



STAFFORDSHIRE  
**POLICE**

Your Ref: FOI 21390

Date: 5 June 2025

Internal Review FOI 21419 Review of FOI 21390

Dear Applicant,

**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 27<sup>th</sup> May 2025.**

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

*I am submitting this request under the Freedom of Information Act 2000 in relation to two separate police incidents recorded by Staffordshire Police. I am requesting procedural and metadata-level information only — this request does not seek full incident reports, nor any personally identifiable information about third parties.*

*This clarification is made in good faith to avoid unnecessary application of Section 40 exemptions and to support the principle of transparency in operational procedure.*

Incident 1:

- Incident Number: [REDACTED]
- Date: [REDACTED]
- Occurrence Number: [REDACTED]

Incident 2:

- Incident Number: [REDACTED]
- Date: [REDACTED]
- Occurrence Number: [REDACTED]

*Please note: Both incidents relate to the same named individuals and involve similar subject matter, but they are logged as two distinct police occurrences and are therefore being treated separately in this request.*

*I respectfully request disclosure of the following information for both incidents listed above:*

**1. Call Metadata & Origin of Report**

- The exact date and time the initial call or report was made.
- The method used to submit the report (e.g. 999, 101, online form, third-party referral).



- Whether the report was made by the named complainant directly, or on their behalf by a third party — and if so, whether this was explicitly stated or inferred.
- The originating contact method (e.g. phone number, online form submission ID).  
If full disclosure of the originating phone number is not permitted under Section 40, I request that a redacted version be provided (e.g. the last four digits) in line with ICO guidance on proportional redaction and previous FOI precedents.
- Whether the identity of the reporting party was verified by the call handler or confirmed by officers following the report.
- Whether there was any follow-up contact initiated by police with the complainant, reporting party, or any other individual — and if so, the purpose, method (e.g. telephone or in-person), and timing of that contact.

For clarity: “Call metadata” refers to technical or administrative data associated with the report — such as time of submission, channel of contact, and type of device or line used — not personal conversation content.

## 2. CAD Log Summary / Dispatch Notes

- A summary or redacted version of the CAD (Computer Aided Dispatch) log, showing:
  - o Initial call handling entries
  - o Response grading (if any)
  - o Officer deployment notes
  - o Any comments added during follow-up or closure
- Notations indicating urgency, risk level, or vulnerability if applied.

## 3. Procedural Verification

- Any record that police confirmed the identity and intent of the named complainant following the report — particularly in cases where the report was initiated by a third party.
- Whether there is a notation or log entry confirming that police spoke directly with the complainant to verify the complaint after the report was made.

**You requested an internal review see below:**

I am writing to formally request an internal review of FOI Reference 21390, as I believe the refusal under Section 40(5) of the Freedom of Information Act 2000 was incorrectly applied.

My request specifically and explicitly sought procedural and metadata-level information only — such as:

- Timestamp of call
- Contact method (e.g., 101, 999, online form)
- Whether the caller identified themselves or was verified
- Whether the report was submitted directly or by a third party (and whether this was stated or inferred)
- Originating contact method (e.g., phone line or submission ID)
- Last four digits of the originating phone number, if full disclosure is not permitted — in line with ICO guidance on proportional redaction and previous FOIA precedents

- *Follow-up actions taken by police (method, timing, and purpose)*
- *CAD log entries (initial call notes, response grading, officer deployment, comments at closure)*
- *Any internal verification record or audit log confirming the identity or intent of the named complainant*

*This request did not seek personal data, names, or private content. The information requested relates purely to the administrative handling of the incidents, not the substance of the complaints.*

*As per ICO guidance, metadata and process data is not automatically exempt simply because it relates to an incident involving individuals. Moreover:*

- *Redacted data (e.g., partial phone numbers or anonymized CAD snapshots) is routinely disclosed under FOIA.*
- *The “neither confirm nor deny” (NCND) stance appears disproportionate, especially since the existence of these incidents is not in dispute — they are known to me and were provided with verified incident numbers and dates.*

*Furthermore, ICO case law (including FS50649368 and similar rulings) supports the view that administrative and metadata-level details — such as contact timestamps, methods, and redacted origin data — can and should be disclosed under FOIA when personal identifiers are proportionally removed.*

*The use of a “Neither Confirm Nor Deny” position appears inappropriate in this context, given that I have already cited the verified incident numbers and dates, which are known to both parties and have been acknowledged in other correspondence. NCND provisions are designed for requests where the existence of a record itself is sensitive — which clearly does not apply here.*

*For further clarity, I also explicitly stated that I would accept the information in summary, redacted, or partially extracted format — including officer notes, CAD summaries, or audit trails from systems such as STORM or NICHE — provided they contained the relevant metadata and procedural indicators.*

*This request was also submitted in the context of:*

- *An ongoing Subject Access Request (SAR)*
- *A formal complaint to the Professional Standards Department*
- *Concerns about potential third-party misrepresentation and a failure to verify the identity of the reporting party*
- *My need to confirm whether police adhered to CPS guidance and statutory harassment thresholds before acting on the complaint*

*As this case involves potential third-party impersonation and false representation of a relationship dynamic, it also raises serious safeguarding concerns. If the identity of the reporting party was never verified, this not only undermines the investigation but also exposes both parties to preventable risk — especially in emotionally charged or high-conflict situations.*

*I believe the application of Section 40(5) in this case has denied me access to legitimate procedural records, which are critical to understanding how a serious and career-threatening allegation was initially recorded, verified (or not), and processed.*



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*In light of the above, I request that you reconsider the refusal, or at the very least provide:*

- *Redacted metadata and CAD log summaries*
- *An explanation of the verification process used by call handlers*
- *Clarification on whether direct contact with the complainant was confirmed post-report*
- *A redacted form of the originating phone number (e.g. final four digits) as previously requested*

*I also ask that, under Section 16 (Duty to Advise and Assist), you provide guidance on how this request could be modified to enable disclosure if any parts remain sensitive — rather than relying on a blanket exemption.*

*I further remind Staffordshire Police of its obligations under the Section 45 Code of Practice, which encourages transparency, fairness, and an effort to resolve ambiguity through dialogue — especially when requests pertain to procedural accountability and not personal or classified content.*

**Upon review of your request for information under the Freedom of Information provision referenced above and all corresponding communication, we are of the opinion that the response issued, alongside all clarification provided, fully answers the terms of your request.**

**We also confirm that the application of all exemptions outlined within the original response are fully justified, and that the explanations and rationale for their application conveyed clearly and unequivocally. Please also see the more recent decision notice from the ICO reference IC-320622-K6S9, which gives clarification surrounding the use of exemptions; [Chief Constable of North Wales Police | ICO](#)**

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  
Tel: 08456 30 60 60 or 01625 54 57 45

Yours sincerely

Central Disclosure Unit Management Team  
Staffordshire Police