

Gloucestershire Constabulary
Police Headquarters
No.1 Waterwells, Waterwells Drive
Quedgeley, Gloucester. GL2 2AN
www.gloucestershire.police.uk



Your reference:

Our reference: FOI_26_0210

E-mail: FOI

@gloucestershire.police.uk

Direct dial: 01452 754304

Postal Address: As above

Date: 18/06/2026

Dear

Gloucestershire Constabulary Freedom of Information request FOI_26_0210

On 20/02/2026 you sent an email constituting a request under the Freedom of Information Act asking the following:

This request is made under the Freedom of Information Act 2000 (England and Wales), Freedom of Information (Scotland) Act 2002, and the Freedom of Information Act (Northern Ireland) 2000. I request the following information for the period 1 January 2016 to 31 December 2026, where centrally recorded and retrievable without exceeding the statutory cost limit.

For the purposes of this request, special category data includes data revealing or relating to gender, gender identity, legal gender recognition, gender history, and any previously used names.

1. Policy, Procedure & Guidance (Special Category Data)

Please provide copies of any:

- Written force policies
- Standard Operating Procedures
- Internal guidance
- National guidance
- Instruction documents that govern the rectification, amendment, or updating of gender marker data on the Police National
- Computer (PNC) following a person's legal gender recognition, including guidance specific to special category data.

2. Staff Guidance & Training (Special Category Data)

Please provide copies of any guidance, training materials, briefings, or internal instruction provided to:

- Professional Standards Teams
- Data Protection Officers / IG Teams
- Records/PNC administrators
- Custody and detention staff
- Vetting or Disclosure teams that covers processing requests to correct gender marker or special category data on PNC.

3. Statistical Information (2016–2026)

Where centrally recorded, please provide in computer readable format (e.g., CSV, Excel, database export):

- a. Number of requests received to rectify or amend gender marker / special category data on PNC.
- b. Number of requests actioned and rectified.
- c. Number of requests refused or not actioned.
- d. Any recorded reasons for refusal or non action.

If these requests are recorded but not coded specifically as “gender marker” requests, please advise how they are recorded and provide equivalent statistics.

4. Complaints & Legal Escalations

For the period 2016–2026:

- a. Number of formal complaints received relating to failure to rectify gender marker or special category data on PNC.
- b. Number of times your force has engaged in specialist legal action or formal legal review to address gender marker/special category data correction requests.
- c. Any recorded outcomes of such actions.

5. Recording & Categorisation

Please confirm whether your force records requests for gender marker/special category data correction as a distinct category or code in case management, CRM, records, or reporting systems, and provide details of how these are categorised.

6. Operational & Safeguarding Guidance

Please provide:

- a. Policies or guidance that officers, custody staff, and other personnel must follow when encountering a person whose PNC gender marker does not reflect their legal gender.
- b. Any training or guidance on handling such discrepancies safely and respectfully.

- c. Records, summaries, or statistics of incidents where discrepancies between an individual's legal gender and PNC gender markers resulted in safeguarding concerns, operational errors, or harm.
- d. Current mechanisms for urgent correction or override of gender marker data to prevent harm.
- e. Escalation protocols or processes followed when systemic failures in PNC gender marker or other special category data are identified.

Please provide this information in electronic, computer readable form where possible.

7. Information Not Held

If your force does not hold any of the requested information, please confirm this in writing and advise whether the information is held centrally by another policing body (e.g., NPCC, ACRO).

8. Response Timeframe & Acknowledgement

In accordance with the applicable Freedom of Information legislation, I request a response within the statutory timeframe of 20 working days. If I receive an automated acknowledgement, I will accept this as the formal receipt date for the purposes of calculating the statutory response period.

If any part of this request is refused, please cite the precise exemption under the Freedom of Information Act and provide reasons for refusal.

Under the Freedom of Information Act 2000 s1, I can confirm that Gloucestershire Constabulary may hold some relevant information.

Following receipt of your request, searches were conducted by several different business areas and subject matter experts. Regarding complaints and legal escalations, I can confirm that the information you have requested may be held by Gloucestershire Constabulary, however, the records are not held in a format that would allow their extraction within the permitted time constraints. To provide a definitive response would require subject matter experts to search all possible records manually & we have confidently estimated that this part of the request would far exceed the permitted time constraints, therefore Section 12 of the Act is applicable. This section does not oblige a public authority to comply with a request for information if the authority estimated that the cost of complying with the request would exceed the appropriate limit of 18 hours, equating to £450.00

Section 17(5) of the Freedom of Information Act 2000 requires Gloucestershire Constabulary, when refusing to provide information (because the information is exempt) to provide you the applicant with a notice which: (a) states the fact, (b) specifies the exemption in question and (c) states (if not otherwise apparent) why the exemption applies.

In relation to your request Section 12 applies.

Section 12(1) – Fee Regulations states:

Section 1(1) of the Act does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit. (As detailed in the Data Protection and Freedom of Information Fees Regulations of 2004)

The appropriate limit at the moment is £450 calculated at an hourly rate of £25 per hour for all staff time incurred in:

- i. Determining whether information is held
- ii. Locating it
- iii. Retrieving it
- iv. Extracting the information to be disclosed from the other information.

In accordance with the Act, this letter represents a Refusal Notice for your request.

Providing Information Outside of the Act

By way of assistance and although excess cost removes the Force's obligations under the Freedom of Information Act, we have supplied the information relevant to your request which has already been retrieved. We trust this is helpful, but it does not affect our legal right to rely on the fees regulations for the remainder of your request.

- **Policy, Procedure & Guidance (Special Category Data)**
Gloucestershire Constabulary follows national police national computer (PNC) guidance. This is not a Gloucestershire Constabulary document and is therefore not our own data to share. However, you can search the internet for the document through the gov.uk website.

If you are not satisfied with this response or any actions taken in dealing with your request, you have the right to ask that we review your case under our internal procedure. Please note that a request for an internal review must be made within 20 working days of the response to your original request.

If you decide to request that such a review is undertaken and following this process you are still unsatisfied, you then have the right to direct your complaint to the Information Commissioner for consideration.

The Information Commissioner can be contacted via the following means:

Website - <https://ico.org.uk/>

Call their helpline - 0303 123 1113

Email - casework@ico.org.uk

Post –

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Yours sincerely,

Disclosure Officer
Gloucestershire Constabulary