



STAFFORDSHIRE
POLICE

Our Ref: FOI 21986
Your Ref: FOI 21907
Date: 11 November 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 01/10/2025.

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

I am writing under the Freedom of Information Act 2000 to request copies of all Staffordshire Police policies, procedures, and guidance documents relevant to the scenarios outlined below. I request all policies, procedures, and guidance currently in force.

I emphasise that I am not seeking any personal data—only documents and guidance that set out general internal practices.

For each scenario, please provide any relevant policies, procedures, or standard operating procedures currently in force. If no such guidance exists, please confirm this.

1. Attending Officers

Please provide any current guidance relating to officers attending roadside incidents, including policies on:

1.1 - Requesting personal information (such as date of birth) after it has already been verified against official identification such as a driving license.

1.2 - Collection and securing of physical evidence at incident scenes, including clothing or objects belonging to victims of assault and items that may otherwise appear insignificant, such as an empty plastic water bottle.

1.3 - Searching of suspects or vehicles when a weapon has been reported.

1.4 - Advising individuals that they will receive correspondence by post.

1.5 - Recording or closing incidents under “outcome 15,” including any requirements to note evidential difficulties, investigative steps taken, and any advice given and to whom.

1.6 - Issuing crime reference numbers for incidents recorded under “violence against the person.”

1.7 - Conducting risk assessments and safeguarding measures where individuals are left in immobilised vehicles near persons who may pose a risk.

1.8 - Handling follow-up queries from individuals after an incident, including whether officers may decline to respond, such as refusing to email back to confirm if emails have been forwarded or other straightforward messages.

2. Subject Access Requests (SAR)

Please provide any current guidance for Staffordshire Police’s SAR team, including policies on:

2.1 - The use of AI-generated transcripts for body-worn video (BWV), including how unintelligible or misattributed speech is handled.

2.2 - Redaction of officers' names in SAR disclosures where the officer voluntarily provided their name during the incident.

2.3 - Inclusion of details of victim support offered in SAR disclosures.

2.4 - Disclosure of 999 call recordings in formats that cannot be transcribed by AI systems, and whether applicants' voices are muted when overlapping with the call handler.

2.5 - Any limits on the number or frequency of SARs an applicant may submit.

3. Professional Standards Department (PSD)

Please provide any current policies, procedures, or guidance covering PSD complaint handling, including:

3.1 - Whether PSD staff may make predictions about likely court outcomes (for example, stating a case would "likely be thrown out in court").

3.2 - Any policies or guidance on whether PSD staff should have full access to the same disclosure material provided to complainants when investigating or reviewing a complaint.

3.3 - The creation of new email subject lines that break the complaint into separate threads, making it harder to track as a single, continuous matter.

3.4 - Timescales or deadlines that apply for providing updates during a complaint review.

3.5 - Standards that apply to communications with complainants, including whether there are rules about sending responses outside normal working hours (for example, late at night or on weekends).

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

I am requesting an internal review of Staffordshire Police's response to my Freedom of Information request (FOI Ref 21907, dated 16 October 2025).

Grounds for Review

1. Section 21 exemption

Section 21 was applied to question 2.5 ("Any limits on the number or frequency of SARs an applicant may submit"), referring to the Right of Access Policy. However, that policy does not answer the question asked. It only repeats the general legal rule that a request may be refused if it is "manifestly unfounded or excessive."

I was asking whether Staffordshire Police has any internal limits or frequency rules—not for a restatement of the law. If no such rule exists, that should have been stated directly under Section 1, not withheld under Section 21.

2. "No information held" statements

The claim that no information is held across most of sections 1–3 seems highly unlikely. Staffordshire Police clearly operates within written procedures and recognised standards, including:

- The College of Policing's Authorised Professional Practice (APP)
- The IOPC Statutory Guidance on police complaints
- The Code of Ethics and other national frameworks

These are policies and guidance documents that the Force must use and therefore holds for the purpose of the FOI Act, even if not created locally.

This is reinforced by correspondence sent to me by the Professional Standards Department on 24 June 2025, which explicitly refers to following “our procedures” and acting “in line with legislation, statutory guidance and the Code of Ethics.” That wording clearly shows that PSD staff follow set procedures or guidance that should fall within the scope of my request.

If Staffordshire Police relies on national guidance instead of local documents, that should have been stated and the relevant materials identified.

3. Duty to provide advice and assistance (Section 16)

The response did not meet the duty to provide reasonable advice and assistance. No references were given to any external sources that might meet the request where local policies do not exist. Providing one link to a Right of Access Policy without further explanation does not fulfil the Force’s obligation to assist the applicant in locating the information sought.

Requested outcome

I ask that the internal review:

1. Reassesses the use of Section 21 and either discloses or confirms the absence of any internal policy on SAR frequency.
2. Re-examines each “no information held” conclusion, taking into account the external or national guidance that Staffordshire Police follows.
3. Reviews whether sufficient advice and assistance were provided under Section 16.
4. If the position remains that no relevant information is held, please explain in detail what searches were conducted, which departments were contacted, and what systems or document repositories were checked.

Thank you for reviewing this matter.

Our Response

Please note that an internal review is an opportunity to review the response to the initial questions posed, not to request responses to any additional questions.

1. Reassesses the use of Section 21 and either discloses or confirms the absence of any internal policy on SAR frequency.

Our revised response - We issue a revised response of - No information held.

2. Re-examines each “no information held” conclusion, taking into account the external or national guidance that Staffordshire Police follows.

Our response remains as no information held.

3. Reviews whether sufficient advice and assistance were provided under Section 16.

Our response – Upon review, Staffordshire Police acknowledge that although no information is held locally, we could have provided the links to the external web pages that the Professional Standards Department refer to. Please see the below links:



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<https://www.policeconduct.gov.uk/publications/statutory-guidance-2020>
[The Police \(Conduct\) Regulations 2020](#)
[Police Reform Act 2002](#)

4. If the position remains that no relevant information is held, please explain in detail what searches were conducted, which departments were contacted, and what systems or document repositories were checked.

Our response – Original response upheld. An internal review is an opportunity to review the initial response provided, it does not answer any additional questions posed. However, in order to assist the following searches were carried out:

- The Staffordshire Police internal policy and procedure database was searched.
- The Professional Standards department were contacted who provided the links supplied above.
- The right of access team Supervisor was contacted.
- The Complaint and Misconduct Manager was contacted.

The FOI Act 2000 only extends to requests for recorded information. It does not require public authorities to answer questions generally; only if they already hold the answers in recorded form.

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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