



STAFFORDSHIRE
POLICE

SP Refs: 22771, 22731 and 22749
Date: 15 April 2026

IAT Management Response to the above requests

SP refer to the above requests which were expressed in the following terms:

FOI 22749 Handling of FOI Request 21573 logged 09/04/2026

Please provide the following information relating to FOI request reference 21573:

1. *All internal communications concerning:*
 - a) *the decision to apply section 14*
 - b) *the internal review decision*
2. *Any communications with external bodies (including NPCC or any associated unit) relating to:*
 - a) *the handling of this request*
 - b) *section 14*
 - c) *disclosure practices*
3. *Any internal guidance, policy or instructions relied upon in:*
 - a) *applying section 14*
 - b) *deciding not to conduct searches*
4. *Any records explaining:*
 - a) *why searches were not undertaken*
 - b) *the basis for later withdrawing section 14*
5. *Any documents relating to:*



- a) *retention policies applied to this request*
- b) *deletion processes relevant to the information requested*

Timeframe: 1 June 2023 – present or the date of the subject request where applicable

FOI 22771 of FOI 22731 logged 14/04/2026:

Thank you for providing the Email Retention Policy.

The document is helpful in understanding the general framework applied by Staffordshire Police. However, it raises a number of points of clarification which may assist in understanding how the policy operates in practice.

The policy indicates that:

- *emails are subject to a standard retention period of two years;*
- *deletion is described as an automated, continuous process; and*
- *certain business areas may be subject to extended retention periods of 7 or 18 years.*

In that context, it would be helpful to understand:

1. Application in practice

How the policy is implemented operationally, including whether deletion is strictly automatic in all cases, or whether any manual oversight or intervention exists.

2. Scope of extended retention

Which business areas are subject to the longer retention periods referenced, and whether the departments relevant to this request fall within those categories.

3. Associated procedures

The policy refers to both a Retention Schedule 2022 and an Email Retention Procedure. It would assist to understand how these documents interact and whether they provide further detail on operational handling.

4. Preservation of information

The policy refers to circumstances in which emails may be retained outside standard deletion processes. Clarification of how such decisions are made, and whether any such consideration was undertaken in this case, would be helpful.

5. Consistency over time

Previous disclosures appear to refer to email retention periods of up to seven years. It would assist to understand whether the current policy represents a change in approach, and if so, when that change took effect.

6. Policy Implementation

The policy indicates an implementation date of June 2025, with a subsequent board approval recorded in February 2026. It would therefore assist to understand what version of the policy was in effect at the time of the request, and whether the documented version reflects the operational arrangements in place at that date.

These points are raised to better understand the operation of the retention framework, rather than to revisit matters that are currently subject to ICO consideration. It is unclear what policy actually applied when it mattered

SP Response

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

The following exemption has been applied:

- Section 14(1) does not oblige a public authority to comply with a request for information if the request is vexatious.
- Section 14(2) Where a public authority has previously complied with a request for information which was made by any person, it is not obliged to comply with a subsequent or identical or substantially similar request from that person unless a reasonable interval has elapsed between compliance with the previous request and the making of the current request.

The Information Commissioner's guidance on the subject makes it clear that Section 14 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.

Since the 20/03/2024 there have been 23 requests submitted including internal reviews, in addition to this there has been 4 ICO complaints and 1 tribunal which all relate indirectly or directly to the same topic about the ABI-NPCC Data Sharing Guidance 2025 FINAL:

FOI Requests:

FOI 16554
FOI 16835 IR of 16554
FOI 16836
FOI 16884
FOI 16905 IR of 16884
FOI 17255
FOI 17206
FOI 17355
FOI 17755



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FOI 17804
FOI 17927
FOI 17985 IR of 17927
FOI 21185
FOI 21255 IR of 21185
FOI 21186
FOI 21573
FOI 21597 IR of 21573
FOI 22240
FOI 22321
FOI 22641
FOI 22731
FOI 22771 IR of 22731
FOI 22749

ICO Complaints references:

IC374481Y4H2
IC376120T1Y9
IC385180F1L9
IC405539W4V9

As above, numerous requests have been responded to all relating either indirectly or directly to the same topic. The persistence in asking further questions is now making it difficult to navigate and cross reference the requests.

The constant bombardment of requests and additional questions is causing a disproportionate and unjustified level of disruption on the department along with irritation and distress to staff members. More recently further requests are being submitted without giving SP the opportunity to answer the previous request submitted.

For the above reasons, SP have therefore concluded that your request is vexatious within the terms of Section 14(1) and Section 14(2) of the FOI Act and SP will not be servicing these requests. Moreover, please be advised that any further similar requests will also be treated as vexatious and will not receive a response.

In 2022 SP contacted the NPCC regarding the ABI agreement highlighting concerns regarding the disclosure of information to non-ABI members. SP did this in good faith to try and galvanise the NPCC into resolving the issues raised. The subsequent hounding of SP relating to this matter is causing the staff unnecessary anguish. SP will never be able to re-write a national sharing agreement in a way that would support a body which has not been taken into consideration in the writing of such an agreement hence the issues being raised in 2022.



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