



Response Date: 18/06/2024

2024/533 - Cost of policing royal visits

In response to your recent request for information;

1. What was the total cost to North Wales Police of policing the visit by King Charles and the Queen Consort to Wrexham on December 9, 2022? Please provide a breakdown of the costs if possible.

2. What was the total cost to North Wales Police of policing the visit by Prince William to Wrexham on March 1, 2024? Please provide a breakdown of the costs if possible.

We can confirm that information is held in relation to part one of your request however concerns have been raised in relation to disclosing the requested information, therefore a Public Interest Test has been carried out;

Section 17(1) of the Freedom of Information Act 2000 requires North Wales Police, when refusing to provide such information (because the information is exempt) to provide you the applicant with a notice which:

- (a) states that fact,
- (b) specifies the exemption in question and
- (c) states (if not otherwise apparent) why the exemption applies.

The exemption/s, as well as the factors considered when deciding where the public interest lies, are listed below:

Section 24(1) National Security
Section 31(1)(a) Law Enforcement
Section 38(1)(b) Health and Safety

All the sections listed above are prejudice based qualified exemptions and any prejudice (harm) that is held would cause must be articulated as well as the public interest considerations

Therefore, a Public Interest Test has been carried out to weigh up the reasons for and against disclosure of the information requested, to ensure the release is in the interest of the public as a whole and not just the applicant.

Harm

The release of information requested by the applicant would result in harm to the national security of the United Kingdom. Releasing costs associated with the protection of the King would provide those intent on committing acts of terrorism with valuable information as to the level of resistance they might expect to counter when undertaking such an act. Someone could reasonably infer comparable protection levels with other public figures whose receipt of protection is a matter of public record, namely the Prime Minister. The costs of these protections remain undisclosed for the same reasons of national security, health and safety and law enforcement. Disclosing the information sought would also give valuable tactical information to those who seek to harm such figures.

The release of information which might assist a potential terrorist in planning an attack on a Member of the Royal Family, including the possibility of identifying protection surrounding the Head of State, would threaten the prime institution of the United Kingdom's constitutional arrangements, and thus the nation's security.

Furthermore, there is evidence that those planning terrorist attacks have made use of a wide range of sources when gathering information on their targets, including press reports, which were combined with physical reconnaissance to build a picture of an individual's protection level. To reveal information showing levels of protection to those intent in causing harm would increase the risk of harm to those individuals.

It follows that any heightened risk to individuals in receipt of protective security arrangements represents a similar risk to a member of any organisation (e.g. the police) providing that protection. Any physical attack on any person, regardless of whether they are a Member of the Royal Family or not, is a crime and therefore where release would harm their safety (of that of any other person) section 31(1)(a) is engaged.

Public Interest Test s24, s31 and s38 overall

Factors favouring disclosure - Where information relates to how the King fulfils his roles and functions there is an interest in disclosure. In this case, publication of the overall cost of providing protection would hold authorities to account for the level of protection afforded to the Head of State and show that the deployment of officers is appropriate and proportionate. It would also encourage more informed debate about national security issues. It would also serve an important public interest in demonstrating accountability and furthering public understanding in relation to the costs incurred in providing protection for the Head of State.

Factors favouring non-disclosure - Any disclosure of information that would allow extremists to gauge the level of protection afforded to the King would provide anyone intent on committing acts of terrorism with vital intelligence as to the level of police resistance that they may encounter. This would hinder the ability of law enforcement bodies to protect the King and would clearly not be in the public interest. One might also be able to work out if there are likely to be occasions when that individual is subject to lower levels of protection and thus in a position of increased vulnerability. Likewise, by disclosing the overall cost for security of the King there is the strong possibility that if costs varied between the King and other individuals, then this would increase the risk of targeting one of them.

All UK police forces have a duty to fulfil their national security functions and protect the safety of any and all individuals. The disclosure of this information would increase the risk to the safety of the King as well as the general public. The personal safety of the Head of State is inextricably linked to national security and any attacks on these individuals would be an attack on the King would be an attack on the sovereignty of the United Kingdom and its constitutional arrangements.

There is no public interest in disclosing information that would increase the risk to public safety.

Balancing Test

After weighing up the competing interests I confirm that the disclosure of the above information would not be in the public interest. We consider that the benefit that would result from the information being disclosed does not outweigh the harm arising from disclosing information relating to the overall cost of providing protection to the Head of State.

