. Analytics Landscape Review
6. NPDAB Risk Register

NPCC Response:

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

In wishing to provide context, the minutes of 10 December 2024 (2.2) provided within your response reference 2272/2025 provided by way of action update:

*Action 2 – 2nd October 2024 ****S40(2)**** suggested a full view of the PDS Data and Analytics Services team Book of Work would be useful to the NPDAB, and AS asked SLA be considered as part of this report. ****S40(2)****, ****S40(2)**** and ****S40(2)**** to action SLA requirements.*

- *Response ****S40(2)**** confirmed that the initial conversations have progressed, and a meeting has been scheduled with ****S40(2)**** Head of Delivery from Police Digital Services to discuss this action.*

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Since this was allocated, the representative has left PDS and the Book of Work has been replaced with the agenda item discussed in minutes of 02 April 2025 Item 8.

Colleagues have confirmed that searches have been made through the Board, and the Book of Work was never presented.

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

This information engages S21 Information Reasonably Accessible By Other Means.

In wishing to assist you, the retailer's guidance is published [here](#).

3. The NPCC does hold recorded information captured by your request.

The information is withheld in full by virtue of S22 For Future Publication, S23 Information Supplied By, Or Concerning Certain Security Bodies, S31 Law Enforcement and S40 Personal Information.

Prior to your request, a decision had been made to publish the information however, the publication does omit direct contact addresses, personal data relating to personnel and minor information relating to NCA systems used. For that reason, and for complete transparency, the exemptions above for the minor redactions on the published information are engaged.

In wishing to assist you further, the information is published [here](#).

4. The NPCC does hold recorded information captured by your request.

The minutes of 10 December 2024 @ provided within your response reference 2272/2025 provided by way CDAP update – PID and Roadmap:

CDAP has been superseded by the National Data & Analytics Office Roadmap (NDAO).

This information has been provided to you with minor S31 Law Enforcement and S40 Personal Information redaction.

5. The NPCC does hold recorded information captured by your request.

For completeness, the letter was sent, but the work to capture the information was superseded by work taking place in the AI portfolio (which is still ongoing).

This information has been provided to you with minor S31 Law Enforcement and S40 Personal Information redaction.

6. The NPCC does hold recorded information captured by your request.

This information has been provided in full.

For further information relating to the legislation, please see Annex A.

Yours sincerely

Sherry Traquair
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 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.

The legislation: Section 21 Information reasonably accessible to the applicant by other means

- (1) Information which is reasonably accessible to the applicant otherwise than under section 1 is exempt information.
- (2) For the purposes of subsection (1)—
 - a) information may be reasonably accessible to the applicant even though it is accessible only on payment, and
 - b) information is to be taken to be reasonably accessible to the applicant if it is information which the public authority or any other person is obliged by or under any enactment to communicate (otherwise than by making the information available for inspection) to members of the public on request, whether free of charge or on payment.

S21 is an absolute exemption and there is no requirement to conduct a public interest test.

I am not obliged to provide information for part 1 of your request if the information held is intended for future publication and exempt this information under S22(1)(a) of the Freedom of Information Act.

The legislation: Section 22 Information intended for future publication-

- (1) Information is exempt information if-
 - (a) The information is held by the public authority with a view to its publication, by the authority or any other person, at some future date (whether determined or not),
 - (b) The information was already held with a view to such publication at the time when the request for information was made, and
 - (c) It is reasonable in all the circumstances that the information should be withheld from disclosure until the data referred to in paragraph (a)

Section 22 is a qualified exemption and as such is subject to a public interest test. This means that I have identified the exemption, considered whether the public interest in not disclosing the information outweigh the public interest test in disclosing the information.

In determining the public interest, I have evaluated the impact of releasing the information against the need for public bodies to exercise their functions. In this case, I have concluded that to release the statistics prior to them being published by the Home Office would be irresponsible on the NPCC's part.

The exemption is aimed at preserving intact all existing law providing access to information. The Freedom of Information Act is not designed to subsume other legal access rights or to give alternative routes to access where existing regimes are already available. The Freedom of Information Act access rights build on, but do not replace previous access rights. Those existing rights, and the separate procedural regimes which are tailored to them, continue in place, and the Freedom of Information Act observes corresponding limits to its role.

