



STAFFORDSHIRE
POLICE

27th August 2026

Our Ref: FOI: 23212
Your Ref: FOI: 23109

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 9th July 2026.

Staffordshire Police (SP) refers to the above request which is copied below:

1. In the following years, please provide figures for:
 - a. the number of rape cases your force investigated during 1 Jan – 31 Dec 2020, 1 Jan – 31 Dec 2021, 1 Jan – 31 Dec 2022, 1 Jan – 31 Dec 2023, 1 Jan – 31 Dec 2024, 1 Jan – 31 Dec 2025 and 1 Jan – 30 June 2026.
 - b. Please provide an ethnic and gender* breakdown of the suspect for each corresponding year in a table. When it comes to ethnicity, please make clear whether it is self-defined ethnicity or officer ethnicity. If possible, please give both sets of data [* a female may be guilty of rape if they assist a male perpetrator in an attack].
 - c. Please provide an ethnic and gender breakdown of the victims/survivors for each corresponding year in a table. When it comes to ethnicity, please make clear whether it is self-defined ethnicity or officer ethnicity. If possible, please give both sets of data.
 - d. Please provide the ages of the youngest and oldest raped for each corresponding year in a table.
 - e. Please provide figures for the number of cases which resulted in the arrests of suspects.
 - f. Please provide the outcomes of the arrests e.g., no further action, charged, sent to crown court or whichever way you record outcomes.
2. Turning to one specific group – asylum seekers. In the following years, please provide figures for:
 - a. the number of rape cases your force investigated where the suspect was an asylum seeker during the following years: 1 Jan – 31 Dec 2020, 1 Jan – 31 Dec 2021, 1 Jan – 31 Dec 2022, 1 Jan – 31 Dec 2023, 1 Jan – 31 Dec 2024, 1 Jan – 31 Dec 2025 and 1 Jan – 30 June 2026.
 - b. Please provide an ethnic and gender breakdown of the victims/survivors for each corresponding year in a table. When it comes to ethnicity, please make clear whether it is self-defined ethnicity or officer ethnicity. If possible, please give both sets of data.
 - c. Please provide the ages of the youngest and oldest raped for each corresponding year in a table.
 - d. Please provide figures for the number of cases which resulted in the arrests of suspects.
 - e. Please provide the outcomes of the arrests e.g., no further action, charged, sent to crown court or whichever way you record outcomes.
3. Still staying with asylum seekers. In the following years, please provide figures for:
 - a. the number of sexual and indecent assaults excluding rape your force investigated where the suspect was an asylum seeker during the following years: 1 Jan – 31 Dec 2020, 1 Jan – 31 Dec 2021, 1 Jan – 31 Dec 2022, 1 Jan – 31 Dec 2023, 1 Jan – 31 Dec 2024, 1 Jan – 31 Dec 2025 and 1 Jan – 30 June 2026.



- b. Please provide an ethnic and gender breakdown of the victims/survivors for each corresponding year in a table. When it comes to ethnicity, please make clear whether it is self-defined ethnicity or officer ethnicity. If possible, please give both sets of data.
- c. Please provide the ages of the youngest and oldest raped for each corresponding year in a table.
- d. Please provide figures for the number of cases which resulted in the arrests of suspects.
- e. Please provide the outcomes of the arrests e.g., no further action, charged, sent to crown court or whichever way you record outcomes.

You have requested an Internal Review which is copied below:

Thank you for your response dated 22 July 2026 to FOI Ref 23109.

I request an internal review of your decision.

I acknowledge the information you have disclosed, but I challenge the way Staffordshire Police has applied section 30(1)(a) and section 30(1)(b) of the Freedom of Information Act 2000 and the lack of sufficient explanation supporting the partial refusal.

I address each part of my request separately below.

Question 1 - Rape investigations: suspect and victim demographics, ages, arrests and outcomes

Staffordshire Police has disclosed substantial aggregated data relating to rape investigations between 2020 and 30 June 2026.