In relation to part 2 of your request regarding information relating to the Queen Consort and Prince William North Wales Police can neither confirm nor deny that it holds any other information relevant to this request by virtue of the following exemptions.

- Section 24(2) National Security
- Section 31(3) Law Enforcement
- Section 38(2) Health & Safety
- Section 40(5) Personal Information

Section 40 is a class based absolute exemption. When applying this exemption, it is necessary to articulate which Principle of the General Data Protection Regulation Act 2018 (GDPR) would be breached by confirming whether information is or isn't held. In this case, it would be the first principle that is breached in as much as personal information shall be processed lawfully, fairly and in a transparent manner in relation to identifiable individuals.

Sections 24, 31 and 38 require the application of a prejudice test and public interest test which are evidenced below.

Harm

FOIA responses are considered to be a release to the world. Whilst not questioning the motives of the applicant it could be of use to those who seek to cause harm to any person who may or may not be in receipt of protection or security for whatever reason. To confirm or deny that North Wales Police is or is not protecting or has afforded security to certain individuals would enable those who sought to threaten the safety of such individuals to calculate who was most at risk and whom was in receipt of some type of protection.

The effect of this information being available to the applicant, and more importantly those who might wish to cause harm to certain individuals, and these could include terrorists, criminals, and fixated individuals, would be detrimental to those who are a target of a potential crime.

To ensure that those in receipt of protection/security are not subject to additional threat as a result of disclosure, and to ensure the safety of the members of the public attending events, where persons who may or may not be in receipt of protection are present, would require a review and likely an increase in the number of protection officers employed and a full review of protection arrangements. This would increase the costs to the public purse.

To confirm or deny whether information is held for specific individual(s) could be used over a period of years to try and work out how resources are allocated. This could be then used to gain an understanding of how much security and the number of officers allocated to those who may or may not be receiving protection.

Those with the necessary criminal intent, inclination and capacity could use the information (especially if provided over a period of years) to begin to try and map costs for protection across forces. This would then provide them with an operational advantage over North Wales Police and other forces as the information can indeed be viewed as operational 'intelligence' and operationally sensitive.

To confirm or deny that protection or security is or has been afforded to any other individual, other than those which have been publicly stated by North Wales Police, would have a negative effect on the safety of those being protected, should the release of information be used and manipulated to try and attack the protected individuals and establishments, for example through mapping protection across forces.

To confirm or deny that this protection exists may lead to an attack on establishments within locations where one force is seen to incur lower costs per year on protection, as these locations may be viewed as a 'weak/vulnerable target' with less policing resources allocated to protection duties. Such an occurrence would harm individuals as well as result in the allocation of additional policing resources due to a FOIA disclosure.

It remains the case that the publication of any information relating to an individual who might or might not receive protection/security could potentially lead to harm to that individual, particularly if that information relates to the security arrangements for that individual or formed any part of a protection package that might or might not be provided. Disclosure of these figures damages the need to ensure protection arrangements remain covert, purely in the interests of operational sensitivity.

It is important to note that the UK does face a serious and sustained threat from violent extremists and this threat is greater in scale and ambition than any of the terrorist threats in the past.

Government reports suggest that at any one time the police and security agencies are contending with many terrorist plots, terrorist groups or networks and individuals who are judged to pose a threat to the well-being of the UK and or UK interests. While the plots may not necessarily all be directed at attacks on the protected individuals, North Wales Police must bear in mind that an attack on members of the Royal Family or other prominent individuals would be of national significance to our country. To provide a cost figure regarding security arrangements for protected establishments and individuals is likely to place them at serious risk due to their prominence across the globe.

As previously explained above, in this current environment of an increased threat of terrorist activity, confirming or denying that information is held that could assist an extremist faction would undermine the safeguarding of national security.

The emphasis in the ICO guidance is that there is no definition of national security and refers to the Information Tribunal (EA/2006/0045) who summarised:

- "National security" means the security of the United Kingdom and its people;
- The interests of national security are not limited to actions by an individual which are targeted at the UK, its system of government or its people;
- The protection of democracy and the legal and constitutional systems of the state are part of national security as well as military defence;
- Action against a foreign state may be capable indirectly of affecting the security of the UK;
- Reciprocal co-operation between the UK and other states in combating international terrorism is capable of promoting the United Kingdom's national security.

