



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

Response Date: 07/04/2026

2026/239 - PNC Gender Marker & Special Category Data (2016–2026)

Although excess cost removed the forces obligations under the Freedom of Information Act, as a gesture of goodwill, I have supplied information, relative to your request, retrieved or available before it was realised that the fees limit would be exceeded. I trust this is helpful, but it does not affect our legal right to rely on the fees regulations for the remainder of your request.

In response to your recent request for information regarding;

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.**

North Wales Police do not hold any Policies or SOPs on this topic.

Please find attached information that relates to Para 1 and National guidance.

The attached includes a document relevant to the National Standards for recording such information;

Pencadlys yr Heddlu,
Glan-y-Don, Bae Colwyn LL29 8AW
www.heddlugogleddcymru.police.uk

Police Headquarters,
Glan-y-Don, Colwyn Bay LL29 8AW
www.northwales.police.uk

**Yn gwneud Gogledd Cymru'r lle mwyaf diogel i fyw, gweithio ac ymweld yn y DU
Making North Wales the safest place to live, work and visit in the UK**

- National Protected Characteristic Code Scheme - August 2025

[Protected characteristics and personal information: Guidance for forces in requesting workforce data](#)

[Microsoft Word - Protected Characteristics Operational Recording Data Standard Version 1 31st March 2023](#)

You may wish to also make a request direct to the College of Policing:

[Freedom of information \(FOI\) | College of Policing](#)

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.

We do not currently deliver training on Person Update on PNC due to the imminent move over to LEDS Person update.

We do not hold any material that specifically 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.

North Wales Police do not have any formal Data Protection rectification requests on this topic.

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.**

Our information is set up and searchable for our policing purposes. The IOPC Complaint Factors do not categorise complaints under a heading of "failure to rectify gender marker or special category data on PNC". To obtain the information in the format you have requested would involve manually reviewing over 5000 records on our force system. The cost of providing you with the information is above the amount to which we are legally required to respond i.e. the cost of retrieving the information exceeds the 'appropriate level' as stated in the Freedom of Information (FOI) Fees and Appropriate Limit regulations 2004.

Therefore, in accordance with the FOI Act 2000 the information you have requested is exempt under Section 12 (1), and this letter acts as a Refusal Notice under section 17 (5) of the legislation.

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.

Please see the answer to 5a, however North Wales Police Legal Dept are not aware of any.

c. Any recorded outcomes of such actions.

Please see the answer to 5a, however North Wales Police Legal Dept are not aware of any.

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.

North Wales Police do not hold any Policies on this topic.

c. Any training or guidance on handling such discrepancies safely and respectfully.

North Wales Police do not hold any information.

d. 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.

Please see the answer to Q4a.

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.

North Wales Police do not hold any information.

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 18/03/2026

Revised Code Scheme

Disability		
Part 1 : Compliant with Code		No changes required.
Part 2:		
Existing options include	New Code Requirement	Changes needed
ADHD	ADHD	Nil
Autism	ASD, Aspergers or another condition with differences in communication and interaction	Add – rename ‘Autism.’
Auto Immune	Blindness or visual impairment	Add – rename ‘Visual Impairment.’
Cardiac	Deafness or Moderate to severe hearing loss	Add – rename ‘Hearing.’
Diabetes	Dyslexia, Dyspraxia, Dyscalculia, Dysgraphia, or another learning difference	Add – rename and aggregate all ‘Dyslexia,’ ‘Dyspraxia,’ and ‘Learning Difference’ responses.
Downs	Long term illness. For example, cancer, HIV (Human Immunodeficiency Virus), diabetes, chronic heart disease or epilepsy	Add NEW – include ‘Cardiac’ responses.
Dyslexia	Mental Health Condition. For Example, PTSD (Post Traumatic Stress Disorder), depression, schizophrenia, or anxiety disorder	Add – rename ‘Mental Health.’
Dyspraxia	Physical disability or mobility issue. For example, impaired use of arms or legs, use of wheelchair or crutches	Add – rename and aggregate all ‘Mobility’ and ‘Physical’ responses.
Hearing	Neurological or Movement Disorder, Tic Disorder or TS (Tourette’s Syndrome)	Add NEW
Learning Difference	Another disability, health condition or impairment affecting daily life. For example, Colitis, Crohn’s, Fibromyalgia, ME, MND, etc.	Add – rename ‘Other.’
Mental Health	No, I do not have any of the above	Not required
Mobility	Prefer not to say	Nil
Multiple Sclerosis	Additional work may be required to amend the guidance / definition and question in the new code	
Other		
Physical		
Prefer Not To Say		
Respiratory		
Sensory		
Visual Impairment		
Requires consultation. Remaining Options:		
a) either delete all options not included in the new code (e.g. ‘Diabetes,’ ‘Downs,’ ‘Multiple Sclerosis’ etc.), and migrate responses to ‘Other,’ or		
b) keep all existing options not included in the new code and aggregate under ‘Other’ when reporting nationally.		

Gender Identity (not a Protected Characteristic) / Gender Reassignment

Current NWP Question Set	New Code Requirement	Changes Required
Gender Reassignment	Gender Reassignment	No change to title
	<i>Do you identify with the Protected Characteristic of Gender Reassignment?</i>	Question not used – no change
Codes	Response Options	No change to options
☐ Yes ☐ No ☐ Prefer not to say	☐ Yes ☐ No ☐ Prefer not to say	
Gender Identity	Gender Identity	No change to title
	<i>What is your Gender Identity?</i>	Question not used – no change
Codes	Response Options	Remove 'Self Describe Gender Identity' free text option. Add 'Other.'
☐ Man ☐ Woman ☐ Non-binary ☐ Prefer to self describe (free text) ☐ Prefer not to say	☐ Woman ☐ Man ☐ Non-Binary ☐ Other ☐ Prefer not to say	

Nationality (not a protected characteristic)

As people often hold “dual nationality,” NWP provide 2 x “Nationality / Citizenship” options each with a full dropdown list of Nationalities.

No change.

Sex

Current NWP Question Set	New Code Requirement	Changes Required
Sex	Sex	No change to title
	<i>What is your sex?</i>	Question not used – no change
Codes	Response Options	Remove “Intersex.” Add “Prefer not to say.”
○ Female ○ Male ○ Intersex	○ Female ○ Male ○ Prefer not to say	