



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

Response Date:23/07/2026

2026/715 - Horus

In response to your recent request for information regarding;

1. Yes or no - has your force shared intelligence with Horus Security Consultancy Ltd since February 2022?

2. If the answer Q1 is yes, has this included intelligence about:

- a. Protest activity**
- b. Student protest activity**

3.Yes or no - has your force received intelligence from Horus Security Consultancy Ltd since February 2022?

4. If the answer to Q3 is yes, has this included intelligence about:

- a. Protest activity**
- b.Student protest activity**

5.How much money have you paid Horus Security Consultancy Limited since February 2022, broken down by what services were paid for (e.g. insight intelligence services, DBS checks)?

6.Copies of of any contracts you hold with Horus Security Consultancy Limited

7.Copies of any Information Sharing Agreements and Data Protection Impact Assessment you hold with Horus Security Consultancy Limited

North Wales Police can neither confirm nor deny whether we hold any information in relation to your request as the duty in Section 1(1)(a) of the Freedom of Information Act 2000 (the Act) does not apply by virtue of the following exemption:

Section 31(3) – Law Enforcement

Confirming or denying whether the Force holds information relevant to this request would, in itself, reveal whether the Force has, or has had, an intelligence-sharing relationship with a named third-party organisation. The request is specifically focussed on the sharing and receipt of intelligence, together with associated contracts, payments, information sharing agreements and data protection documentation. Confirmation would disclose that such a relationship exists, whilst denial would disclose that it does not.

Whether or not a police force maintains an intelligence-sharing relationship with a particular external organisation is capable of revealing information concerning intelligence capabilities,

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operational relationships, and the means by which information is obtained, developed and shared. Disclosure of this information would provide insight into policing intelligence arrangements and could be used to build a broader understanding of how police forces engage with third-party intelligence and security providers.

Furthermore, responses from individual forces could be compared and aggregated, alongside information already available in the public domain, to identify patterns, relationships and differences in policing intelligence arrangements across the United Kingdom. This mosaic effect would enable conclusions to be drawn regarding the existence or otherwise of specific intelligence-sharing relationships and would undermine the ability of policing to conduct its law enforcement functions effectively. Such an outcome would be likely to prejudice the prevention and detection of crime and the apprehension or prosecution of offenders.

Public Interest Test

Factors favouring confirmation or denial - There is a public interest in transparency and accountability regarding relationships between police forces and external organisations. Confirming or denying whether information is held would assist public understanding of how policing obtains and shares information and would contribute to informed public debate regarding intelligence handling, governance arrangements and the use of public funds.

There is also a public interest in providing reassurance that appropriate safeguards, oversight and governance arrangements exist where police forces engage with external organisations in matters relating to intelligence and information sharing.

Factors favouring neither confirming nor denying - There is a significant public interest in protecting the ability of policing to prevent and detect crime and maintain effective law enforcement capabilities. Confirming or denying whether information is held would reveal information concerning intelligence-sharing arrangements and operational relationships with named third parties.

The request is clearly directed towards establishing whether police forces maintain an intelligence-sharing relationship with a named intelligence and security provider. Confirmation or denial would therefore disclose information about policing intelligence arrangements which could be used to build a broader picture of operational capabilities and methods of information acquisition and development.

There is also a strong public interest in preventing incremental disclosures through the mosaic effect. Responses from different police forces could be compared and analysed, allowing conclusions to be drawn regarding the existence or absence of intelligence-sharing relationships. Similarly, confirming or denying the existence of associated contracts, payments, information sharing agreements or DPIAs would reveal information capable of undermining the NCND position and would disclose the very information that the exemption seeks to protect.

There is a strong public interest in ensuring that policing intelligence capabilities, operational relationships and information-sharing arrangements remain effective and are not undermined through the disclosure of sensitive law enforcement information.

Balance Test

Whilst the Force recognises the public interest in openness, transparency and accountability concerning relationships with external organisations, greater weight must be afforded to the public interest in protecting policing intelligence capabilities and law enforcement functions. Confirming or denying whether information is held would reveal information regarding intelligence-sharing relationships and operational arrangements with a named third party. Such information, particularly when combined with information obtained from other forces or sources, would enable conclusions to be drawn about policing intelligence activity and capabilities.

The Force therefore considers that the potential prejudice to law enforcement outweighs the benefits of increased transparency and, accordingly, the balance of the public interest favours maintaining the neither confirm nor deny position under Section 31(3) of the Freedom of Information Act 2000.

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 22/07/2026