HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

Response Date:21/10/2026

2026/1117 - Interview

In response to your recent request for information regarding;

Under the Freedom of Information Act 2000, I request an electronic copy of the video and audio recording of the police interview or interviews conducted with Stephen Hough during the reopened investigation into the January 1976 death of Janet Commins in Flint, North Wales.
Stephen Hough was tried at Mold Crown Court in 2017 and convicted of manslaughter, rape and buggery. He was acquitted of murder. A documentary titled *Made for Murder: Stephen Hough* includes footage described as police questioning in 2017 concerning the historic case.
Specifically, I request:

1. **The complete available audio and video recording of Stephen Hough's police interview or interviews during the reopened investigation in 2016–2017 concerning Janet Commins's death.**
2. **The full original recording corresponding to the interview footage shown in *Made for Murder: Stephen Hough*, if held by North Wales Police.**
3. **Any separate camera-angle recordings or associated audio files for those interviews, if maintained.**

The information you have requested constitutes personal data of which you are not the subject and disclosure of the information to a member of the public otherwise than under the Data protection Act 2018 would contravene the data protection principles.

Section 40 is a class based exemption, therefore it is not necessary to evidence harm caused by disclosure.

The data protection rights of a third party would be breached by disclosure, therefore section 40(2) is an absolute exemption and a Public Interest Test is not necessary. This is so because personal data is governed by another law (The Data Protection Act 2018) and there are two elements to this exemption.

All requests made under FOIA are applicant blind. A request must be treated as such and a public authority will always view any disclosure as into the public domain. Thus North Wales Police must be satisfied that any release of information will be potentially available to the general public. It is therefore on this basis that the following is relevant.

The first element of this exemption is engaged if the information requested constitutes personal data and is made by the data subject. The information will be covered by section 40(1) and the request will be dealt with under the Data Protection Act, rights of access.

The second element of this exemption is engaged if the personal data is about someone other than the applicant. Where someone makes an application for information other than the data subject, disclosure of that information will often constitute a breach of the Data Protection Act covered by section 40(2).
Personal data is regulated under the principles of the Data Protection Act and when information contains personal data about a third party it can only be refused if disclosure would breach any of the data protection principles.

As previously highlighted, any disclosure under the FOIA is a public disclosure and release of the identity of an individual would breach principles 1 & 2 of the Data protection Act 2018.

These principles require that: 1) the processing of personal data for any of the law enforcement purposes must be lawful and fair and 2) the law enforcement purpose for which personal data is collected on any occasion must be specified, explicit and legitimate.

'Data subjects' are provided with certain legal enforceable rights under the Data Protection Act 2018. The fact that the information is held for lawful policing purposes, disclosing it onwards would breach the principles, and would be incompatible with the data subject's right that their data is held securely. By disclosing this information, the force could be subject to enforcement proceedings under the act if it breaches any of those principles.

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 20/10/2026