

7 April 2026

FOI Ref 22714

Request - You asked Staffordshire Police (SP) the following:

This request is made under the Freedom of Information Act 2000.

Following your response to FOI Ref 22572, please provide clarification regarding the capability and governance of gender marker data on the Police National Computer (PNC).

1. System Capability

Please confirm whether the Police National Computer (PNC) allows for the amendment or rectification of a person's recorded gender marker following legal gender recognition or other lawful correction of personal data.

2. Authority to Amend

Please confirm: a. Which body or authority is responsible for authorising or processing gender marker corrections on PNC records.

b. Whether this process is handled by your force, by a national policing body, or by a central administrator.

3. Operational Procedure

If a process exists, please provide the recorded procedure or guidance (local or national) that Staffordshire Police follow when requesting or processing such corrections.

4. Data Governance

Please confirm whether incorrect gender marker data on PNC would be considered inaccurate personal data under the UK GDPR data accuracy principle.

5. Escalation

If Staffordshire Police cannot directly amend such data, please identify the organisation responsible for handling these corrections.

If the information is not held locally, please confirm which national body holds it (for example the Home Office, NPCC, or ACRO).

Clarification sent received from applicant:

Thank you for your email. I would like the request to proceed as originally submitted and do not wish to refine it.

SP received your request on 30/03/2026 and have processed this under the Freedom of Information Act (FOIA).

SP's response to your enquiry is as follows:

SP holds the requested information.

- **1. System Capability**

Please confirm whether the Police National Computer (PNC) allows for the amendment or rectification of a person's recorded gender marker following legal gender recognition or other lawful correction of personal data. – **Disclosed, yes.**

- 2. Authority to Amend

Please confirm: a. Which body or authority is responsible for authorising or processing gender marker corrections on PNC records. – **Disclosed, Forces authorise the amendment following interaction with the individual.**

b. Whether this process is handled by your force, by a national policing body, or by a central administrator. – **Disclosed, Home Office add the necessary Gender Reassigned information marker and corresponding text to accompany the marker on PNC.**

- 3. Operational Procedure

If a process exists, please provide the recorded procedure or guidance (local or national) that Staffordshire Police follow when requesting or processing such corrections. – **Disclosed, please see the accompanying file entitled 'FOI 22714 PNC Trans and Gender Reassigned Marker Procedure'.**

- 4. Data Governance

Please confirm whether incorrect gender marker data on PNC would be considered inaccurate personal data under the UK GDPR data accuracy principle. – **Disclosed, yes.**

- 5. Escalation

If Staffordshire Police cannot directly amend such data, please identify the organisation responsible for handling these corrections. – **Not applicable.**

If the information is not held locally, please confirm which national body holds it (for example the Home Office, NPCC, or ACRO). – **Not applicable.**

Please note that this data has been provided to the best of the ability of SP, subject to the limitation of current recording protocols and systems/software.

Every effort is made to ensure that the data presented is accurate and complete. However, it is important to note that this has been extracted from multiple sources, developed for specific policing purposes, for which data extraction methods have not been specifically designed to directly correlate with the terminology of this request. Therefore, the data presented is subject to the inaccuracies and idiosyncrasies inherent in any large-scale recording system.

Consequently, care should be taken in the interpretation and presentation of this data, to not misrepresent the whole or any part of the data disclosed.

Please be advised that all Freedom of Information request responses are published on the SP website although personal details are not included.

Freedom of Information Request Appeals Procedure



STAFFORDSHIRE
POLICE

1. Who Can Ask for a Review

Any person who has requested information from SP, which has been dealt with under the Freedom of Information Act, is entitled to complain and request an internal review, if they are dissatisfied with the response they received.

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing within two months of the date of receipt of this email, and should be addressed to:

IAT@staffordshire.police.uk

Or by Post to:

Information Access Team
Staffordshire Police HQ
PO Box 3167
Stafford
ST16 9JZ

The reference number, date of the request and details of why the review is being requested must be included. Requests for review should be brought to the attention of the Information Access Team within two months of the SP response to the original FOI request.

3. Review Procedure

Receipt of a request for review will be acknowledged in writing. The review will be conducted by a supervisor who is independent from the original Decision Maker. The Information Access Team will set a target date for a response. The response will be made as soon as is practicable with the intention to complete the review within twenty working days. In more complex cases the review may take up to forty working days.

The independent supervisor will conduct a review of the handling of the request for information and of decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case, considering the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the independent supervisor will reply to the appellant with the result of the review. If the appellant is still dissatisfied following the review they should contact the Information Commissioner to make an appeal. The Information Commissioner can be contacted via the following link: <https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

Freedom of Information
Information Access Team