



Response Date:13/05/2025

2025/384 - Information Sharing Agreements

In response to your recent request for information regarding;

BACKGROUND

I am seeking information regarding the sharing of individuals' personal data by universities/university accommodation providers with the police in connection with protest activity, including (but not limited to) verbal or written statements, flyering, picketing, waving of banners, and encampments.

Please take a broad interpretation of protest activity, including where an individual could be said to fall under the scope of this request because of what the police or the university has considered to be wider misconduct/criminality related to their activism, such as criminal damage, rather than specifically their involvement in activism.

QUESTIONS

(1) Copies of any and all Information Sharing Agreements between your force and universities or university accommodation providers within your police force area.

(2) If retrievable within the cost limit, the number of individuals whose personal data your force has requested and/or received from a UK university or university accommodation provider since 1 October 2023 under the terms of the ISAs disclosed in response to question 1.

(3) If retrievable within the cost limit, please break this down the figures disclosed in response to Q2 by:

A. The name of university or accommodation provider (eg Unite) the data was requested/received from B. The outcome of the data request, if police made one (eg provided / refused) C. The reason for sharing data, including, whether it was in connection with any protest activity the data subject was involved in (if so, please specify the type of cause eg Pro-Palestinian, Environmental, Animal Rights)

In relation to the first sentence in connection with protest activity, we don't hold any Information Sharing Agreements with universities or university providers.

(4) Copies of any and all Community Impact Assessments (CIAs) conducted in relation to the policing of pro-Palestinian protests events in your police force area since 1 October 2023, as well as any overarching CIAs.*

Please find attached.

Harm has been identified in providing you with some of the content within the document;

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) (a) Law Enforcement 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 31 (1) (a) Considerations

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 could be used by those with criminal intent against the North Wales Police or the UK as intelligence against North Wales Police resources, knowledge at a given point in time and law enforcement tactics to undermine policing efforts. It is not in the public interest to disclose information that could be used to assist in the planning of criminal activity or hinder our relationship with groups of the communities we serve, due to an adverse FOIA disclosure.

Section 31 factors in favour of disclosure

The use of police resources and tactics is a matter that the force should hold up to public scrutiny as the police are accountable for public funds and public safety; therefore there is a public interest in justification of the spending of these funds and how the public are kept safe.

Section 31 factors in favour of non-disclosure

Disclosure would lead to a loss of confidence in the North Wales Police and UK ability to protect the safety of the community (for example, following an adverse FOIA disclosure regarding resources, tactics or local intelligence).

The risk to individuals and the community is likely to be significant if the information is used by those with the necessary criminal intent to undermine the very purpose information is held (crime prevention and detection at a national scale).

Extra security measures and policing resources may need to be put into place with the disclosure of this information. This is because of the risk disclosure brings in that it could be used as intelligence by those with the necessary criminal intent to undermine policing in different parts of the UK based on the content of the full minutes.

Additionally, disclosure of some information could hinder the relationship we have with the different parties involved.

Balance Test

The strongest reason favouring disclosure is increasing public knowledge of a policing conversation and North Wales Police being open and transparent.

The strongest reason favouring non-disclosure is to not undermine law enforcement tactics, methodology and resources 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.

I appreciate this is not the decision you would have liked for this part of your request. However this decision has been made on the understanding that the public interest is not what interests the public but is what would be of greater interest to the public as a whole, should the information be disclosed.

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

We have disclosed as much information as possible and only exempted small sections of the information which is considered harmful if disclosed.

(5) Copies of any and all Equality Impact Assessments conducted in relation to the policing of pro-Palestinian protests in your police force area since 1 October 2023, as well as any overarching EIAs.*

No information held in relation to your request.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 10/04/2025

Community Impact Assessment

S.I.O (if applicable)
Occurrence Number
...
Date from:
21/05/24
Date to:
Unknown

- A Community Impact Assessment (C.I.A.) should be prepared when an incident occurs (or in preparation to a pre-planned policing activity) where the effectiveness of the police response to the incident or the activity itself is likely to have a significant impact upon the community.
- The impact of such an incident may be on a small number of persons, minority / vulnerable groups or on the wider community.
- These assessments are a tool to assess the level of community tension before, during or after an incident (they are not a threat assessment).
- CIA's are a living document and tension levels may diminish or escalate on a regular basis.
- All C.I.A should be reviewed at least every 24 hours.
- A C.I.A. should record the identified threat / risk to community tension and the actions required to mitigate them.

Community Impact Assessment

SECTION A Information Received – Analysis

What is the nature of the incident/operation/event?

