



**Our Ref:** FOI 22046  
**Your Ref:** FOI 21971  
**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 15/10/2025.**

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

*I am writing to request information under the Freedom of Information Act 2000 regarding the handling of emergency (999) and non-emergency (101) calls by Staffordshire Police call handlers. This request seeks clarification of the policies, procedures, and practices that apply to calls originating from roadside incidents.*

*For clarity, I am not seeking any operationally sensitive information, but only the relevant policies, procedures, and guidance documents currently in use.*

*Specifically, I request the following information:*

### **1. Call Logging**

- 1.1. What is the standard procedure for recording 999 and 101 calls in your systems?*
- 1.2. Under what circumstances, if any, may a 999 call be reclassified as a 101 call and deleted from a caller's record? What level of authorisation is required?*
- 1.3. How does your system identify, link, and prioritise multiple 999 calls relating to the same incident to ensure that all callers are correctly recorded as having made a 999 call and associated with the same incident record?*
- 1.4. How long are call recordings retained, and what internal guidance governs these retention periods?*

### **2. Relaying Information to Attending Officers**

- 2.1. What policies and procedures govern how call handlers relay information from 999 or 101 calls to officers attending a scene?*
- 2.2. Are there any circumstances in which call handlers are permitted to withhold, omit, or delay passing critical or relevant information from a 999 call to officers attending the scene, particularly in incidents involving violence against the person? Please provide details of such circumstances, along with any related policies, guidance, or procedural documents.*
- 2.3. How is the accuracy and completeness of information relayed to attending officers monitored and audited?*

### **3. AI Transcription and Recording Format**

- 3.1. Are there any known limitations in the format or quality of 999 or 101 call recordings that make them unsuitable for AI-based transcription?*

3.2. Please provide details of any testing or evaluation by Staffordshire Police of AI transcription tools for 999 or 101 call recordings. If no formal testing or evaluation has taken place, please confirm this and explain any reasons or considerations as to why such tools may not be suitable or effective for your recordings.

3.3. Does Staffordshire Police have any policy, guidance, or criteria for manually transcribing 999 or 101 calls? If so, please provide details of the circumstances under which a manual transcription would be undertaken and any relevant guidance documents.

Please provide copies of any relevant policies, procedural documents, or guidance notes currently in use. If any part of this request is considered exempt, please cite the specific exemption under the Act and explain why it applies.

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

I am writing to request an internal review of the handling of my Freedom of Information request (Ref 21971), dated 15 October 2025, and the response issued on 31 October 2025.

My concern primarily relates to Question 2.2 of my request, which asked:

“Are there any circumstances in which call handlers are permitted to withhold, omit, or delay passing critical or relevant information from a 999 call to officers attending the scene, particularly in incidents involving violence against the person? Please provide details of such circumstances, along with any related policies, guidance, or procedural documents.”

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#### 1. Inadequate Response to Question 2.2

The response states “Partially disclosed, no. Further information has been withheld, please see the below exemption” and then applies Section 31(1)(a)(b) of the Freedom of Information Act (Law Enforcement). This does not provide a clear answer to the core of the question — namely, whether Staffordshire Police’s procedures permit call handlers to withhold or delay critical or relevant information from attending officers in any circumstance.

I did not request operational detail, dispatch codes, or sensitive tactics, only clarification of the policy position on whether information from a 999 call can lawfully or procedurally be withheld or delayed.

Providing a general statement such as

“Call handlers are required to relay all critical and relevant information to attending officers as soon as practicable, unless doing so would endanger life or officer safety,”  
would not compromise law enforcement operations and would in fact promote transparency and public trust.

The failure to confirm even this basic point leaves significant ambiguity over a matter of public safety and accountability.

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#### 2. Questionable Application of Section 31(1)(a)(b)

The cited exemption appears to have been applied in a blanket manner without demonstrating the specific prejudice that disclosure of this type of information would cause.

The ICO’s guidance on Section 31 makes clear that this exemption requires a clear and evidenced causal link between disclosure and the claimed prejudice. The generic wording used in the response (“could undermine investigations... could aid criminals”) does not meet that threshold, particularly for non-sensitive information about general communication practice between call handlers and attending officers.

