



FREEDOM OF INFORMATION (FOI) ACT RECOMMENDATIONS; ACTION PLAN

in response to the ICO Practice Recommendations;

staffordshire-police-pr-20241119.pdf

21st January 2025

Part 4 – time limits for responding to requests:

Section 4.1 of the Code highlights the “clear” requirement that public authorities respond to requests for information promptly, and within 20 working days of receipt in accordance with section 10(1) of FOIA.

	Recommendation	Staffordshire Police (SP) response
1	Staffordshire Police should ensure that requests for information are responded to in a timely manner.	Stability has been provided for the FOI team with the operating model of 3 permanent Full Time Equivalent (FTE) posts now filled. The review of Information Governance and Assurance (IGA) will explore if 5 FTE posts are needed as indicated by workload profiler.
2	Staffordshire Police should use the Commissioner's FOI self-assessment toolkit to improve its timeliness compliance.	This was done in 2023 with an unsatisfactory rating. This has not changed as of November 2024. It will be re done in January 2025 when the stabilisation of the staffing has taken effect.
3	Staffordshire Police should ensure that it has adequate levels of resource within its Information Rights teams to ensure that FOI requests, and internal reviews, are processed in a timely manner.	Peer review has been completed, work ongoing in terms of capability and capacity in Central Disclosure Unit (CDU) functions. At present no back log to FOI requests wider demands of the dept are being assessed. The current Target Operating Model (TOM) in the FOI team is 3 FTE and Supervisors (for internal reviews and within the Central Disclosure Unit as a whole) is 3 FTE. Workload profiler indicates that there should be 5 FTE in FOI and 4.9 FTE Supervisors
4	Staffordshire Police must ensure that its information rights training is sufficient to ensure that it has adequate coverage in place in order that request handling times do not fall below a compliant level in the event of the departure of key staff members.	The Central Disclosure Unit staff complete the basic College of Policing FOI online package as a mandatory yearly task. The completion of the course as a one-time event is also mandatory for all of the organisations staff and officers. The FOI team also attends the National Police Chiefs Council (NPCC) FOI Fundamental Training 1-day course and the NPCC Intermediate Training 2-day course. The NPCC recently consulted with forces about the refresher training requirements. Early indications seem to point at forces opting for a refresh training course to be put in place. SP will ensure all staff are appropriately trained and have access to refresher training when available
5	Staffordshire Police should also ensure that staff within its various departments responsible for request	The mandate of completion of the FOI College Learn training package should ensure that individuals understand their obligations. Every request sent from the FOI team to a department specifies a date by

	handling are also aware of the importance of processing requests in a timely manner.	which a response should be received, this date is 5 working days from the date sent. Reminder has gone out on the SP internal intranet 31/12/2024 and in our staff e-newsletter
6	Staffordshire Police must implement an Action Plan which should be published on its website by 31 of January 2025 for full transparency about the improvements it is making.	Action plan has been produced.
7	Staffordshire Police should ensure that the Action Plan incorporates appropriate processes being put in place to ensure both the backlog of overdue requests is cleared and 90% timeliness compliance is consistently achieved by 1 of March 2025.	There is no backlog, all requests have been cleared. December compliance was 97%
8	In accordance with part 8.5 of the Code, Staffordshire Police should publish its information access request statistics and make these easily accessible on its website. The statistics should include the number of information access requests that have not been processed and the number of completed requests where the processing took longer than 20 working days.	SP publish figures in line with the Cabinet Office Freedom of Information Code of Practice and have done so since 2020, in line with retention schedules statistics from 2022 onwards are available on the SP website. In addition, SP provide a link to the Staffordshire Data Collection which is the Information Rights statistics returned to NPCC in a format of their request. Links are provided below; 2022-foi-statistics.pdf 2023-foi-statistics.pdf 2024-foi-statistics.pdf staffordshire-data-collection-2022.pdf staffordshire-data-collection-2023.pdf staffordshire-data-collection-to-end-of-may-2024.pdf staffordshire-data-collection-from-june-2024.pdf
9	Staffordshire Police's request handling procedures should include provision for when a response is late, or is likely to be late at any stage of the internal processes, it is clear when and to who to escalate, who is responsible for taking action, the action they will need to take, and by when	The escalation process is described, with a flow chart, in the FOI guidance manual for CDU staff, this manual was created in February 2019, updated in July 2024 with a next review date of July 2027.