Set the scene – relevant info/incident summary

On the 8th of May 2024 students from Bangor university erected a protest encampment on the lawn in front of the Pontio building, Deiniol road, Bangor. The encampment encompasses a group of people (mainly students) demonstrating against the conflict in Israel and Gaza. The encampment is pro-Palestinian with protesters displaying banners stating, 'STOP GENOCIDE -FREE PALESTINE' and 'END THE SEIGE OF GAZA.'

The protest site in Bangor, Gwynedd consists of approximately 10 tents and a small collection of banners and flags (Palestinian and Welsh flags). The protestors are largely made up of students from Bangor university who take turns on the encampment to ensure the protest continues 24/7. To date their protest activities have been peaceful and low key, ranging from sporadic marches through the city displaying banners and chanting statements such as 'free Palestine' to simply sitting at their encampment spreading their message to passing members of the public. The protestors are campaigning for the university to end a contract (divestment) with Siemens. Protestors believe Siemens have invested in Israel who have been accused of war crimes in Gaza. They support the Palestinian BDS National Committee (BNC), the largest coalition in Palestinian society that is leading the global Boycott, Divestment and Sanctions movement.

Indications suggest the encampment will remain in situ until such time the university agree their divestment demands.

Location of incident/operation/event

Street Address/Divisional Beat Code etc

Western division
Outside Pontio,
Deniol Road,
BANGOR,
LL57 2TQ

Which community groups/individuals are most likely to be affected by the incident/operation/event?

Give an overview of the community or communities that live at or near to the location. Also consider groups that work or frequent the area

Local Policing Service officers:

Officers must remain impartial. We have duty to facilitate peaceful protest but cannot be seen to support protest activity/ cause. Policing plan in relation to the protest is vital to maintain organisational legitimacy and support officers who will have to engage with members of the protest group.

Bangor university staff and students:

The encampment is situated in a prominent location but does not currently cause any disruption to the university operations.

Jewish community - largely university students:

Protestors taking a stand against investment with companies linked with Israel. There is a risk of confrontation between Jewish students and the protestors.

Deiniol road users:

The encampment is situated on university land but within close proximity to the main road through the city of Bangor, potential for disruption should the encampment develop.

Protestors:

The protestors themselves are at risk due to the location of the encampment - next to a busy road, main thoroughfare for drunken persons waling between public houses. Protestors have already been victim to ASB and criminal behaviour.

Community Impact Assessment

Are there any diversity issues that need considering? If so, what are they?

Consider if any minority groups will be affected by this – including but not exclusively Age, Disability, Gender, LGB & T, Race and Religion. There may be no factors for concern.

There are clear race and religion issue with this protest activity.

Whilst the protest is about divestment and against the war in Gaza rather than Israel itself, there is clear risk for offence to persons from Israel (specifically the Jewish community within the university). This could lead to counter protest and conflict between those in support of Palestine and those in support of Israel.

Detail any historical tension between the affected groups/individuals

Consider previous incidents/tensions between groups or individuals that have led to this situation. Also, tensions towards Police/previous Police activity that has raised tension.

Further afield this has stemmed from the on going war taking place with palastine.

Community Impact Assessment

SECTION B

<u>External Consultation Checklist</u>			
Tick Box		Name(s) and Contact Details	Date and Time
☐	Faith Leaders	...	
☐	Head Teachers		
☐	IAG		
☒	Local Councillor	...	22/05/2024
☒	Local MP	...	21/05/24
☐	NCTT		
☒	Parish Council	...	
☐	Partner Agencies	...	29/05/2024
☒	Residents groups	...	04/06/2024
☐	Youth Groups		
☐	Other: Specify		
Findings / Advice			

<u>Internal Consultation Checklist</u>			
Tick Box		Name(s) and Contact Details	Date and Time
☐	ACPO (if applicable)		
☐	H.Q. Diversity Unit		
☐	Community Safety Team		
☐	Divisional Diversity Unit		
☐	Divisional Command		
☐	FLO		
☐	Intelligence Unit	...	28/05/2024
☐	Press Office	...	

Community Impact Assessment

☐	Senior Investigating Officer	N/A	
☐	Other dept: <i>specify</i>		
Findings / Advice			

Community Impact Assessment

Tension Guidance

CURRENT EVENTS

Current event matrix is to be used where an event or incident is live at the time of C.I.A. completion.

