



Mr Philip Swift
Claims Management & Adjusting Ltd
Malling House
Town Hill
West Malling
ME19 6QL

Non-Ops Support PSU
Directorate of professional Standards
Marlowe House
Sidcup
DA15

Email: Feedback@met.police.uk

Your reference:
Our Reference: PC/5233/26

Date: 19/06/2026

Dear Mr Swift,

How we have considered your complaint

I am writing in relation to the complaint you made on 01/06/2026 in relation to your name being shared within an NPCC circular.

The report attached with this letter outlines the actions I have taken to deal with your concerns and explains how I have considered each aspect of your complaint. I hope the report attached addresses your concerns but if you remain unsatisfied you may apply to the Independent Office for Police Conduct (IOPC) for a review; full details of how to request a review and the timescales involved are contained within the report. Further information about the handling of police complaints can be found in the guidance document attached - 'Our Guide To Your Complaint'.

We are committed to developing a learning culture and your complaint has been fully documented and catalogued with the Directorate of Professional Standards as part of the Metropolitan Police's organisational learning.

A survey is being run by the Met Police Complaints Resolution Unit. You are invited to participate in this survey because you have made a complaint, or did so on another person's behalf, in relation to the level of service we provided or

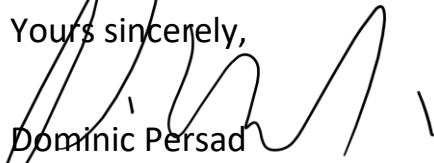
the conduct of our officers. We want to hear your views on how your complaint was handled. This will help us improve what we do. For this reason we value and will act on your feedback. The survey should take you no longer than five minutes to complete.

Survey link: <https://www.londonvoice.org.uk/cru>

In addition to learning from individual cases, we use complaint information from our police complaints system to monitor performance and to identify opportunities for learning and improvement.

Thank you again for taking the time to raise your concerns with us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Dominic Persad', written over the printed name.

Dominic Persad

Complaint Handler

Non-Ops Support PSU

Directorate of Professional Standards

GDPR - Any personal data submitted in the course of making a complaint will be processed and used to provide an outcome to that complaint. Any right to Revi will mean that the MPS will provide that data to the Relevant Review Body for the purpose of conducting that review.

Directorate of Professional Standards

Complaint Report

Protective Marking	Official
Disclosure under FOIA 2000	No
Complaint Reference	PC/5233/26
Person dealing with complaint	Dominic Persad
Organisation / Department / Strand	Non-Ops Support PSU
Appropriate Authority	A/Insp Emma Sweetman
How we have recorded and dealt with your complaint	Recorded under Schedule 3 Police Reform Act 2002 - Handled proportionately otherwise than by investigation
Date Created	15/06/2026

Summary of Incident

You raised concerns regarding a communication issued by the NPCC Central Referral Unit (CRU) dated 25 June 2024 concerning Freedom of Information requests submitted via the WhatDoTheyKnow platform.

You stated that the communication identified you by name, included commentary concerning your conduct as a requester, and was disseminated within the police network and potentially beyond policing bodies. Further concerns were also raised regarding governance, dissemination controls, and the subsequent handling of your correspondence by NPCC personnel.

Your concerns

The concerns listed below set out the nature of your complaint, which we agreed via email on 09/06/2026.

The concerns considered as part of this complaint were:

1. The identification of you within the communication and the content of that communication.
2. The dissemination of the material.
3. The governance and decision-making underpinning the communication.
4. The handling of your concerns by NPCC personnel.

Actions taken to address your complaint

I have taken the following steps to address your concerns, which I consider to be both reasonable and proportionate in the circumstances, to address the matters described above. Where I have not pursued a particular line of enquiry, this is because I believe this would not be reasonable or proportionate, taking into consideration all of the circumstances.

To address all aspects of your complaint I have taken the following actions:

I have taken the following proportionate steps to address your concerns:

- I reviewed the complaint correspondence and supporting documentation provided by you.
- I reviewed the CRU communication dated 25 June 2024 disclosed within the SAR material.
- I reviewed the email correspondence between yourself and NPCC personnel, including responses provided by Chief Inspector Jon Vale.
- I considered the explanations provided by NPCC personnel in relation to the purpose, dissemination, and governance of the communication.
- I reviewed the available material concerning the handling of your subsequent correspondence.
- I considered whether the evidence identified organisational learning or opportunities for service improvement.
- formal written accounts were not considered necessary or proportionate as the correspondence available made a determination possible.

Having considered the nature of the complaint and the available documentary evidence, it was assessed that the matter was suitable for handling proportionately otherwise than by investigation.

A reflection on the service we provided:

Concern number	1
Nature of complaint	The identification of you within the communication and the content of that communication
Officer(s) Members of Staff Identified	NPCC CRU personnel
Our consideration (Our Determination)	I have considered all of the material gathered and consider that the service provided was not acceptable.
Rationale	The material reviewed confirmed that the complainant was identified by name within the communication dated 25 June 2024.

