

24 April 2025

FOI Ref 21257

Request - You asked us the following:

Under the Freedom of Information Act 2000, please provide the following information about your procurement of any

- (i) external Data Protection Officer (DPO),
- (ii) Data protection GDPR compliance services for the period FY2022-23 to FY2024-25:

1. Current DPO arrangements

1.1 Is the organisation's DPO and other staff that work on data protection compliance:

- (a) An internal employee
- (b) A DPO provided by an external service provider
- (c) Hybrid (internal staff with external service provider support)

1.2 Where services are provided by external providers, please share the following information:

- (a) The Company name(s)
- (b) Annual spend by your organisation (FY2022/2023 through to FY2024/2025)
- (c) The highest day rate paid
- (d) Contract dates (start/end/renewal terms)
- (e) A brief description of the project or services provided (for instance, project title or internal reference)
- (f) Services covered (e.g., audits, breach management, SAR management, delivery of DPIAs)
 - Please indicate what deliverables were produced
 - Procurement method (e.g., open competition, framework agreement, direct award) and name of the procurement framework, if applicable.

2. Consultancy Spend

2.1 What is the organisation's, total annual expenditure on data protection/GDPR consultancy services?

2.2 For SoW/projects which have a spend of more than £5k, please share the following information:

- Supplier company name
- The scope of the Project (e.g., ICO investigation support, DPIA support, Internal Audit recommendation support)
- Spend
- Procurement method

3. Data Protection Compliance staffing

3.1 The Number of in-house data protection staff in the organisation?

(FTE)

3.2 Are there any vacant roles? (Yes/No)



3.3 Where there any ICO investigations, audits, or enforcement actions for the period from FY2022/2023 to FY 2024/2025?

4. Future Plans

4.1 Is your organisation planning to put out to tender for any DPO/GDPR services in the current financial year?

4.2 If yes please provide the following:

Expected timeline

Budget range

Key service requirements

Procurement method

We received your request on 24/04/2025 and have processed this under the Freedom of Information Act (FOIA).

Staffordshire Police's response to your enquiry is as follows:

Staffordshire Police holds/does not hold the requested information.

1. Current DPO arrangements

1.1 Is the organisation's DPO and other staff that work on data protection compliance:

- (a) An internal employee – **Disclosed, yes.**
- (b) A DPO provided by an external service provider – **Disclosed, no.**
- (c) Hybrid (internal staff with external service provider support) – **Disclosed, no.**

1.2 Where services are provided by external providers, please share the following information:

- (a) The Company name(s) – **Not applicable.**
- (b) Annual spend by your organisation (FY2022/2023 through to FY2024/2025) – **Not applicable.**
- (c) The highest day rate paid – **Not applicable.**
- (d) Contract dates (start/end/renewal terms) – **Not applicable.**
- (e) A brief description of the project or services provided (for instance, project title or internal reference) – **Not applicable.**
- (f) Services covered (e.g., audits, breach management, SAR management, delivery of DPIAs) – **Not applicable.**

Please indicate what deliverables were produced

- Procurement method (e.g., open competition, framework agreement, direct award) and name of the procurement framework, if applicable. – **Not applicable.**



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2. Consultancy Spend

- 2.1 What is the organisation's, total annual expenditure on data protection/GDPR consultancy services? – **Disclosed, nil.**
- 2.2 For SoW/projects which have a spend of more than £5k), please share the following information:
Supplier company name
The scope of the Project (e.g., ICO investigation support, DPIA support, Internal Audit recommendation support)
Spend
Procurement method – **Not applicable.**

3. Data Protection Compliance staffing

- 3.1 The Number of in-house data protection staff in the organisation? (FTE) – **Disclosed, 1.**
- 3.2 Are there any vacant roles? (Yes/No) – **Disclosed, no.**
- 3.3 Where there any ICO investigations, audits, or enforcement actions for the period from FY2022/2023 to FY 2024/2025? – **Withheld, please see below.**

4. Future Plans

- 4.1 Is your organisation planning to put out to tender for any DPO/GDPR services in the current financial year? – **No information held.**
- 4.2 If yes please provide the following:
Expected timeline
Budget range
Key service requirements
Procurement method – **Not applicable**

The following exemption has been applied:

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

- 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.

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://ico.org.uk/media2/migrated/4032260/staffordshire-police-audit-executive-summar.pdf>
- <https://ico.org.uk/media2/migrated/4032076/staffordshire-police-pr-20241119.pdf>



- <https://ico.org.uk/action-weve-taken/decision-notice/?term=staffordshire>

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

Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

Any person who has requested information from Staffordshire Police, 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:

foi@staffordshire.police.uk

Or by Post to:

Central Disclosure Unit
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 Central Disclosure Unit within two months of the Force's 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 another Decision Maker who is independent from the original Decision Maker. The Central Disclosure Unit 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 20 working days. In more complex cases the review may take up to 40 working days.

The independent Decision Maker 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, taking into account the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the Independent Decision maker will reply to the complainant with the result of the review. If the complainant is still dissatisfied following the review they should contact the Information



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Commissioner to make an appeal. The Information Commissioner can be contacted via the following details:

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/>

Freedom of Information
Central Disclosure Unit