



STAFFORDSHIRE
POLICE

Our Ref: FOI 23213
Your Ref: FOI 23073

Date: 25th August 2026

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 2nd July 2026.

Staffordshire Police (SP) refer to the above request which is copied below (FOI 23073):

Time periods requested:

- 1 January–31 December 2020
- 1 January–31 December 2021
- 1 January–31 December 2022
- 1 January–31 December 2023
- 1 January–31 December 2024
- 1 January–31 December 2025
- 1 January–30 June 2026

Complaints and conduct matters recorded under the Police Staff Council or Police Conduct Regulations featuring allegations of discriminatory behaviour (race).

1. Complaint volumes

For each of the above calendar years, please provide:

- The total number of complaints to your force alleging racism by members of the public about officers in your force

2. Complainant demographics

For each complaint recorded in each year, please provide the following fields (anonymised):

2a. Ethnicity of the complainant (as recorded) e.g., White, Black, Asian or whichever ethnic groups you record your data.

2b. Age of the complainant (at time of complaint). I'm happy if you put these into groups to avoid problems with GDPR e.g., 18-30; 31-50; >50.

2c. Gender of the complainant (as recorded).



3. Officer demographics

For each complaint recorded in each year, please provide:

3a. Ethnicity of the officer (as recorded – see Q2).

3b. Age of the officer (at time of incident or complaint – see Q2).

3c. Gender of the officer (as recorded).

If you think that 3b and 3c individually or combined will identify the officer, you will impose section 40(2) – personal information – exemption. To avoid that, please just answer 3a and explain why you have imposed sec 40(2).

4. Outcomes

For each complaint recorded in each year, please provide:

4a. Outcome of the complaint, including (but not limited to):

- Arrest
- Charge
- Community resolution
- No Further Action (NFA)
- Withdrawn
- Suspension
- Sacking
- Any other outcome category used by your force

5. Data format

Please make sure that you provide the data in the same format for each separate year.

- 1 January–31 December 2020
- 1 January–31 December 2021
- 1 January–31 December 2022
- 1 January–31 December 2023
- 1 January–31 December 2024
- 1 January–31 December 2025
- 1 January–30 June 2026

5a. Please provide the data in an excel spreadsheet.

5b. If it is easier for you, simply give me the raw data so I can create my own pivot tables or filter the data.



6. Please provide documents which set out equality, diversity and inclusivity policies officers are expected to follow.

7. Please provide documents which set out what EDI training officers are expected to undertake and how often they must attend sessions e.g., initial training and refreshers etc.

You have requested an Internal Review which is copied below (FOI 23213):

Thank you for your response dated 14 July 2026 to FOI Ref 23073 and for the information you have disclosed. I appreciate the time and care taken to provide the dataset and accompanying explanation.

I note your reliance on section 40(2) of the Freedom of Information Act 2000 to withhold officer demographic information, including ethnicity, age and gender.

I recognise that section 40(2) is an absolute exemption and does not require a public interest test.

However, I do not accept that the exemption applies in the manner asserted.

I requested anonymised and, where necessary, aggregated data.

Such information does not constitute personal data if it does not identify, and cannot reasonably lead to the identification of, a living individual.

Your response states that disclosure would breach the data protection principles, but it does not explain how anonymised or aggregated officer ethnicity data would create a realistic risk of identification.

Nor does it demonstrate why partial disclosure - such as aggregated ethnicity data alone - could not be provided while mitigating any such risk.

You could, for example, disclose the officer's ethnicity, without giving their age and gender thus avoiding identification.

This should have been part of your section 16 resolution duty under the FOIA.

The ICO's guidance makes clear that public authorities must show how disclosure would contravene a specific data protection principle.

To press home the point, you have not set out how disclosure of ethnicity alone would lead to identification, particularly given the volume of officers [you have about 1,990 from data on your website] in the force and the absence of any other personal identifiers makes it all but impossible to identify the officer.



The Information Commissioner's guidance makes clear that authorities must consider whether information can be anonymised before relying on section 40(2).

A blanket refusal suggests you did not consider this.

Please regard this response as my first step in challenging this part of your decision - I am asking for an internal review of deploying section 40(2).

SP Response

A review has been completed, and SP now wishes to revise their stance with regard to question 3; the s40(2) Personal Information exemption is no longer being cited.

Please see the attached spreadsheet 'FOI 23213 Internal Review of 23073 Racism Data'.

The spreadsheet still contains the complainant data that was disclosed in the original FOI response (23073) but also gives some information pertaining to the police officers as follows:

3a. Ethnicity of the officer (as recorded – see Q2).

Please see the attached spreadsheet 'FOI 23213 Internal Review of 23073 Racism Data'.

The figures have been aggregated together to reduce the likelihood of any individual being identified.

3b. Age of the officer (at time of incident or complaint – see Q2).

The age of officers is not recorded on the database used to extract the information for this FOI request.

3c. Gender of the officer (as recorded).

Please see the attached spreadsheet 'FOI 23213 Internal Review of 23073 Racism Data'.

Once again, the figures have been aggregated together to reduce the likelihood of any individual being identified.

Please note that the number of complainants is lower than the number of officers complained about. This is because one individual may complain about more than one officer.

Furthermore, the sum of officers by ethnicity is lower than the sum of officers by gender. This is how the data is recorded (see disclaimer below).

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 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.



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As a consequence, care should be taken in the interpretation and presentation of this data, so as 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/>

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