



STAFFORDSHIRE
POLICE

Our Ref: FOI 22484
Your Ref: FOI 22124
Date: 16 February 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 17/11/2025

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

I would like some information about the Police's speed camera network and how the Police currently engages with it. To assist you in your section 16 FOIA obligations, I am sharing that I am currently engaged in a public interest investigation into the proper operation of speed camera networks across the country. My interest is in the role of the Police in managing the camera network, and the information derived from it

Could you please provide me with the following - in relation to *fixed* cameras only:

(A) Governing Documents:

Copies of contractual documents that govern the relationship between the Police and (i) the physical assets of camera equipment, and (ii) the data generated by the cameras

For clarity, 'data' typically includes photographs and annual certificates of compliance, though also includes maintenance, diagnostic and failure logs for each of the camera

To assist you in answering this question, note that the Police appears to operate the camera network through a Partnership alongside other public authorities. This same FOIA request is being made to a number of Police forces across the country: so if in your particular case, there is no Partnership, then some of the following information will not be required (for example (a) below)

In similar operating structures, there are usually two main documents : (a) a Memorandum of Understanding defining roles and responsibilities between all the authorities in the Partnership (eg. local Council, any highways authorities and the Police force); and (b) a contract between the Partnership (or one of its parties, where the Police has the benefit of the commercial contract) and a third-party camera operator that supplies, maintains and calibrates the cameras

Therefore, please provide copies of the two contracts described in (a) and (b) above. I have no interest in the commercial terms, rebates, or payment terms : my interest is in the roles and responsibilities

assigned to various public authorities in the Partnership - so I will understand that if there are redactions of commercial terms, and thus there will be no issue with regards to section 43 of the FOIA

(B) General Activity of the Network:

For the year ended 31 December 2023, please provide the average number of notices of intended prosecution generated by the individual groups of cameras in a 30mph zone, 40mph zone and 60mph zone. For each of those three groups, please provide the total number of notices issued by the most active camera in that group

(C) Legal Substance of the Partnership:

With regards to the Partnership, please provide any document that describes the legal nature and personality of the Partnership. For example, I am seeking to identify whether it is a real incorporated body, an informal brand name, or any other type of operating structure. This is an entity named publicly carrying out public services functions, funded by public funds, and seemingly fully owned and controlled by public authorities. As such, I would like to know its specific legal identity (if any)

(D) Confirmation on Possession of Certain Important Information:

Please confirm whether the Police holds or has held any of the following categories of information relating to the operation and performance of fixed speed cameras. Please note that 'holding information' in the context of FOIA and UK GDPR constitutes physical possession as well as related parties holding that same information that is accessible to the Police:

1. Maintenance logs
2. Diagnostic or error logs
3. Fault histories
4. Any similar internal performance records

You do not need to provide any data itself— I am requesting only confirmation of whether such information is or was held, even if only by a specific team or third-party operator under Police oversight

****This is important information for individuals that it seeks to prosecute for speeding offences. To limit cost at this stage, I simply request a confirmation that the Police holds this information (going back any number of years) in its possession or in an accessible location****

This same request is being submitted to several Police forces in England and Wales to understand consistencies and disparities in network governance and evidential control, and understand the scope of data held by those Police forces. Also note that this is request is part of a legally-protected body of public interest work : aside from sanction under section 77 of the FOIA, withholding from or obstructing the work of the requester may invite sanction for your organisation under the Public Interest Disclosure Act 1998 given the PIDA-protected status of the requester's body of work

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

Thank you for the revised responses. However, there are still some issues to resolve:

Firstly, with regards to point (C)'s request for documents regarding roles and responsibilities in the Partnership, SP's revised response is inconsistent with proper governance. SP's response states that it is an informal arrangement with "joint working" arrangements in place. As such, the relevant teams at SP must have knowledge of what those "joint working" arrangements are. Therefore, there must be recorded information held by SP regarding those working arrangements. It is impossible for me to consider that separate public authorities are functioning in a large partnership without any documented understanding of their relationships and responsibilities. I am therefore unable to accept the revised response to (C). Please could SP reconsider its response, and either re-confirm or revise again

Secondly, there is reference made to an excel spreadsheet for the camera notice data, though the excel file appears to be missing from the 2 February email from SP. Could SP please send the relevant file

Thirdly, I am concerned that the exemptions with regards to section 31 and section 43 of the FOIA have not been properly applied. With regards to section 43 : please re-read my original request which ensures that genuinely commercially sensitive information is redacted such that section 43 no longer applies. Could you please confirm the scope of section 43's application is consistent with my original request and does not omit information that does not fall within 'commercially sensitive'. In this regard, could SP please read page 14 of the PDF provided regarding contract terms - it appears that 'Joint Schedule 4 (Commercially Sensitive Information)' is specifically identified in the contract - therefore please ensure that the scope of section 43's application is consistent with Joint Schedule 4 in the contract and is not at risk of over-reaching in its scope

