



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

Response Date:13/11/2025

2025/1170 - Advice/correspondence

In response to your recent request for information regarding;

Please now inform me of the following:

- 1. Whether the CRU advised you to respond to the above request. If so, please provide me with a copy of the full correspondence relating to that request. That includes emails sent by your force to the CRU and from the CRU to your force in relation to the above request.**
- 2. If the CRU did not provide you with advice, but you built your response to the above request based on the following extract, please clarify where you got that extract.**

Clarification

To be clear, in my first question, I meant whether the CRU advised you ON HOW to respond to the above request. Hence, the updated request is:

I previously contacted your force with the below request:

"I am writing to request all written digital correspondence between (1) your force's team responsible for addressing and responding to freedom of information requests and (2) the National Police Chiefs' Council's (NPCC) central referral unit (CRU) in September 2025.

I appreciate that parts of the correspondence will need to be redacted, but would remind that redaction does not count towards the time/cost limits under s12 of the FOIA. The possibility that parts of the correspondence will need to be redacted also does not justify withholding the correspondence in its entirety."

Please now inform me of the following:

- 1. Whether the CRU advised you on how to respond to the above request. If so, please provide me with a copy of the full correspondence relating to that request. That includes emails sent by your force to the CRU and from the CRU to your force in relation to the above request.**

Please find attached.

Names have been removed as to disclose them would be a breach of the Data Protection Act, these are exempt under Section 40 (2) of the Freedom of Information Act. Therefore, in accordance with the Freedom of Information Act 2000, this letter acts as a Refusal Notice under section 17 (1) of the legislation.

Pencadlys yr Heddlu,
Glan-y-Don, Bae Colwyn LL29 8AW
www.heddlugogleddcymru.police.uk

Police Headquarters,
Glan-y-Don, Colwyn Bay LL29 8AW
www.northwales.police.uk

**Yn gwneud Gogledd Cymru'r lle mwyaf diogel i fyw, gweithio ac ymweld yn y DU
Making North Wales the safest place to live, work and visit in the UK**

Concerns have been raised in providing the email address of the National Police Chiefs' Council's (NPCC) central referral unit email address and information which relate to security bodies. A Freedom of Information Act request is not a private transaction. Both the request itself, and any information disclosed, are considered suitable for open publication. This is because, under Freedom of Information, any information disclosed is released into the wider public domain, effectively to the world and not just to one individual.

Therefore, Section 31 (1) Law Enforcement and Section 23 (1) Security Bodies is to be considered as part of the Public Interest Test. 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.

Section s31(1) Law Enforcement

Section 23 (1) Information Supplied by , or concerning certain security bodies

Section 31 (1) is a prejudice based qualified exemption, therefore there is a requirement to articulate the harm that would be caused in confirming or not that the information is held as well as carrying out a public interest test.

Section 23 (1) is an absolute exemption, therefore there is no requirement to conduct a public interest test.

The Harm Test process requires North Wales Police to consider any possible harm that might arise as a result of placing the requested information into the public domain. This process considers the potential harm to:

- Individuals
- The community as a whole
- North Wales Police and the wider policing service
- Other bodies

Harm in respect of s31(1) Law Enforcement

North Wales Police are charged with enforcing the law, preventing and detecting crime and protecting the communities we serve.

While we appreciate you will have no ill meaning behind your request, disclosure of the National Police Chiefs' Council's (NPCC) central referral unit email address could result in it being used by those with criminal intent to undermine policing efforts. If the mailbox was bombarded with email this could result in emails from Forces getting missed and advice not being provided, potentially relating to national issues where we have to respond the same to ensure the safety of the public.

Public Interest Test:

Factors favouring Disclosure – the whole purpose of the Freedom of Information Act is to ensure transparency therefore providing the email address would show where we contact for advice.

Factors favouring Non-Disclosure – providing the email address into the public domain could result in the CRU becoming less effective due to additional unnecessary emails being received or used by those with the necessary criminal intent

Balance Test

The strongest reason favouring disclosure is increasing public knowledge of where we receive advice from and North Wales Police being open and transparent.

The strongest reason favouring non-disclosure is to not undermine the work of the CRU by virtue of an adverse FOIA disclosure.

