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04/02/2026

**FREEDOM OF INFORMATION REQUEST REFERENCE NUMBER: 2710/2026**

Thank you for your request for information regarding Chief Constables' Council Minutes, which has now been considered.

**Applicant Question:**

I am writing to request information held relating to the 2025 CCC meetings.

1. I'd like to seek information relating to Pete O'Doherty's presentation on Custody Image Retention, which was part of Session 1 in July 2025. Please provide minutes, handouts, presentation slides, and documents related to this.
2. I'd also like the agenda
3. and ratified minutes from the September 2025 CCC meeting to be disclosed to me.

**NPCC Response:**

1. The NPCC does hold information captured by part one of your request.

The paper submitted to July's Chief Constables' Council, and formed part of the Agenda Item at Session 1 is provided with minor S40(2) Personal Information redaction.

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

2. The NPCC does hold information captured by part two of your request.

The Agenda is provided with minor S31(1) redaction.

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

3. The NPCC does hold information captured by part three of your request.

The minutes are provided with redaction and by virtue of the following exemptions:

S23 Information supplied by, or relating to security bodies  
S24 National Security  
S31 Law Enforcement  
S38 Health & Safety  
S40 Personal Information

For further information, please see Annex A.

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.

### **The legislation: Section 23 Information supplied by, or relating to 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 24 International Security – the legislation:**

(1) Information which does not fall within section 23(1) is exempt information if exemption from section 1(1)(b) is required for the purpose of safeguarding national security.

Information will not be released if the information, where if to do so, would result in the information potentially being used to help one or more individuals circumvent for criminal and/or other reasons including those that would put at risk national security.

The information would allow individuals to infer the level of ability police forces maintain in regards to safeguarding national security. There is a significant risk that knowledge and understanding of any capabilities that the police have would allow terrorists or individuals to undermine or circumvent the police thereby prejudicing the ability to maintain national security.

**Any disclosure under FOI is a disclosure to the world at large.** Release of the information would limit operational capabilities as criminals / terrorists would gain a greater understanding of the police's methods and techniques, enabling them to take steps to counter them; and provide an indication to any individual who may be undertaking criminal / terrorist activities that the police service may be aware of their presence and taking counter terrorist measures.

It is understood that the public are entitled to know where their public funds are being spent and a better informed public can take steps to protect themselves.

Confirming the use of techniques, capabilities, methodology and resources could render security measures less effective. This could lead to the compromise of ongoing or future operations to protect the security or infrastructure of the UK and increase the risk of harm to the public.

### **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.