

20 September 2024

FOI Ref 17097

Request - You asked us the following:

Custody Records and PACE Code C Compliance:

1. Has your police force previously allowed (or otherwise permitted), and/or does it currently allow (or otherwise permit), the use of ellipses ("...") within custody records? Please confirm this explicitly with a 'yes' or a 'no' as your response.

Statutory Requirements and Compliance:

2. Please provide a copy of your internal guidelines, guidance, policies, and procedures that relate to the accurate and complete recording of your Force's custody records in accordance with PACE Code C.

3. Provide a copy of the specific internal directive, policy, guidance, and procedures (created and or updated within the last 5 years) that detail the permissible use of ellipses within your Force's custody records under your Force's internal guidelines and policies?

Audit and Oversight:

4. Have there been any internal or external audits, reviews, or assessments of your Force's custody record practices (within the last 10 years or alternatively, and in the public interest, such lesser period or reduced outer limit of what your Force considers to be a reasonable time- frame)? If so, please provide copies of these documents.

5. Has there been any correspondence, guidance, or instructions from oversight bodies such as the Independent Police Complaints Commission (IPCC), Independent Office for Police Conduct (IOPC) or Home Office regarding your Force's custody records? If so, please provide copies of these documents.

Additional Information:

6. Please include all disclosable correspondence, directives, or communications which you hold that clarify the permissible practices for recording information in custody records under PACE Code C.

We received your request on 29/07/2024 and have processed this under the Freedom of Information Act (FOIA).

Please find below our response.

Staffordshire Police holds the following requested information.

Custody Records and PACE Code C Compliance:

1. Has your police force previously allowed (or otherwise permitted), and/or does it currently allow (or otherwise permit), the use of ellipses ("...") within custody records? Please confirm this explicitly with a 'yes' or a 'no' as your response. – **Information held.**



Statutory Requirements and Compliance:

2. Please provide a copy of your internal guidelines, guidance, policies, and procedures that relate to the accurate and complete recording of your Force's custody records in accordance with PACE Code C. – **Information held.**
3. Provide a copy of the specific internal directive, policy, guidance, and procedures (created and or updated within the last 5 years) that detail the permissible use of ellipses within your Force's custody records under your Force's internal guidelines and policies? – **No information held.**

Audit and Oversight:

4. Have there been any internal or external audits, reviews, or assessments of your Force's custody record practices (within the last 10 years or alternatively, and in the public interest, such lesser period or reduced outer limit of what your Force considers to be a reasonable time- frame)? If so, please provide copies of these documents. – **Information held.**
5. Has there been any correspondence, guidance, or instructions from oversight bodies such as the Independent Police Complaints Commission (IPCC), Independent Office for Police Conduct (IOPC) or Home Office regarding your Force's custody records? If so, please provide copies of these documents. – **No information held.**

Additional Information:

6. Please include all disclosable correspondence, directives, or communications which you hold that clarify the permissible practices for recording information in custody records under PACE Code C. – **Information held.**

Staffordshire Police discloses/withholds the following information.

Custody Records and PACE Code C Compliance:

1. Has your police force previously allowed (or otherwise permitted), and/or does it currently allow (or otherwise permit), the use of ellipses ("...") within custody records? Please confirm this explicitly with a 'yes' or a 'no' as your response. – **Disclosed, yes.**

Statutory Requirements and Compliance:

2. Please provide a copy of your internal guidelines, guidance, policies, and procedures that relate to the accurate and complete recording of your Force's custody records in accordance with PACE Code C. – **Disclosed, please see accompanying file titled 'FOI 17097 Statutory Duty Compliance of Custody Records Data.PDF'.**

Audit and Oversight:

4. Have there been any internal or external audits, reviews, or assessments of your Force's custody record practices (within the last 10 years or alternatively, and in the public interest, such lesser period or reduced outer limit of what your Force considers to be a reasonable time- frame)? If so, please provide copies of these documents. – **Withheld.**

Additional Information:

6. Please include all disclosable correspondence, directives, or communications which you hold that

clarify the permissible practices for recording information in custody records under PACE Code C.
– **Disclosed, please see accompanying file titled 'FOI 17097 Statutory Duty Compliance of Custody Records Data.PDF'.**

The above information has been withheld for the following reasons:

In accordance with Section 17(1) of the Freedom of Information Act, this letter represents a refusal notice for parts of this particular request.

The information can already be found within the public domain.

The following exemptions have been applied:

- Section 21(1) - Information reasonably accessible by other means.
- Section 21 is an absolute, class-based exemption and as such there is no requirement to quantify the harm that may arise from the disclosure, nor is there a requirement to perform a Public Interest Test.

Public Interest Test

Not Applicable

Advice and assistance

In order to comply with our obligations under Section 16 of the Act, the obligation to provide advice and assistance, please find below links to the information requested.

- <https://staffordshire-pfcc.gov.uk/get-involved/independent-custody-visitors/>

In relation to question 5, please note that the information would sit with the IOPC to answer in relation to their guidance or their instructions to relevant forces regarding custody records.

Next steps

You can ask us to review our response.

If you would like us to carry out a review of our response, please let us know within two months of the date of receipt of this email, review requests should be addressed to:

foi@staffordshire.police.uk

Or by Post to:

Central Disclosure Unit
Staffordshire Police HQ
PO Box 3167
Stafford
ST16 9JZ



STAFFORDSHIRE
POLICE

Please remember to quote the reference number in any future communications.

Freedom of Information
Central Disclosure Unit