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17/08/2026

Freedom of Information request reference number: **2962/2026**

Internal Review Reference Number: **3064/2026**

Thank you for your request for an Internal Review. I am sorry you are disappointed with the outcome of your request for information under the Freedom of Information Act (the Act / FOIA).

The purpose of an Internal Review is to determine whether the original response to a request was handled appropriately and in accordance with the Freedom of Information Act 2000 (FOIA).

I can confirm that I was not involved in the handling of the original request. I have therefore conducted an independent review of the case, considering the request, the response provided, and the steps taken by the original decision-maker.

Applicants Initial Question and response:

Please provide:

1. The information identified in my original question 1, namely any policy, guidance, criteria or procedural documents governing:
 - a) CRU circulation/advice emails issued to police forces or other agencies concerning FOIA requests or requesters;
 - b) circumstances in which requester names may be circulated;
 - c) references within CRU material to WhatDoTheyKnow requests or requester activity.
 2. A copy of the document/reference identified as "CRU 308/24", with any necessary personal data redactions applied, together with the Decision Notice referred to within that document.
 3. The information identified in my original question 6, namely recorded information identifying:
 - a) the police organisations to which CRU circulation/advice references may be disseminated;
 - b) the "other agencies" referred to within CRU circulation material;
 - c) any policy, guidance or criteria governing dissemination beyond police forces.
 4. Recorded information, guidance, policy, enquiries, briefings or other material held and relied upon in support of the statement contained within CRU 603/24 (email dated 25 June 2024, subject "OS – Request for Centurion information – CRU 603/24 – Advice attached") stating:

"I suspect that [SUBJECT] is keeping requests private on that site..."

https://www.whatdotheyknow.com/request/npcc_central_referral_unit_cru_f#comment-124942

This includes any recorded information held concerning:

 - a) whether requests made via WhatDoTheyKnow may be private, concealed or non-public;
 - b) any enquiries, checks or guidance relied upon in making that statement;
 - c) and any formal guidance or policy documents concerning the WhatDoTheyKnow platform relevant to that statement.
- For the avoidance of doubt, I am not seeking personal email addresses or individual recipient details.

I also confirm that this is submitted as a narrowed fresh request following the section 16 advice provided, and is not intended to expand the wording of FOI 2936/2026.

NPCC Response to original request:

Your initial response provided some information with redactions, withheld an entire document via Section 36 and confirmed where information was not held. I have attached it again for reference.

Request for Internal Review:

You requested an Internal Review of the original response on 20th July 2026, as per the below:.

Whilst I am grateful for the disclosure provided, I do not consider that several parts of my request have been fully addressed.

1. Recorded information concerning CRU 603/24

My request did not ask what information is publicly available concerning the WhatDoTheyKnow platform. Rather, I requested:

"recorded information, guidance, policy, enquiries, briefings or other material held and relied upon in support of the statement..."

together with recorded information concerning:

whether requests made via WhatDoTheyKnow may be private, concealed or non-public; enquiries, checks or guidance relied upon in making that statement.

The response instead states:

"No information held. Outside of the Freedom of Information Act, open source research shows..."

before referring to the WhatDoTheyKnow Pro webpage.

That does not answer the request that was made.

The issue is not what information is now publicly available, but what recorded information was held by, or relied upon by, the NPCC when the statement contained within CRU 603/24 was made.

I therefore request that the review specifically determines whether the NPCC's position is that no recorded information whatsoever was held, relied upon or consulted before that statement was made.

2. Decision Notice

My request sought both CRU 308/24 and the Decision Notice referred to within that document.

The response addresses CRU 308/24 but does not address the Decision Notice.

I therefore request confirmation whether the Decision Notice is:

held and withheld;

not held; or

overlooked.

3. Section 36

Whilst I note the reliance upon section 36, the response appears to have treated CRU 308/24 as an indivisible document.

I ask that the review considers whether factual or administrative material, including the existence of the Decision Notice, could reasonably be disclosed following appropriate redaction, rather than withholding the document in its entirety.

4. Completeness of Question 1

The documents disclosed refer to additional CRU processes, updated referral forms, governance documents and revised procedures.

I therefore request confirmation that all recorded information falling within Question 1 was considered during the searches undertaken, and whether any additional responsive documents were identified but withheld.

Context

The significance of Question 4 is reinforced by the disclosed CRU governance material, which demonstrates that requester identity is retained and processed for purposes extending beyond simple case administration, including consideration of repeat requests, "vexatious considerations", applicants working in concert and cross-government requester identification.

Against that background, any recorded basis for the statement made within CRU 603/24 becomes particularly important. If recorded information existed and informed that statement, it falls squarely within the wording of my request. If no such recorded information existed, then I ask that the review confirms that to be the NPCC's position.

NPCC Internal Review Response:

I have considered your request afresh in conjunction with the points raised above which I have numbered below accordingly to address each point.

- 1) Your initial response confirmed that no information is held in relation to part 4 of your original request.
Internal review findings and conclusion: I can confirm the NPCC do not hold any information in relation to part 4 of your request.
- 2) Your initial response withheld CRU advice 308/24 in relation to part 2 of your initial request.
Internal review findings: The NPCC initial response failed to confirm if the ICO Decision Notice was held as referred to in the advice. Additional searches have been made and the decision notice referred to is identified through a link only.
Conclusion: The link in question is provided within this internal review [Decision106-2016.pdf](#)
- 3) Your initial response withheld the entire document via s36(2) for part 2 of your request.
Internal review findings: S36(2) has been applied correctly to the withhold the entire document. Consideration has been given to providing the decision notice referred.
Conclusion: The link to this document is provided above.
- 4) Your initial response confirmed that some information was held in relation to part 1 of your initial request, and this was provided in a redacted format.
Internal review findings and conclusion: I can confirm that the information provided to within your initial response is all the information identified for this part of the request. No additional information was identified and subsequently withheld.

I trust this answers fully your internal review enquiries.

Yours sincerely

Deputy Manager
National Police Freedom of Information and Data Protection Unit (NPFDU) National
Police Chiefs' Council

www.npcc.police.uk

Right of Appeal

If you remain unhappy about how your request has been handled you have the right to apply directly to the information Commissioner. For information on how to make an application to the Information Commissioner please visit their website at www.ico.org.uk alternatively, write to or phone:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Phone: 0303 123 1113