

c/o PO BOX 481

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29/01/2026

**FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 2666/2025**

Thank you for your request for information regarding Prosecuting Agency Status and PNC Input Codes, which has now been considered.

**Applicant Question:**

I am writing to request clarification regarding the use of "Prosecuting Agency" status and organisational codes within the Police National Computer (PNC).

Specifically, I would be grateful if you could confirm:

1. **Definition of "Prosecuting Agency"** – What does this designation mean within the PNC framework, and which organisations are formally recognised under it?
2. **Organisational Codes** – Police forces are identified by numerical codes (e.g. 13 = West Yorkshire Police, 89 = ACRO Criminal Records Office). Could you provide a list of all organisations that have such codes, including non-police bodies, and explain their role in inputting or owning records?
3. **Direct Input Access** – Which organisations, besides police forces, have the ability to input information directly into the PNC? Is there a published list of these organisations and their corresponding codes?
4. **Audit Trail and Operator Identification** – While I understand individual operator IDs are logged internally, is there a way for a defendant or member of the public to access information about *which organisation* keyed in a record, and under what authority?

**NPCC Response:**

The NPCC does hold some information captured by your request.

1. The NPCC does not hold a formal definition of "prosecution agency". However outside of the Freedom of Information Act and as a gesture of goodwill, ACRO provided from knowledge they that would recognise

an agency as a prosecuting one when they are operating under any legislation that empowers them to prosecute offences. The legislation can vary between agencies depending on their work, but they would always be a Competent Authority under the definition of the Data Protection Act 2018 to allow them to process under a Law Enforcement purpose (s31 of the DPA 2018) which includes the purpose of prosecuting criminal offences.

2. The NPCC does have a list of identifying organisational codes. I have provided it by way of attachment to this response letter. Some information has been withheld in full citing Section 23(1) Information Supplied by or Concerning Certain Security Bodies.

In addition the NPCC can neither confirm nor deny that it holds any other information relevant to the request, as the duty to comply with Section 1(1)(a) of the Freedom of Information Act 2000 does not apply by virtue of Section 23(5) – Information Supplied by or Concerning Certain Security Bodies.

In relation to an organisation's role re inputting data, this has been addressed at point three below. If however, this is not what you meant by this question, please come back to us with the specific recorded information that is required.

3. The NPCC can confirm that in relation to direct access, any organisation listed at the attachment provided to you for question 2 has a 2-digit numeric code, then they have potential to update PNC. The current list is not currently published, but has been provided to you at point 2 above.
4. The NPCC does not hold a recorded answer to this question. However outside of the Freedom of Information Act and as a gesture of goodwill, ACRO provided from knowledge that if a member of the public were to make a [Subject Access Request](#) for access to their Police National Computer (PNC) then, the disclosure would indicate the originator of that information as the code and the name of the force/agency would be present on the disclosure.

Yours sincerely

Freedom of Information Officer & Decision Maker

[www.npcc.police.uk](http://www.npcc.police.uk)

## COMPLAINT RIGHTS

### Internal Review

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 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.

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.

### **Legislation - Section 23 Information supplied by, or relating to, bodies dealing with security**

- (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.

In addition the NPCC can neither confirm nor deny that it holds any other information relevant to the request, as the duty to comply with Section 1(1)(a) of the Freedom of Information Act 2000 does not apply by virtue of Section 23(5) – Information Supplied by or Concerning Certain Security Bodies.