The ICO guidance also states 'safeguarding national security also includes protecting potential targets even if there is no evidence that an attack is imminent...the Commissioner also recognises terrorist can be highly motivated and may go to great lengths to gather intelligence. This means there may be grounds for withholding what seems harmless information on the basis that it may assist terrorists when pieced together with other information they may obtain.'

Based on this definition national security encompasses a wide spectrum and it is our duty to protect the people within the UK. Public safety is of paramount importance to the policing purpose and must be considered in deciding whether to disclose any requested information.

Public Interest Test

Section 24 - Factors favouring confirmation or denial - The information simply relates to national security and disclosure would not actually harm it. Confirming or denying that the information is held would allow individuals to contribute to more accurate public debate on matters that are of public relevance - in this case information pertinent to protection and the use of public funds.

Section 24 - Factors against confirmation or denial - By confirming or denying any policing arrangements, which refer to the personal protection or security arrangements of specific individuals, would render security measures less effective. Personal protection is provided by North Wales Police where it is in the national interest or where intelligence suggests protection is necessary.

Specific protection arrangements are applied to safeguard national security by ensuring that appropriate safety and security is provided to the King and the Prime Minister. The disclosure of any other information would ultimately increase the risk of harm to those other persons who may or may not be afforded personal protection and to the public within that vicinity.

Persons/groups would be able to ascertain which individuals North Wales Police considers to be currently at most risk of harm, and therefore which threats or campaigns to undermine UK security the police believe to be most pertinent.

Section 31 - Factors favouring confirmation or denial – Confirming or denying whether information is held in relation to protection would allow the public to see where public funds are being spent. Better public awareness may assist to reduce crime or lead to more information from the public.

Section 31 - Factors against confirmation or denial – Confirming or denying that any information is held in relation to the security or protection of individuals would lead to law enforcement tactics being compromised which would ultimately hinder the prevention and detection of crime. Security arrangements and tactics are re-used and have been monitored by criminal groups, fixated individuals, and terrorists. Protection is provided in many forms after careful evaluation of the threat and risks posed to those individuals by operational experts in this field of policing. It therefore follows that anything that would negate the benefits of that protection would place individuals at risk. This would be the individuals receiving protection, the police officers providing the protection and any member of the public in the vicinity of the principal.

To confirm or deny that an individual(s) is in receipt of protection or security would allow anyone to review their activities and thus ultimately calculate how many officers had been assigned to protect that individual. This would then again place the individual and officers at risk if they were targeted by criminals/terrorists.

Section 38 - Factors favouring confirmation or denial – The public are entitled to know what areas of activity the police service allocates public funds to and therefore by confirming or denying the provision of protection or security, would lead to better informed public awareness and debate. Confirmation or denial would assist communities to be more aware of the level of protection afforded to them.

Section 38 - Factors against confirmation or denial – Confirming or denying that information is held in relation to the protection or security of any individual would have the effect of increasing the threat to those individuals who are in receipt of protection and in addition to those who do not receive protection and might therefore appear to be soft targets. The risks to individuals are significant as evidenced and there would be a loss of confidence in the Police Service to protect the well-being of the community. Furthermore, if an individual/group decides to counter the protection arrangements and target an individual, members of the public within the vicinity could be exposed to either physical or psychological harm.

Balance Test

The security of the country is of paramount importance and the Police Service will not divulge whether information is or is not held if to do so would place the safety of an individual at risk or undermine National Security. Whilst there is a public interest in the transparency of policing operations and providing assurance that the police service is appropriately and effectively engaging with the threat posed by a potential attack on a VIP, there is a very strong public interest in safeguarding both national security and the integrity of police operations in the highly sensitive area of personal protection.

The public interest is defined not as what the public might find interesting but there must be some tangible benefit to the public in the disclosure of the interest. In this case whether the outcome of request is confirmation or denial of who is in receipt of protection, the net result of publishing that information would be that a review would need to be conducted, plans changed to ensure that the threat level was effectively challenged and development of a new protection plan that would in all likelihood require additional resources to be provided and probably the extension of protection to those who had not been in receipt of it before the release of the requested information.

After weighing up the competing interests I have determined that to confirm or deny that we hold the requested information would not be in the public interest. North Wales Police considers that the benefit that would result from the information being disclosed, does not outweigh the harm arising from disclosing information relating to who is provided with protection.

Therefore, in accordance with the Freedom of Information Act 2000, this letter acts as a Refusal Notice under section 17 (1) of the legislation.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 14/06/2024