	The communication also included commentary stating that the NPCC “suspected” the complainant was “keeping requests private”. NPCC personnel explained that identification of the requester was intended to assist police forces in recognising related requests and promoting consistency in FOIA handling. While there was a legitimate operational purpose in identifying the requester, limited information was identified demonstrating the evidential basis for the additional commentary concerning “keeping requests private”. In the circumstances, it is recognised that the wording used may reasonably have caused concern to the complainant and that greater care could reasonably have been taken regarding the inclusion of requester-specific commentary.
Action Taken	I have reviewed all of the readily available material
Action Taken Recording Category	Organisational Learning
Learning	The concerns raised have been brought to the attention of relevant NPCC personnel for reflection and organisational learning. Commentary about identifiable individuals must be evidence-based, necessary and proportionate.
Concern number	2
Nature of complaint	The dissemination of the material.
Officer(s) Members of Staff Identified	NPCC CRU personnel
Our consideration (Our Determination)	I have considered all of the material gathered and consider that the service provided was acceptable.
Rationale	The information reviewed supports that the communication was circulated for the purpose of providing guidance in relation to similar Freedom of Information requests received by police forces. NPCC personnel explained that a number of forces had sought advice, and that wider circulation occurred because it was not possible to identify all forces that may have received comparable requests. In that context, broader dissemination was intended to promote consistency in approach. While the available material did not allow the full recipient footprint to be conclusively established, the information reviewed indicates that the communication was intended for circulation within policing-related operational networks.

	No material was identified within the proportionate enquiries undertaken to demonstrate dissemination outside that context. However, the absence of retained recipient information, including distribution lists or associated metadata, limits transparency and creates uncertainty regarding the precise recipient footprint. Within proportionate handling, further enquiries to establish a complete recipient list were not considered necessary or reasonable to determine the substance of the complaint. This represents a shortcoming in record-keeping and auditability rather than evidence of inappropriate dissemination.
Action Taken	Organisational learning has been identified regarding dissemination recording and auditability.
Action Taken Recording Category	Organisational Learning
Learning	Where communications concerning identifiable individuals are disseminated more widely, clear records of recipients and dissemination routes should be retained to ensure transparency, accountability, and auditability.
Concern number	3
Nature of complaint	The governance and decision-making underpinning the communication.
Officer(s) Members of Staff Identified	NPCC CRU personnel
Our consideration (Our Determination)	I have considered all of the material gathered and consider that the service provided was not acceptable.
Rationale	The reviewed material showed that the communication was marked "OFFICIAL-SENSITIVE / POLICE EYES ONLY". NPCC personnel stated that the communication fell within the established remit of the CRU and did not require separate authorisation. While no evidence was identified suggesting deliberate misuse of authority or improper purpose, limited documentary material was identified demonstrating recorded governance considerations, dissemination oversight, proportionality assessment, or formal audit arrangements relating to the communication.

	The material reviewed did not identify evidence of a formal requester-profiling process or deliberate prejudicial handling directed toward the complainant. In the circumstances, clearer governance documentation and recording would reasonably have been appropriate given the nature and dissemination of the material.
Action Taken	I have reviewed all of the readily available material
Action Taken Recording Category	Organisational Learning
Learning	The matters identified have been highlighted for organisational reflection regarding governance recording and oversight arrangements. Where nationally disseminated communications identify individuals or contain evaluative commentary, governance decisions and dissemination arrangements should be clearly documented.
Concern number	4
Nature of complaint	The handling of your concerns by NPCC personnel.
Officer(s) Members of Staff Identified	Chief Inspector Jon Vale and NPCC personnel
Our consideration (Our Determination)	I have considered all of the material gathered and consider that the service provided was not acceptable.
Rationale	The correspondence reviewed established that substantive responses were provided to the complainant by NPCC personnel, including Chief Inspector Vale, prior to the complainant being directed to the Metropolitan Police Service complaints process. The complainant's correspondence raised identifiable conduct and governance concerns at an early stage. While there is no evidence of bad faith or misconduct by NPCC personnel, it is recognised that earlier referral into the formal complaints process may reasonably have provided greater clarity and reassurance regarding the handling of the concerns raised. The correspondence indicating that further engagement would not take place also contributed to the complainant's perception that the substantive concerns remained unresolved.
Action Taken	I have reviewed all of the readily available material
Action Taken Recording Category	Organisational Learning

Learning	Organisational learning has been identified regarding the handling and escalation of complaint-related correspondence. Conduct-related concerns should be promptly considered for formal complaint handling.
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Your right to a review

If you are unhappy with the way your complaint was handled, or with the final outcome, you can apply for a review. Reviews are dealt with by either the Independent Officer for Police Conduct (IOPC) or the Mayor's Office for Policing and Crime (MOPAC) and we have listed the review body for your complaint below.

Relevant Review Body	Independent Office for Police Conduct (IOPC)
Ways to make a review request	- Email - NorthCasework@policeconduct.gov.uk - Online Form – Via the IOPC's website using the following link: https://www.policeconduct.gov.uk/complaints-reviews-and-appeals/reviews-and-appealsIndependent Office for Police Conduct - By post – IOPC, PO Box 473, Sale M33 0BW
Review to be received by	18/07/2026

Thank you for raising your concerns

Thank you once again for contacting us. We are sorry that the service provided didn't meet the standard expected. We are committed to learning and improving our service to build and maintain public trust and confidence. We understand that the outcome of your complaint may not be to your satisfaction, but we would like to thank you for taking the time to raise your concerns.

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