HIGH -IMMINENT	Corroborated evidence of preparation for crime and disorder. Tension indicators indicating crime and/or disorder to be expected within hours . EG <i>Persons gathering outside witness location, weapons being prepared. Stockpiles of weapons discovered, opposing groups planning to demonstrate or fight.</i> Community and/or criminal intelligence suggests disorder is likely to develop within hours .
HIGH	Substantial evidence of fear of crime and/or disorder along with evidence of preparations to deal with the consequences. EG <i>Shops being boarded up.</i> Levels of crime and/or disorder raised along with evidence of serious offences having been committed. Tension indicators showing sustained hostility between particular groups/individuals or towards police. There may be evidence of activity by extremists groups. Disorder may have happened in the recent past. Community and /or criminal intelligence suggests disorder or crime likely to develop within days .
MEDIUM - HIGH	Evidence of alarm at current tension levels. Local media reporting that tension is raised with local opinion formers and/or significant local people stating their fears. Substantial rise in crime and/or disorder combined with substantial corroborative evidence of other tension indicators. Particular communities or individuals may be targeted. Community and/or criminal intelligence suggests disorder or crime is likely to develop unless responses are developed .
MEDIUM	Corroborated evidence that people in the community in question or across communities fear crime and/or disorder. They expect crime and disorder to happen if no action is taken to prevent it and/or another event serves to increase tension. Crime and/or disorder levels clearly raised above normal . Other tensions indicators e.g. <i>assaults on police, racist graffiti etc</i> , providing corroboration. Levels may indicate targeting specific communities or individuals. Levels well above normal. Community and/or criminal intelligence suggests disorder or crime may develop but that steps can be taken to prevent such development.
LOW - RAISED	Some corroborated evidence of fear of crime or disorder within the community. The crime and disorder feared would be of low intensity . Evidence that crime and/or disorder levels are raised when compared to the normal levels . Raised levels may indicate targeting of particular communities. Levels not substantially above the normal. Information sources do not suggest that crime and/or disorder will develop .
LOW	Limited community concerns that tension will rise and that, even if it did, the impact will be minor. No indication in police crime and disorder reporting that tension is above normal
STEADY STATE	When police are responding and managing incidents and operations as part of everyday responsibilities .

Tension Guide

FUTURE EVENTS

Future event matrix is to be used where an event or incident is predicted or foreseen at the time of C.I.A. completion.

HIGH -IMMINENT	Future event(s), taken alone or in combination, expected to lead to outbreaks of crime and/or disorder within hours
HIGH	Future event(s), taken alone or in combination, expected to lead to outbreaks of crime and/or disorder within days
MEDIUM - HIGH	Future event(s), taken alone or in combination, expected to raise substantially local tension. The expected rise in tension may be localised geographically or within communities
MEDIUM	Future event(s), taken alone or in combination, expected to raise local tension. The expected rise in tension may be localised geographically or within communities.
LOW - RAISED	Future event(s), taken alone or in combination, may lead to limited rising of tension. Any expected tension may be localised geographically or within communities.
LOW	No issues that would impact on local communities sufficiently to cause abnormal tension levels.
STEADY STATE	When police are responding and managing incidents and operations as part of everyday responsibilities .

Community Impact Assessment

SECTION C

RISK ASSESSMENT MATRIX

CURRENT EVENTS	COMMUNITY (HUMAN)	COMMUNITY (STRUCTURE)	RISK TO WITNESS	RISK TO POLICE	RISK TO SPECIFIC GROUP	RISK OF REPLICATION TO OTHER COMMUNITIES
HIGH-IMMINENT	☐	☐	☐	☐	☐	☐
HIGH	☐	☐	☐	☐	☐	☐
MEDIUM-HIGH	☐	☐	☐	☐	☐	☐
MEDIUM	☐	☐	☐	☐	☒	☐
LOW_RAISED	☒	☒	☐	☐	☐	☐
LOW	☐	☐	☒	☒	☐	☒
STEADY STATE	☐	☐	☐	☐	☐	☐

FUTURE EVENTS	ARREST	SEARCH WARRANTS	CHARGE	RELEASE SUSPECT	POLICE ACTION	COURT APPEARANCE	FUNERALS	OTHER
HIGH-IMMINENT	☐	☐	☐	☐	☐	☐	☐	☐
HIGH	☐	☐	☐	☐	☐	☐	☐	☐
MEDIUM-HIGH	☐	☐	☐	☐	☐	☐	☐	☐
MEDIUM	☐	☐	☐	☐	☐	☐	☐	☐
LOW-RAISED	☐	☐	☐	☐	☐	☐	☐	☐
LOW	☐	☐	☐	☐	☐	☐	☐	☐
STEADY STATE	☒	☒	☒	☒	☒	☒	☒	☒

The highest grading selected above should be used as the overall risk assessment level

