

Our Ref: FOI 22230
Your Ref: FOI 22199
Date: 12 December 2025

Internal Review

Re: Request for internal review of response to application for information under the provisions of the Freedom of Information Act 2000, original request first notified to Staffordshire Police on 2nd December 2025.

We refer to the above request which was expressed in the following terms:

To assist in resolving this complaint, please provide the following information under the Freedom of Information Act 2000 (if applicable) or as part of your response:

1. The date when Police first became aware of potential issues with the misleading wording on the DOB field, including any internal reviews, audits, or prior complaints on this topic.
2. The total number of submissions to the online complaint form where DOB was provided, aggregated by year (to protect privacy), since the form's launch.
3. The date when the current version of the online complaint form (including the DOB field and its stated rationale) was first made available to the public.

Further to the above, we also note the following comments made within your request for Internal Review.

Thank you for your recent email .I must respectfully point out that my original submission was, and remains, a request for recorded information made under the Freedom of Information Act 2000, namely: "Any recorded information held by Staffordshire Police explaining why a date-of-birth field is mandatory on your online public complaint/contact form, including (but not limited to) any data protection impact assessment, legal advice, policy document, or correspondence concerning the collection and retention of date-of-birth data via that form."

Staffordshire Police is the data controller for the form hosted on its own website and therefore holds the requested information.

The Freedom of Information Act 2000 places a clear legal duty on your force (under section 1) to confirm or deny whether this information is held and, if it is held, to communicate it or issue a valid refusal notice citing an exemption. Directing me to the National Police Chiefs' Council does not discharge that statutory duty, because the NPCC is not the public authority that received the request and is not the controller of the form in question. Accordingly, please now treat this email as my formal request for an internal review of your handling of my FOI request. I ask that the review specifically addresses:

1. Why my request has not been recognised and processed under the Freedom of Information Act 2000.
2. Why no confirmation or denial has been provided (s.1(1)(a) FOIA).
3. Why no refusal notice citing a specific exemption has been issued (s.17 FOIA)



STAFFORDSHIRE
POLICE

Response from Staffordshire Police (SP)

SP have now completed the Internal review.

SP will respond to your three questions as follows:

1. Why my request has not been recognised and processed under the Freedom of Information Act 2000.
You initially contacted Staffordshire Police on 2nd December 2025. Your email was forwarded to the FOI team who logged the request (ref 22199) and an acknowledgement was sent to you the same day. Your request was processed as an FOI request, and a formal response was sent to you on 4th December 2025.
2. Why no confirmation or denial has been provided (s.1(1)(a) FOIA).
There was no requirement to do this because the s12 exemption was applied to the entire request in accordance with ICO guidelines.
3. Why no refusal notice citing a specific exemption has been issued (s.17 FOIA)
A section 17 refusal was included within the response letter. Section 12(1) was then clearly cited, and a rationale was included as to why.

Under s16 of the FOI Act (requirement to offer advice and assistance), it was then explained within the response letter that you may wish to contact the NPCC given that the form used on the Staffordshire Police website was designed by the NPCC.

Staffordshire Police are of the opinion that the exemption outlined within the response letter was fully justified and that the rationale for its application was conveyed clearly and unequivocally.

Please be advised that all FOI requests and response letters are published on the Staffordshire Police website although personal details are not included.

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

Information Access Team Management
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