Additionally, several other police forces — including West Midlands Police, Thames Valley Police, and the Metropolitan Police — have released similar high-level call-handling policies under FOI without invoking this exemption, which demonstrates that disclosure is feasible without operational risk.

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### 3. Inconsistency Between “No Information Held” and “Information Withheld”

The response alternates between stating that “no information is held” and that “further information has been withheld” under Section 31(1)(a)(b). These two positions are mutually exclusive and create confusion as to what information actually exists.

For example:

- Under Question 2.2, the response states “Partially disclosed, no. Further information has been withheld, please see the below exemption.” This clearly indicates that some information is held but has been withheld under Section 31.

- Yet, under closely related questions — such as 2.1 (“What policies and procedures govern how call handlers relay information...”) and 2.3 (“How is the accuracy and completeness of information relayed to attending officers monitored and audited?”) — the response states “No information held.”

If Staffordshire Police possesses policy or procedural documents relevant to how call handlers relay information (as implied by the application of Section 31 in 2.2), it cannot simultaneously claim that no such information is held for 2.1 and 2.3, which cover the same area of practice.

If, on the other hand, no local policy documents exist and Staffordshire Police relies solely on national guidance (for example, the College of Policing’s Contact Management Guidance or the National Contact Management Strategy), then this should be explicitly stated.

The current combination of “no information held” and “information withheld” prevents clarity about whether Staffordshire Police actually holds any recorded information in this subject area and suggests that the handling of the request may not have properly distinguished between information genuinely not held and information withheld under exemption.

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### 4. Public Interest in Clarifying Communication Practices

There is a clear public interest in confirming that information provided by members of the public to 999 call handlers is accurately and promptly relayed to attending officers, particularly in incidents involving violence or immediate risk to life. The refusal to provide even a general assurance on this point undermines transparency and confidence in emergency response processes.

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### 5. Review Request

I therefore ask that the internal review specifically reconsider:

1. Whether a clear, non-sensitive statement of Staffordshire Police’s policy position on Question 2.2 can be provided.
2. Whether Section 31(1)(a)(b) has been appropriately applied and whether a partial disclosure or redacted version of any relevant policy or guidance document could be released in the public interest.
3. The internal consistency of statements regarding “information held” versus “information withheld.”

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I look forward to the outcome of this internal review within the statutory timescale.

### **Our response**

The following exemption has been applied: Section 14(1) of the FOI Act 2000.

Section 14(1) does not oblige a public authority to comply with a request for information if the request is vexatious.

Staffordshire Police (SP) are not providing the information you have requested as SP have determined that your request is vexatious under Section 14(1) Vexatious Requests. The Information Commissioner's guidance on the subject makes it clear that Section 14(1) may be applied where a request, or its impact on a public authority, cannot be justified. The key question to consider is whether the request is likely to cause a disproportionate or unjustified level of disruption, irritation or distress based on the impact of the authority, weighed against any evidence about the purpose and value of the request. SP are also entitled to consider the context and history of the request where it is relevant.

SP is treating this internal review request as vexatious. To provide a response to questions already submitted on a previous FOI request that have been responded to and creating duplicate requests on the same topic, will cause an unjustified and disproportionate burden upon SP. This is because there have been 5 Freedom of Information requests, 3 Internal Review requests and an ICO appeal. With every FOI request submitted, an Internal Review is being requested with additional questions posed and further FOI's and Internal Reviews are being received before SP have had the opportunity to respond to the original request. There has been a pattern of overlapping and frequent requests from the applicant on varying subjects, characterised by additional emails and queries often being submitted before SP have had the opportunity to respond to the original request. This has become burdensome to the force and is detracting from the ability of SP to respond to other requesters. There has been a bombardment of correspondence on the same or comparable topics that other departments within SP are receiving via email. For the above reasons, SP have therefore concluded that your request is vexatious within the terms of Section 14(1) of the Act and SP will not be servicing the request. Moreover, please be advised that any further similar requests will also be treated as vexatious and will not receive a response.

Please be advised that all FOI requests and response letters are published on the SP 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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