The legislation: Section 23 Information supplied by, or concerning certain security bodies

(1) Information held by a public authority is exempt information if it was directly or indirectly supplied to the public authority by, or relates to any of the bodies specified in subsection (3)

This is an absolute exemption and there is no requirement to consider the public interest test.

The legislation: Section 31 Law Enforcement

(1) Information which is not exempt information by virtue of section 30 is exempt information if its disclosure under this Act would, or would be likely to, prejudice -

- (a) the prevention or detection of crime
- (b) the apprehension or prosecution of offenders

Disclosure of this information would enable those with criminal intent to target specific areas of the UK to conduct their criminal or terrorist activities. This would also enable criminals to take measures to counteract the tactical capabilities of police forces.

Disclosure of this information would have the likelihood of identifying specific vulnerabilities, which would ultimately compromise police tactics, operations and future prosecutions. Any information identifying the focus of policing activity could be used to the advantage of terrorists or criminal organisations. Information that undermines the operational integrity of these activities will adversely affect public safety and have a negative impact on law enforcement. Public safety would be put at risk if criminals were able to counteract police tactics. The NPCC is committed to demonstrating proportionality and accountability.

Any information that could impact or undermine ongoing investigations or any future investigations would enable targeted individuals / groups to become tactically aware of the police capabilities. This would help subjects and avoid detection, and inhibit the prevention and detection of crime.

The NPCC will not disclose information which may hinder the effective management of law enforcement or place staff or officers at risk. Whilst there is a public interest in the transparency of policing operations and in this case providing assurance that the police service is appropriately and effectively managing this area of policing, there is a very strong public interest in safeguarding the tactical abilities.

The prevention and detection of crime is the foundation upon which policing is built and the police service have a clear responsibility to prevent crime and arrest those responsible for committing crime or those that plan to

commit crime. Disclosure of information captured by this request could directly influence the stages of that process, and jeopardise current investigations or prejudice law enforcement.

Some email addresses are contained within the correspondence and disclosure of direct contact details would enable an individual, intent on committing an offence to make contact with the department, pose as a police officer or member of police staff and try to glean information which would assist in their offending behaviour.

Disclosing information which may place the public at risk, or make it easier for crime to be committed cannot be in the public interest.

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The police service primary performance indicator is the reduction of crime, and disclosure which has a negative impact on that agenda affects public trust in policing and in this case may make it more difficult to police.

With regard to the evidence of harm itself, there is a threshold that requires the predicted issues to be 'more than likely'. In the case of an offender identifying full investigative techniques or gleaning information which would assist in offending behaviour can be difficult to establish and evidence the harm without actually disclosing exempt information. However, the principles are well established in terms of Freedom of Information legislation that to a certain extent the professional opinion of the police must be taken into account.

The legislation: Section 40 Personal Information

(1) Any information to which a request for information relates is exempt information if it constitutes personal data of which the applicant is the data subject.

(2) Any information to which a request for information relates is also exempt information if
(a) it constitutes personal data which does not fall within subsection (1), and
(b) the first, second or third condition below is satisfied.

(3A) The first condition is that the disclosure of the information to a member of the public otherwise than under this Act—

(a) would contravene any of the data protection principles, or

(b) would do so if the exemptions in section 24(1) of the Data Protection Act 2018 (manual unstructured data held by public authorities) were disregarded.

(3B) The second condition is that the disclosure of the information to a member of the public otherwise than under this Act would contravene Article 21 of the GDPR (general processing: right to object to processing).

Any information to which a request for information relates is also exempt information if it constitutes personal data which do not fall within subsection (1), and either the first or the second condition is satisfied.

S40(2) applies to third party personal data. Any release would breach the data protection principles contained within the Data Protection Act 2018. S40(2) has been engaged by virtue of S40(3)(a)(i). Any disclosure of withheld information would breach the first data protection principle of fair and lawful processing.

This is an absolute exemption and there is no requirement to apply the public interest test.