On weighing up the competing interests I have determined that the disclosure of the above information would not be in the public interest. I consider that the benefit that would result from the information being disclosed does not outweigh the considerations favouring non-disclosure. A generic name can be provided therefore it is obvious where the email is from however the exact email address would not be in the public interest.

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

2. If the CRU did not provide you with advice, but you built your response to the above request based on the following extract, please clarify where you got that extract.

Extract:

"Our force FOI teams contact the NPCC Central Referral Unit (CRU) for a wide variety of reasons in the course of their work. In aiming to ensure we provide the most accurate response to your request, please can you confirm whether you seek digital correspondence to and from the CRU in relation only to FOI requests the force FOI team have referred to the CRU, or if you are requesting every piece of digital correspondence between the force and the CRU, including wider emails?"

North Wales Police have never used the above extract.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 10/11/2025

From: NPCC CRU Mailbox <[REDACTED]>

Sent: 15 October 2025 14:35

Subject: CRU reference: 01/CRF/25/005394/S - Correspondence between your force and the NPCC CRU - Request logged - Advice to Follow

Dear All,

The below FOI request has now been logged in the CRU and will be treated as a national request. **Advice will be sent to all forces in due course.**

Please note we do not require confirmation that it has been received by your force.

Our reference: 01/CRF/25/005394/S

Referred by: Bedfordshire Police, Cambridgeshire Constabulary, Cleveland Police,
Derbyshire Constabulary

Sent from: [REDACTED]

The Applicant name is included in the acknowledgement email as a reference for forces only, any future correspondence will only quote the CRU reference number. Please do not duplicate the applicant name in any future correspondence and use only the CRU reference number.

Applicant's request:

I am writing to request all written digital correspondence between (1) your force's team responsible for addressing and responding to freedom of information requests and (2) the National Police Chiefs' Council's (NPCC) central referral unit (CRU) in September 2025.

I appreciate that parts of the correspondence will need to be redacted, but would remind that redaction does not count towards the time/cost limits under s12 of the FOIA. The possibility that parts of the correspondence will need to be redacted also does not justify withholding the correspondence in its entirety.

Clarification Requested from Cambs:

Can you please confirm if you are requesting copies of correspondence between the FOI Team and the NPCC CRU in relation to FOI requests received by Bedfordshire Police between the 1st September to 30th September 2025 as this is unclear

Clarification Received from Cambs:

Yes, that is what I am requesting.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



From: NPCC CRU Mailbox [REDACTED] >

Sent: 20 October 2025 09:55

Subject: OS - 25/5394 - Request for correspondence with NPFDU

OFFICIAL – SENSITIVE

POLICE EYES ONLY

Not to be distributed outside of the Police network or other agencies without prior authorisation from the CRU

Dear All,

Please see the below request which we believe is doing the rounds. Our thoughts are included below:

Our reference: 01/CRF/25/005394/S

Referred by: National

Applicant's request

I am writing to request all written digital correspondence between (1) your force's team responsible for addressing and responding to freedom of information requests and (2) the National Police Chiefs' Council's (NPCC) central referral unit (CRU) in September 2025.

I appreciate that parts of the correspondence will need to be redacted but would remind that redaction does not count towards the time/cost limits under s12 of the FOIA. The possibility that parts of the correspondence will need to be redacted also does not justify withholding the correspondence in its entirety.

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Clarification Received from Cambs:

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CRU Advice

As always, Cost is the first consideration. But apologies, we do not have the capacity to determine from our end what correspondence has gone to and from each force.

If Cost is not relevant to your force, please review the information held on the following points:

S40(2) redactions for names, including NPFDU staff and the applicants of any FOI request correspondence. Also any personal emails and mobile phone numbers.

S31(1) in respect of the CRU mailbox.

S23(1) where information is in relation to a security body.

I have attached an example referral form with areas highlighted in yellow which would require redactions using the exemptions mentioned.

Lastly, unless practitioners need specific advice, there is no immediate requirement to send draft responses and the material with redactions proposed. But if you are not sure, please contact us.

Kind regard,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



In order for the NPFDU CRU to deliver its remit, forces and partners must refer certain requests centrally.

