

10 June 2025

FOI Ref 21204

**Request - You asked us the following:**

1. Please state how many contracts the department has signed with Pen-Link Technologies UK Ltd or its parent company Cobwebs Technologies Ltd. Please also search for "Cobwebs Technologies UK Ltd" as this is the former name of Pen-Link Technologies UK Ltd.
2. For each contract please state its
  - a. name
  - b. award date
  - c. start date
  - d. end date
  - e. financial value
3. For each contract, please also state what services are/were provided under the contract.
4. For each contract, please also state whether you have, or had, access to the product 'Webloc' under the contract.
5. For each contract, please state how it was awarded (e.g. through competitive tender, direct award, called off a framework agreement).

We received your request on 08/04/2025 and have processed this under the Freedom of Information Act (FOIA).

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

**Staffordshire Police can neither confirm nor deny whether information relevant to this request is held, as the duty in Section 1(1)(a) of the Freedom of Information Act 2000 does not apply by virtue of the following exemptions:**

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

- Section 24(2) National Security
- Section 31(3) Law Enforcement

Section 24 and Section 31 are both qualified exemptions and as such there is a requirement to evidence any harm confirmation or denial that any other information is held as well as consider the public interest.

**Harm in confirming or denying that information is held**

Any disclosure under FOI is a release to the public at large. Under the Act, we cannot, and do not request the motives of any application for information. We have no doubt that the vast majority of requests made

under the Act are legitimate and the applicants do not have any ulterior motives. Whilst not questioning the motives behind this specific request, confirming or denying that information is held regarding business with PENLINK, or any other likeminded third-party provider, would cause operational harm and affect our ability to fulfil our core function of law enforcement in the future. Confirming or denying whether or not information is held would enable individuals and organisations that are intent on causing disruption to identify strengths and weaknesses at force level, and more so nationally, which could be exploited causing harm to members of the public. This would be to the detriment of providing an efficient policing service and a failure in providing a duty of care to all members of the public.

The threat from terrorism cannot be ignored. It is generally recognised that the international security landscape is increasingly complex and unpredictable. Since 2006, the UK Government has published the threat level based upon current intelligence, and that threat is currently judged as “SUBSTANTIAL”, meaning that an attack on the UK is likely. It is well established that police forces use tactics and technology to gain intelligence in order to counteract criminal behaviour, and it has been previously documented in the media that many terrorist incidents have been thwarted due to intelligence gained by these means.

Confirming or denying whether any information is held about a contract with PENLINK and the services used would limit operational capabilities as criminals/terrorists would gain a greater understanding of the police’s methods and techniques, enabling offenders to take steps to counter them. It may also suggest the limitations of police capabilities in this area, which may further encourage criminal/terrorist activity by exposing potential vulnerabilities.

This detrimental effect is increased if the request is made to several different law enforcement bodies. In addition to the local criminal fraternity now being better informed, those intent on disrupting policing functions throughout the UK will be able to ‘map’ where the use of specific businesses, their products or certain tactics may or may not be deployed. This can be useful information to those committing (or those intent on committing or planning) crime.

Any information identifying the focus of policing activity could be used to the advantage of terrorists or criminal organisations. Information that undermines the operational integrity of these activities will adversely affect public safety and have a negative impact on both National Security and Law Enforcement.

### **Factors favouring Confirming or Denying for Section 24**

The information, if held, only relates to national security and confirming or denying whether it is held would not actually harm it. The public are entitled to know what public funds are spent on and what measures are in place. By confirming or denying if business is conducted with PENLINK, or any other likeminded third-party provider, would lead to a better informed public.

### **Factors against Confirming or Denying for Section 24**

By confirming or denying whether any information is held would render policing and security measures less effective. This would lead to the compromise of ongoing or future operations to protect the security or infra-structure of the UK and increase the risk of harm to the public.

### **Factors favouring Confirming or Denying for Section 31**

Confirming or denying whether business is conducted with PENLINK, or any other likeminded third-party provider, would provide an insight into the Police Service. This would enable the public to have a better understanding of the effectiveness of the police and about how the police gather intelligence. It would greatly assist in the quality and accuracy of public debate, which could otherwise be steeped in rumour and speculation. Where public funds are being spent, there is a public interest in accountability and justifying the use of public money.

### **Factors against Confirming or Denying for Section 31**

Confirming or denying that any information is held regarding business with PENLINK, or any other likeminded third-party provider, would have the effect of compromising law enforcement tactics. It has been recorded that FOIA releases are monitored by criminals and terrorists and so to confirm or deny information is held concerning intelligence gathering would lead to law enforcement being undermined. The Police Service is reliant upon all manner of techniques during operations and the public release of any modus operandi employed, if held, would prejudice the ability of the Police Service to perform the functions it exists to provide.

By confirming or denying that a business interest exists would hinder the prevention or detection of crime. The Police Service would not wish to reveal what tactics may or may not have been used to gain intelligence as this would clearly undermine the law enforcement and investigative process. This would impact on police resources and more crime and terrorist incidents would be committed, placing individuals at risk. It can be argued that there are significant risks associated with providing information, if held, in relation to any aspect of investigations or of any nation's security arrangements so confirming or denying that information is held, may reveal the relative vulnerability of what we may be trying to protect.

### **Balance Test**

The security of the country is of paramount importance and Staffordshire Police will not divulge whether any information is or is not held regarding business with any company, if to do so would place the safety of an individual at risk, undermine National Security or compromise law enforcement.

Whilst there is a public interest in the transparency of policing operations and providing assurance that the Staffordshire Police is appropriately and effectively engaging with the threat posed by various groups or individuals, there is a very strong public interest in safeguarding the integrity of police investigations and all areas of operations carried out by police forces throughout the UK.

As much as there is public interest in knowing that policing activity is appropriate and balanced this will only be overridden in exceptional circumstances. The use of technology can be a sensitive issue that would reveal police tactics and therefore it is our opinion that for these issues the balancing test for confirming or denying whether any information is held regarding the police, PENLINK, or any other likeminded third-party provider, is not made out.

However, this should not be taken as necessarily indicating that any information that would meet your request exists or does not exist.

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



STAFFORDSHIRE  
**POLICE**

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