Overall Risk Assessment is currently set at: LOW

Community Impact Assessment

INITIAL ACTION PLAN

- (1) Support BU in allowing peaceful protest, complying with Article 11 HRA.
- (2) Allocate a local point of contact – PC 3454 Dewi Davies (NPT PC - Bangor).
- (3) District management team attend bi-weekly meeting with BU SMT and Legal to review information and intelligence.
- (4) Local Intel and FIB to continue to monitor social media and submitted CID56.
- (5) Monitor community tension via a community impact assessment (CIA)
- (6) Any incident at the site to be dealt with minimum P1 (Currently 2 crimes recorded).
- (7) Response Duty Sergeant to raise any incident at the site to Pace/Ops Inspector to review response and golden hour principles.
- (8) Response officers and BU Security to be aware of risk from intoxicated persons (nighttime economy) targeting the group during weekend. Suggest passing engagement from Response.
- (9) Information to be fed back to district management and SMT updated via 9.00am and 13.30hrs briefings (or Silver for weekends).
- (10) All contact with BU and protestors via CIA.
- (11) Diversity and Local Authority Cohesion officers aware.
- (12) Feedback to Operation Tarlac and L1 TCCG

Approved by - **SILVER** Name **Inspector Ian Roberts 72763**

ACTION PLAN UPDATES

...

Community Impact Assessment

Log Entry No					10
General update: District management and NPT remain in regular contact with BU. The encampment has now largely been removed with only one tent and a few banners remaining. BU are continuing through the legal process to remove the remainder of the items at location. Protestors are no longer physically at the location and there has been no protest activity at the encampment site of some time.					
Log User ID	...	Date / Time	05/02/2025 16:59:39	Computer	NWP....
Log Entry No					9
Protest encampment remains in situ, district management awaiting update regards BU strategy (comms hindered by BU staff leave over the summer period). There has been no escalation in protest tactics since last CIA update. District management remain in contact with KINS and partner agencies – no community tensions identified. Incidents of note since last update: ...					

Community Impact Assessment

Log Entry No					11
... Next Op Egad meeting scheduled for 03/09 – will hope to have an update from BU by this time.					
Log User ID	...	Date / Time	29/08/2024 11:36:46	Computer	...
Log Entry No					8
From: Dylan Jones (72218) Local Policing <Dylan.PierceJones@northwales.police.uk> Sent: Friday, August 9, 2024 11:56 AM To: Simon Barrasford (71657) Operational Support Services <Simon.Barrasford@northwales.police.uk>; Stephen Pawson (72564) Local Policing <Stephen.Pawson@northwales.police.uk>; Ian Roberts (72763) Local Policing <Ian.Roberts2@northwales.police.uk> Subject: RE: Op Egad Morning, ... no new information of concern provided, and I'll visit again next week. Regards, Dylan Pierce Jones Cwnstabl / Constable 2218					
Log User ID	...	Date / Time	10/08/2024 22:45:59	Computer	NWP....
Log Entry No					7
Retrospective update: Silver meeting held on 31/05/2024 - chaired by Supt Simon Barrasford. Next silver meeting in calendar for 17/06/24.					
Log User ID	...	Date / Time	08/06/2024 12:05:39	Computer	NWP....
Log Entry No					6
Meeting with protest group leader - 05/06/2024. BU and SU also in attendance.					

Community Impact Assessment

Log Entry No					11
.... Meaningful meeting in so much as it was a good start to building trust between protestors and local police. Long terms plans raised by police however protestors very no committal - suggestion their intention is to remain at site over the summer break. Meeting between protestors and local police will take place every 4 weeks to share new information/ intelligence and maintain professional relationship.					
Log User ID	...	Date / Time	08/06/2024 12:02:09	Computer	NWP....
Log Entry No					5
Meeting with Bangor City Council - 31/05/24. No community tensions highlighted.					
Log User ID	...	Date / Time	08/06/2024 11:57:07	Computer	NWP....
Log Entry No					4
Meeting held in Pontio conference room today (29/05) – persons in attendance Insp 2763 Roberts (District), Sgt2793 Dan Dent (SNT), ... Invite was extended to participants of the protest with a request for a spokesperson to attend however this did not occur – ... No set agenda as meeting was intended to develop a relationship between LPS and the protestors. General discussions held around needs, concerns and expectation – Protestors, BU and NWP. Protestor safety was discussed (fire safety, provisions etc). NWP & BU concerns voiced – ... No specific concern, more general welfare and H& S. BU advised NWFS have already attended the protest site and completed a fire safety assessment. BU disruption discussed – BU report no disruption to operations to date. Incident/ crimes reports from the protest site discussed ... NWP expectations set out – we need to open a line of communication with a spokesperson from the protest group in order to develop trust to manage their safety and also share information etc. NWP concerns expressed in respect of the potential impact the protest may be having on Jewish students. NWP have previously extended an invite for talks with the Jewish society but have had no response.					

Community Impact Assessment

Log Entry No					11	
... - ... to make arrange (via colleague) for Jewish Society to be contacted again and clarify if they wish to have a meeting with NWP. - ... to make contact with protestors and request 1/2 spokesperson to attend a meeting. - ... -						
Log User ID	...	Date / Time	29/05/2024 13:56:12	Computer	NWP....	

...