However, you have withheld elements within the tables using the statement:

“Please be advised that self-defined ethnicity has been provided. ONGOING INVESTIGATIONS WITHHELD – S30 APPLIED.”

This approach requires further explanation.

You have not identified which specific figures you have withheld.

You have not stated:

- which years contain withheld information.
- whether the withheld figures relate only to 2026 or include earlier years.
- whether the withheld information relates to ethnicity, gender, ages, arrests, outcomes or all categories.
- how many records you have removed.

You have therefore provided an incomplete dataset without allowing the requester to understand the extent or impact of the redactions.

Section 30 protects information held for the purposes of criminal investigations.

However, your response does not explain why disclosure of the withheld aggregated figures would prejudice any ongoing investigation.

The information requested does not include:



- names of suspects.
- names of victims or survivors.
- witness details.
- evidence.
- investigative tactics.
- operational policing information.

Instead, you have removed figures from aggregated tables containing thousands of records.

You have not demonstrated how these figures could identify individuals, reveal investigative activity or interfere with evidence.

You have also disclosed significant amounts of related information, including suspect ethnicity and gender breakdowns.

This raises a question about proportionality.

If aggregated demographic information does not compromise investigations, you must explain why aggregated arrest and outcome information does.

Your response also fails to distinguish between ongoing and concluded investigations.

The dataset covers more than six years.

It is unlikely that all withheld information relates to active investigations.

You have not explained whether the withheld information relates exclusively to ongoing investigations or whether it includes information relating to concluded investigations.

You should have separated live investigations from concluded cases and disclosed information where no realistic prejudice exists.

The public interest test also requires further consideration.

You recognise that disclosure would improve understanding of the investigatory process and demonstrate how public money is used.

However, you give greater weight to general risks without explaining how those risks apply to this specific statistical information.

There is a strong public interest in understanding:

- how rape investigations progress.
- how many cases result in arrests.
- what outcomes follow investigations.
- whether patterns exist across different demographic groups.

The public cannot properly scrutinise police performance if outcome data is incomplete.

I therefore request that you reconsider the application of section 30 to question 1 and provide:

- a breakdown of exactly which figures you withheld.



- the number of records affected.
- the years affected.
- a specific explanation of how disclosure of those aggregated figures would prejudice ongoing investigations.
- full disclosure of information relating to concluded investigations.

Question 2 - Rape investigations involving asylum seeker suspects

You state:

“Disclosed: Nil.”

You have therefore indicated that Staffordshire Police recorded no rape investigations involving an asylum seeker suspect during the period requested.

However, you have not explained how you reached this conclusion.

Please clarify:

- whether “asylum seeker” is a specific searchable category within your systems.
- whether officers record immigration status routinely.
- whether you obtained this information from an intelligence marker, case management system, manual review or another source.
- whether “Nil” means that no such cases existed or that your systems did not identify any cases.

This distinction is important.

If Staffordshire Police does not routinely record whether a suspect is an asylum seeker, then “Nil” may not accurately represent the number of cases.

It may simply represent the absence of recorded information.

The public interest requires clarity because the information concerns a specific group and may contribute to public debate.

The force must ensure that any disclosed figure accurately reflects recorded data rather than assumptions based on incomplete recording practices.

I therefore request that you clarify the methodology used to produce the “Nil” response.

Question 3 - Sexual and indecent assaults excluding rape involving asylum seeker suspects

You again state:

“Disclosed: Nil.”

The same concerns apply.

You have not explained whether Staffordshire Police holds a reliable recorded field identifying asylum seeker status.



Without this information, it is impossible to determine whether “Nil” reflects:

- no recorded cases.
- no cases identified after searching available systems.
- no searchable data held by the force.

Please provide:

- the definition of “asylum seeker” used.
- the systems searched.
- whether officers record this information systematically.
- whether the result represents recorded absence or absence of recorded information.

The response must distinguish between “there were no cases” and “we found no recorded cases”.

