

13 November 2025

FOI Ref 21974

Request - You asked us the following:

I am writing to request all written digital correspondence between (1) your force's team responsible for addressing and responding to freedom of information requests and (2) the National Police Chiefs' Council's (NPCC) central referral unit (CRU) in September 2025.

I appreciate that parts of the correspondence will need to be redacted, but would remind that redaction does not count towards the time/cost limits under s12 of the FOIA. The possibility that parts of the correspondence will need to be redacted also does not justify withholding the correspondence in its entirety.

We received your request on 16/10/2025 and have processed this under the Freedom of Information Act (FOIA).

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

Staffordshire Police holds the requested information.

- I am writing to request all written digital correspondence between (1) your force's team responsible for addressing and responding to freedom of information requests and (2) the National Police Chiefs' Council's (NPCC) central referral unit (CRU) in September 2025. – **Partially disclosed, please see the accompanying file titled 'FOI 21974 Correspondence with NPFDU Data'. Please see the below exemptions.**
- I appreciate that parts of the correspondence will need to be redacted, but would remind that redaction does not count towards the time/cost limits under s12 of the FOIA. The possibility that parts of the correspondence will need to be redacted also does not justify withholding the correspondence in its entirety.

Please be advised that we have included all emails between Staffordshire Police's (SP) FOI team and the NPCC Central Referral Unit in September 2025 whereby we have liaised with them regarding FOI requests that SP has received and then obtained advice for.

The following exemptions have 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 23(1) Information supplied by, or concerning certain security bodies
Section 23 is an absolute class-based exemption and as such does not require the application of a Public Interest Test.



- Section 31 (1)(a)(b) Law Enforcement

Information is exempt from disclosure under S31 (1)(a)(b) where the release of Information would, or would likely to, prejudice the prevention and detection of crime and/or the apprehension or prosecution of offenders. This exemption is qualified and prejudice-based and, as such, we are required to evidence the harm in disclosure and apply the public interest test.

- Section 40(2) Personal Information

Section 40(2) is an absolute exemption which means that there is no need to quantify the harm that may arise from the disclosure; neither is it subject to a public interest test.

To release personal or third-party information held by Staffordshire Police, would breach the data protection principles; namely –

- Data is lawfully and fairly processed.
- Processed in line with an individual's rights.
- Data is secure.

Personal and third-party information cannot be released under the Freedom of Information Act.

Disclosure under Freedom of Information is a release of information to the world in general and not an individual applicant.

Harm:

The Freedom of Information Act plays an important role in preventing crime, particularly through its impact on transparency, accountability and public oversight. FOI legislation allows members of the public and watchdog organisations to access records related to matters including police conduct and judicial decisions. This transparency helps expose misconduct, bias, or systematic failures, which can lead to reforms that prevent future crimes.

Accordingly, the NPFDU acts as a national coordination body in providing professional advice and support for forces and stakeholders in all matters relating to both freedom of information (FOI) and data protection (DP) within the UK police service.

In order to do this, there are established internal processes and channels by which the forces and the NPFDU maintain contact so that information, advice and support can be given without disruption. Accordingly, some of the information requested contains contact details that would, if released, provide persons intent on disrupting the work of the NPFDU with information that would assist them in this endeavour.

Public Interest Test

Factors favouring disclosure under Section 31(1)(a)(b)

Staffordshire Police is a public authority and is ultimately accountable to the general public. When any request for information is made to the police, it is important that Staffordshire Police is transparent, where possible, in responding to that request for information. Disclosing all information held without redaction, would reinforce the forces commitment to transparency with the general public.

Factors favouring non-disclosure under Section 31(1)(a)(b)

The release of the internal contact details for the NPFDU would provide persons intent on disrupting the work of the NPFDU, Staffordshire Police and the Police Service more generally, with information that would assist them to do so. By disclosing information which has the potential to result in vast amounts of correspondence being received would impede upon the resources of these members of staff and cause disruption to the work of Staffordshire Police and the NPFDU.

Balance test

Whilst there is a public interest in better informing the public as to the internal mechanisms used within the force, this must be balanced with the need to ensure that the appropriate channels are used for contact and that internal mailboxes are not compromised in any way.

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:

IAT@staffordshire.police.uk

Or by Post to:

Information Access Team
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 Information Access Team 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 a Supervisor who is independent from the original Decision Maker. The Information Access Team will set a target date for a response. The response will be made as soon as is practicable with the intention to



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complete the review within 20 working days. In more complex cases the review may take up to 40 working days.

The independent Supervisor 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 Supervisor will reply to the appellant with the result of the review. If the appellant 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 link: <https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

Freedom of Information
Information Access Team