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17/03/2026

FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 2754/2026

Thank you for your request for information regarding ACRO Subject Access Requests, which has now been considered.

Applicant Question:

Under the Freedom of Information Act 2000, I request the following information for the five-year period up to 3 February 2026:

1. Total number of Subject Access Requests (SARs) or similar information requests received.
2. Total number of SARs or similar requests acknowledged.
3. Total number of SARs or similar requests fully processed and released.
4. Total number of SARs or similar requests closed, deleted, or not processed on the basis that they “did not meet internal standards.”
5. Total number of complaints received related to these requests, including those regarding timeliness, completeness, or deletion of requests.
6. Copies of any internal policy or guidance used to assess whether a request meets organisational standards for processing.

Additional Request – Internal Procedure & Knowledge:

Please provide copies of any internal procedures, guidance documents, checklists, or staff training materials that govern the assessment of Subject Access Requests (SARs) or related information requests, specifically:

- How a request is determined to “not meet internal standards.”
- Criteria for requesting additional identification or documentation.

- Procedures used to match requests to records on the Police National Computer or other databases.
- Staff knowledge, guidance, or training relied upon in these assessments

This information is requested to fully understand the legal and procedural basis of your responses to DSARs and related requests, and to assess compliance with statutory obligations under the Data Protection Act 2018 / GDPR.

NPCC Response:

ACRO does hold information captured by your request.

1. Please see attached excel spreadsheet which provides the total number of SARs received – Column B.
2. Please see attached excel spreadsheet which provides the total number of SARs acknowledged – Column C.
3. Please see attached excel spreadsheet which provides the total number of SARS fully processed – Column D.
4. Please see attached excel spreadsheet which provides the total number of SARS closed, deleted or not processed – Column E and F (RTA – Returned to Applicant).
5. ACRO does not hold recorded information captured by the specific wording of your request.

ACRO's National Disclosure Unit do not hold centralised list of figures in respect of complaints relating to PNC Subject Access Requests. ACRO are not required to create information in order to provide a response under the FOI legislation.

In wishing to assist you, outside of the Act, ACRO do hold a centralised **concerns log** which relies upon the business area to populate; this details the number of recorded concerns relating to a PNC Subject Access request below, by year as:

2021 – 04
2022 – 03
2023 – 02
2024 – 08
2025 – 08

6. ACRO holds the following:

- PNC Process – This information is a process flow chart and is withheld in fully by virtue of S31 Law Enforcement (*attachment 02 for internal reference*).
- Return to Applicant Process Current 16/01/2026 released with minor S31 Law Enforcement redaction and S43 Commercial Interests redaction. (*attachment 03 for internal reference*).
- Subject access PNC Operator Process withheld in fully by virtue of S31 Law Enforcement (*attachment 05 for internal reference*).
- ACRO SA Training 2025 withheld in full by virtue of S31 Law Enforcement and S43 Commercial Interests (*attachment 06 for internal reference*).

- ACRO Procedure Subject Access V9 released with the following exemptions (*attachment 04 for internal reference*):
 - S31 Law Enforcement
 - S38 Health & Safety
 - S40 Personal Information
 - S43 Commercial Interests

The NPCC cannot release information that relates to IT processes or training of the same, if releasing would be likely to prejudice the prevention or detection of crime, or the security and integrity of systems and any commercial interests of a supplier.

For example, an IT procedure may reveal:

- System architecture
- User access controls
- Vulnerability-management processes
- Security configurations
- Proprietary methods
- Access to supplier-specific configurations
- Information protected under licence or contract
- Methods used to verify identity or detect fraudulent activity as well as assisting someone with intent to:
- Bypass security measures
- Compromising systems
- Gaining unauthorised access to police or ACRO data
- Manipulate or bypass security system processes
- Target specific parts of the system for misuse

Additionally, releasing information relating to system escalation pathways might reveal who has access to sensitive data.

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

Yours sincerely
Freedom of Information Officer & Decision Maker

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.

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.

The legislation: Section 38 Health & Safety

- (1) Information is exempt information if its disclosure under this Act would, or would be likely to—
 - (a) endanger the physical or mental health of any individual, or
 - (b) endanger the safety of any individual.
- (2) The duty to confirm or deny does not arise if, or to the extent that, compliance with section 1(1)(a) would, or would be likely to, have either of the effects mentioned in subsection (1).

S38(1)(a) Health and Safety is engaged to protect the physical or mental health of any living individual; to a request made for a deceased persons criminal record, where disclosure may impact upon their mental wellbeing. The police service is charged with enforcing the law, preventing and detecting crime and protecting the communities we serve. The police service will never divulge information, if to do so may place the health and safety of an individual(s) at risk or undermine the policing purpose in the effective delivery of operational law enforcement.

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.

The legislation: Section S43 Commercial Interests

(2) Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice commercial interests of any person (including the public authority holding it).

The disclosure of the exempt information would provide greater transparency on how the police service spends public money. It would provide greater clarity on the propositions made by the UK police service and what resources will be allocated in order to ensure that the proposals are successfully tendered and completed.

However, relationships would undoubtedly be damaged by the disclosure of the redacted information.

It is important that information is protected which would undermine any such relations as this would not only have an effect on the police service but also any future engagements and proposals the police service may have. The papers concern also the strategic position of the police service in relation to both financial and commercial and operational risk.

Although there is a public interest in understanding how the police service determine whether a service / product is suitable, there is risk of compromise and the trust and confidence between the parties is not in the public interest.

Although there is a public interest and accountability in knowing details of individuals who make decisions on behalf of the police service, the information should not be disclosed where there is a strong possibility that the disclosure would undermine the decision making process.

There is always a public interest in knowing how the police service allocates finances and the disclosure of this information may undermine the tendering process in securing contracts.

Disclosure of the information would have a negative effect on the relationship of the supplier and individual police forces, as well as the NPCC.

Where public funds are being spent, there is a public interest in accountability and justification. In this case, there is an increase in public interest in how Senior Police Officers come together and debate national issues.

S43 protects information which, if disclosed, may adversely affect someone's business interests.

The NPCC feel it would be inappropriate on our part to release any information that may adversely affect the business interests of an individual and reputation.

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.