In addition to these mandatory referrals, any FOI/EIR request can be sent that requires specific disclosure and/or technical advice. To do so a completed referral form needs to be sent by e-mail to [REDACTED]
Please note incomplete forms may have to be returned.

Advice on the referral process or a simple FOI/EIR technical query can also be made by via MS Teams or by telephoning the team on [REDACTED], however, due to hybrid working this is not always manned.

Once a FOI referral has been received in the NPFDU CRU, we will generate an e-mail which will confirm its URN. This message may also contain further instructions which must be complied with before further guidance can be issued.

Any request referred must **not** be answered until a final response has been received from the NPFDU CRU. **If your force is considering making a disclosure prior to advice being issued or if it does not intend to follow national guidance, please make contact as soon as possible.**

Mandatory Referrals-By Subject Area	
Subject	Notes
Witness protection/protected persons. Requests which name and/or relate to information which MAY originate from any of the S23 bodies.	Ultra high risk subject area which must be referred to CRU. [REDACTED]
Covert operations, use of informants or surveillance activities or tactics.	Ultra high risk subject area which must be referred to CRU.
Counter terrorism (incl Prevent, Pursue, Protect, Prepare) and/or national security material or operations.	Includes SB, CTU, CBRN, port or airport operations, Crowded Spaces and ANPR.
VIP/Royalty Protection.	To include high profile Royal events and visits.
Information received from or which relates to certain partner agencies. *	Includes NPCC, any government department, IOPC, CPS and College of Policing.
Major or complex incidents or investigations or operations. *	Examples such as extremist protests, large scale public disorder, multiple or high profile unexplained deaths, cross border incidents. Will also include national operations and Inquiries.
International Relations	Includes international training, visiting overseas dignitaries & FCO equities where s27 may be engaged.
National Security	Requests requiring s24 will need stakeholder consideration
Notification of ICO complaint, First Tier Tribunal or Upper Tribunal activity	
Requests with potentially significant reputational implications, e.g. the storage of human tissue.	Where policing leads would welcome the opportunity to comment (if unsure please contact the CRU)
Requests for deceased persons criminal records/PNC record	Includes prolific/notorious deceased offenders as well as famous/non-famous deceased individuals.
Requests for information held for the purpose of a statutory Inquiry under the Inquiries Act 2005	Examples – UCPI, Manchester Arena, Death of Dawn Sturgess, Grenfell

*If a request is captured by previous NPFDU guidance within the past 12 months, then no referral is required.

Temporary Mandatory Referrals	
Subject	Date added
Polygraph	09/06/23
[REDACTED]	[REDACTED]
Op Tarlac	16/11/23

*There is no requirement to refer if the information requested is already officially published 'Officially published' includes, MAPPA reports and websites such as OSC, The College of Policing, NPCC, Government, IOPC, PCC, Police.UK or Force websites, or documents already marked as suitable for publication under FOIA 2000.

****PLEASE COMPLETE ALL THE BELOW FIELDS TO ENSURE ACCURATE & TIMELY ADVICE****

Force reference number:	616/24
Date request received:	02/02/2024
Type of request:	Initial
All known applicant details:	[REDACTED] request-1080078- db2fcec8@whatdotheyknow.com
Actual wording of request	In answer to a question from [REDACTED] concerning facial recognition, [REDACTED] said: 'Where it has not been possible to identify a suspect on PND, forces can submit requests to the Home Office for checks against the passport and immigration databases.' UIN 11044, tabled on 23 January 2024 https://questions-statements.parliament.uk/written-questions/detail/2024-01-23/11044 Please provide the number of requests you made to the Home Office for checks against the passport and immigration databases in the year 2022/23.
Person dealing with request and contact number:	[REDACTED]
Reason for referral:	Request concerning requests for facial recognition checks via HO databases.
Do you know what information you hold? Please provide as much detail as possible.	Not at this time.
If a technical query and/or request for disclosure advice specifically what is the issue: (For S14 queries please enter as much detail as possible)	Consideration of full NCND via Section 23(5) Information supplied by, or concerning, certain Security Bodies Section 24(2) National Security Section 31(3) Law Enforcement

	As this has been utilised with previous facial recognition based requests ??
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