In continuation of the point above, I have concerns as to why : (1) 'Background' on page 18 of the contract terms PDF has been redacted, (2) on pages 18 and 19, all 'Equipment' descriptions have been redacted; (3) on page 20 of the contract terms PDF, 'Back Office' descriptions have been redacted; (4) on page 20 of the contract terms PDF, 'Site Detail' descriptions have been redacted; (5) on page 20 of the contract terms PDF, 'Information Security' descriptions have been redacted. There is no risk of identifying specific cameras and therefore no risk to proper law enforcement activity being conducted in accordance with section 31 of the FOIA. Furthermore, these specific forms of information should be disclosable to both members of the public being prosecuted for speeding offences and the Crown Prosecution Service in accordance with the Criminal Procedure Rules and the Criminal Procedure and Investigations Act. The information that is redacted describes the informational and governance architecture from which the evidential basis (camera data) arises in past prosecutions that SP has administered. Therefore, I have serious concerns that any exemptions in regards to (1)-(5) have been inappropriately applied by SP. Could SP please reconsider its position here, and either re-confirm or revise again its response

Fourthly, with regards to (D), I am unable to accept SP's response that it does not hold this information. Please consider the ICO guidance and long-standing judgements of the judiciary that have determined

that information is considered 'held' by the a public authority if the information is held by another party for or on its behalf. SP's revised response to part (D) of the information request - as well as the contract terms PDF which states that SP is a de facto owner of the camera network and data generated by the camera network (note : its relationship with the PCC, the contracting address is SP, and SP's inclusion in the partnership noted in the contract terms) - mean that the information is being held by the camera supplier on SP's behalf, it is easily accessible, and under Tameside duties of inquiry, the police ought to be aware of this type of information given its relevant to SP's prosecution activities. Please could SP reconsider its position here, and either re-confirm or revise again its response

SP Response

Upon review of your request for information under the Freedom of Information provision, referenced above, and all corresponding communication, SP are of the opinion that the initial response issued falls short of fully answers the terms of your request.

SP do however, confirm that the application of all exemptions outlined within the initial response are fully justified, and that the explanations and rationale for their application conveyed clearly and unequivocally.

However, to address your further queries, please find below our response.

Firstly, with regards to point (C)'s request for documents regarding roles and responsibilities in the Partnership, SP's revised response is inconsistent with proper governance. SP's response states that it is an informal arrangement with "joint working" arrangements in place. As such, the relevant teams at SP must have knowledge of what those "joint working" arrangements are. Therefore, there must be recorded information held by SP regarding those working arrangements. It is impossible for me to consider that separate public authorities are functioning in a large partnership without any documented understanding of their relationships and responsibilities. I am therefore unable to accept the revised response to (C). Please could SP reconsider its response, and either re-confirm or revise again

As stated within our revised response: The partnership is an informal collaboration with longstanding joint working arrangements. No formally recorded documentation is held.

Secondly, there is reference made to an excel spreadsheet for the camera notice data, though the excel file appears to be missing from the 2 February email from SP. Could SP please send the relevant file

Having reviewed the revised disclosure documents, SP note that this data was omitted. However, this remains the same as that provided to you within our initial response. For the avoidance of doubt, please find attached a further copy of this data for reference.

Thirdly, I am concerned that the exemptions with regards to section 31 and section 43 of the FOIA have not been properly applied. With regards to section 43 : please re-read my original request which ensures that genuinely commercially sensitive information is redacted such that section 43 no longer applies. Could you please confirm the scope of section 43's application is consistent with my original request and does

not omit information that does not fall within 'commercially sensitive'. In this regard, could SP please read page 14 of the PDF provided regarding contract terms - it appears that 'Joint Schedule 4 (Commercially Sensitive Information)' is specifically identified in the contract - therefore please ensure that the scope of section 43's application is consistent with Joint Schedule 4 in the contract and is not at risk of over-reaching in its scope

Regarding the application of exemption under Section 43(2), SP note your comment, namely: 'please re-read my original request which ensures that genuinely commercially sensitive information is redacted such that section 43 no longer applies' .

To clarify, the application of such redactions triggers the requirement to cite the relevant exemption under which they have been applied and therefore necessitates the completion of the mandated public interest test.

Fourthly, with regards to (D), I am unable to accept SP's response that it does not hold this information. Please consider the ICO guidance and long-standing judgements of the judiciary that have determined that information is considered 'held' by the a public authority if the information is held by another party for or on its behalf. SP's revised response to part (D) of the information request - as well as the contract terms PDF which states that SP is a de facto owner of the camera network and data generated by the camera network (note : its relationship with the PCC, the contracting address is SP, and SP's inclusion in the partnership noted in the contract terms) - mean that the information is being held by the camera supplier on SP's behalf, it is easily accessible, and under Tameside duties of inquiry, the police ought to be aware of this type of information given its relevant to SP's prosecution activities. Please could SP reconsider its position here, and either re-confirm or revise again its response

Regarding Part D of your initial request, following review, SP agree that the initial response was incorrect and now provide the following data.

D) Please confirm whether the Police holds or has held any of the following categories of information relating to the operation and performance of fixed speed cameras. Please note that 'holding information' in the context of FOIA and UK GDPR constitutes physical possession as well as related parties holding that same information that is accessible to the Police:

1. Maintenance logs – **Not in its entirety, only some maintenance related activity is logged alongside the fault.**
2. Diagnostic or error logs - **Yes**
3. Fault histories - **Yes**
4. Any similar internal performance records - **No**

Please be advised that all FOI requests and response letters are published on the Staffordshire Police website although personal details are not included.



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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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