Request for internal review:

I ask that the internal review considers the following:

1. Whether section 30 has been applied proportionately to Question 1.
2. Whether Staffordshire Police has properly demonstrated prejudice arising from disclosure of aggregated statistical data i.e., whether Staffordshire Police has demonstrated that the withheld information falls within section 30(1)(a) or section 30(1)(b).
3. Whether the force has sufficiently explained the scope of the withheld information.
4. Whether the “Nil” responses in Questions 2 and 3 accurately represent recorded information.
5. Whether further disclosure or clarification can be provided.

If Staffordshire Police maintains its position, please provide a detailed explanation addressing each of these points so that I can consider whether to refer the matter further , where and how.

SP Response

Question 1

Having reviewed how Question 1 was responded to, SP now wishes to change their stance as it is accepted that s30 should not have been applied to all aspects of this question.

Please see the attached spreadsheet ‘FOI 23212 Internal Review of 23109 Rape and Sexual Assaults Data’.

The dataset is very similar to the information provided for the original FOI disclosure (23109) but to clarify:

1a. SP are now disclosing figures for all ‘live’ rape cases broken down by calendar year.

1b. SP are now providing the number of rape victims [as an aggregate total across the full 6 years] but s30 is still cited given that the disclosure of the victims’ ethnicity and gender could hinder ongoing investigations.



1c. SP are now providing the number of identified suspects [as an aggregate total across the full 6 years] but s30 is still cited given that the disclosure of the suspects' ethnicity and gender could hinder ongoing investigations.

1d. No amendment to initial disclosure.

1e. The total number of arrests broken down by calendar year now includes arrests pertaining to cases that are still 'live' (these were not included in the original disclosure).

1f. The outcome of arrests now includes arrests pertaining to 'live' cases, broken down by calendar year (these were not included in the original disclosure).

Question 2 and Question 3.

SP's revised answer to these questions is: No information held.

This is because 'asylum seeker' is not a term used in the SP crime/occurrence recording database; there is no readily retrievable way of establishing whether or not a rape or sexual assault suspect was/is an 'asylum seeker'.

With regard to Q1, SP are to some extent, still relying upon the following exemption:

Section 30(1)(a)(b) of the Freedom of Information Act 2000 has been applied to offences currently under investigation – Investigations conducted by Public Authorities.

In accordance with Section 17(1) of the Freedom of Information Act, this letter represents a refusal notice for some aspects of Question 1:

- Section 30(1)(a)(b) – Criminal Investigations

Section 30 is qualified and class based and, as such, we are required to apply the public interest test.

Public Interest Test

Factors favouring disclosure under Section 30(1)(a)(b)

Disclosure of the information would improve the public's knowledge and understanding of the investigatory process and, as all police investigations are publicly funded, would show how public funds are being spent.

Factors favouring non-disclosure under Section 30(1)(a)(b)

Disclosure of the requested information would prejudice how investigations are carried out in the future. SP is charged with enforcing the law, preventing and detecting crime and protecting the communities SP serves. Any release of information relating to ongoing investigations could prejudice and undermine those investigations. The prevention and detection of such matters could therefore be hindered and therefore risk interference with evidence, which could have detrimental impact on future investigations. In addition, the right to a fair trial could be undermined.

Balance test

Disclosure under the Freedom of Information Act is a release of information to the world in general and not an individual applicant. Having considered the public interest factors SP are required to determine whether on balance the factors favouring disclosure outweigh those which are against disclosure. It is SP's view that the factors favouring disclosure do not outweigh those which favour non-disclosure.

This data has been provided to the best of the ability of SP, subject to the limitation of current recording protocols and systems and software. Additional offences may have been recorded during these timescales but are awaiting finalisation and input onto these systems and would not be present within this dataset.

Every effort is made to ensure that the figures presented are accurate and complete. However, it is important to note that data is extracted from multiple sources, developed for specific policing purposes, for



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which data extraction methods have not been specifically designed to directly correlate with the terminology of this request. Therefore, the data presented is subject to the inaccuracies and idiosyncrasies inherent in any large-scale recording system. Consequently, care should be taken in the interpretation and presentation of this data, to not misrepresent the whole or any part of the data disclosed.

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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