



STAFFORDSHIRE
POLICE

Our Ref: FOI 17985
Your Ref: FOI 17927
Date: 07 April 2025

Many thanks for your further correspondence and the questions raised relating to our recent Internal Review of FOI 17927, specifically in relation to our response regarding question 2 of this request. In order to clarify our stance and the methodology employed in attempting to acquire the relevant data, I will attempt to provide an answer to these further questions listed below.

1. *It is not explained how you [sic] searches are undertaken, what system is used, what advanced searching facility exists, which departments were approached:*
2. *Is the 54k of messages across the constabulary of specialist departments*
3. *Have searches been undertaken using 'MoU' +NPCC and separately 'MoU' and ICO, or the specific email addresses for the se [sic] organisations i.e. about the ICO, icocasework@ico.org.uk . The NPCC 'lead' for information would likely be a more specific email address.*
4. *Reference to 'ABI' and 'Abigale' suggests a bland search, no use of Boolean operators*
5. *It appears unlikely that anyone other than specific (senior/supervisory?) officers would be associated with emails about the MoU to the ICO or NPCC.*

Firstly, in attempting to answer any question submitted under the Freedom of Information Act, the Act requires us to establish whether a request is valid and in doing so interpret the questions posed and therefore determine the information being requested.

In this instance, we have interpreted question 2 of FOI 17927 as follows:

'2. exchanges on the subject internally, with the ICO and NPCC'

This question is intrinsically linked to question 1, which asks for:

'Since the last NPCC/ABI MoU (mid 2022*) please provide the following information you possess about: 1. the disclosure of crime reports to other than ABI members;

From the questions posed and the preface provided, we have concluded that question 2 of your request requires all communication which has been sent or received i) internally, ii) with the ICO, iii) with the NPCC - where this relates to the subject of *'the disclosure of crime reports to other than ABI members'* where this has occurred *'Since the last NPCC/ABI MOU (mid 2022)'*

This would include:

- email (including any form of instant messaging)
- terrestrial mail
- transcripts of telephone conversations (where held)

In order to establish what information was held, initially a search of our email retention database was conducted using the operands 'ABI' & 'Association of British Motor Insurers' and the Boolean operator 'OR' applied to ensure all emails would be included where either one or other of these operands appeared. We appreciate that your request relates to **'the disclosure of crime reports to other than ABI members'**; however, this question is extremely broad and would encompass the force wide disclosure of Crime Reports for any purpose to any recipient other than an ABI member organisation, where this had occurred **'Since the last NPCC/ABI MoU (mid 2022*)'**. Therefore, in order to narrow our searches, we used the operands outlined above in order to try to identify such disclosures.

We hope this clarifies our initial methodology in interpreting your request, I will now attempt to address the questions posed within your latest correspondence.

1. It is not explained how you searches [sic] are undertaken, what system is used, what advanced searching facility exists, which departments were approached:

Searches were initially undertaken on our email archiving system, using the following operands:

- Date parameters: Last two years (Our email retention policy is two years)
- From/To – this field was left blank in order to include all emails, both externally and internally
- Keywords 'ABI' or 'Association of British Motor Insurers' – this would then capture any emails where either operand appeared within either the subject line of the email or the body of the text.

The search returned circa 55,000 results within the time period specified, it was noted that many of these were unrelated for the reasons outlined in our Internal Review letter. In an attempt to further filter these unrelated emails from our results, it was considered whether a case sensitive search could be employed; however, no such function exists within our interrogation software.

Due to the broad nature of the question, specifically **'exchanges on the subject internally'** particularly in relation to **'the disclosure of crime reports to other than ABI members'** we could not determine any specific departments to approach as this would potentially encompass all areas of the force.

2. Is the 54k of messages across the constabulary of specialist departments

As no specific area of the force has been specified and all internal communication has been requested, as outlined above, all departments and individuals force wide would be included within the parameters of this search.

3. Have searches been undertaken using 'MoU' +NPCC and separately 'MoU' and ICO, or the specific email addresses for the se [sic] organisations i.e. about the ICO

Consideration was given as to whether the operand 'MOU' should be included within the parameters of the searches conducted; however, it was our interpretation that your request was not specific to the MOU itself and that this did not form the basis of the requested information. From the wording of your request, we construed that the acronym 'MOU' was used specifically as a timescale indicator i.e. **'Since the last NPCC/ABI MoU (mid 2022*)'**.

With regard to compound searches using both ABI/Association of British Motor Insurers and either ICO or NPCC, this was also considered but we concluded that these would not address your requirement for **'exchanges on the subject internally'**.

4. Reference to 'ABI' and 'Abigale' suggests a bland search, no use of Boolean operators

As stated above, multiple compound search parameters or throttles were considered and eschewed for the reasons outlined.

5. It appears unlikely that anyone other than specific (senior/supervisory?) officers would be associated with emails about the MoU to the ICO or NPCC.

As stated above, we have interpreted questions 1 and 2 of your request to define the information required, this states: ***please provide the following information you possess about: 1. the disclosure of crime reports to other than ABI members; 2. exchanges on the subject internally, with the ICO and NPCC'***

Therefore, we have not searched specifically for **'emails about the MOU'** or used MOU as a search operand, we have interpreted this merely to indicate the timescale required i.e. **'Since the last NPCC/ABI MoU (mid 2022*)'**. Again, as you have stated that you require **'exchanges on the subject internally'**, no filters have been applied to limit the sender or recipient.

Any further request now received on the topics covered within this letter will be treated as vexatious under the FOI Act, correspondence to other departments within Staffordshire Police on the above topics will not be responded to.



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If you are not content with the outcome of the review, you may apply directly to the Information Commissioner to investigate. The Information Commissioner can be contacted at:

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

ICO Website for complaints link: <https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

Central Disclosure Unit Management Team
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