

Our Ref: FOI 22518
Your Ref: FOI 22428
Date: 18 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 05/01/2026.

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

Request for information relating to police attendance at abnormal load movements to and from Froghall Junction – ST10 2HA.

I am writing on behalf of Churnet Valley Railway (1992) PLC in connection with historic abnormal load movements involving the delivery and collection of railway vehicles, to and from Froghall Junction, Froghall, Staffordshire, ST10 2HA.

This request is made under the Freedom of Information Act 2000. It does not seek personal data and is not a data subject access request.

Background and purpose of this request

As part of a recent internal governance review and the preparation of our year-end accounts, we have reviewed the cumulative cost associated with police attendance for railway vehicles movements by road to and from our railway over recent years. While Staffordshire Police have at no point invoiced the railway directly, these charges have been raised to our hauliers and passed on to us.

In considering this issue, we have also taken into account correspondence provided to us in June 2024 by the force's Abnormal Load Officer, which explained the factors relied upon when determining that police escorts were required on certain routes. Those factors included vehicle dimensions and weight, route geometry, the presence of single or double solid white lines, and the absence of legal powers for hauliers or private escort vehicles to stop or direct traffic. The correspondence indicated that, in the officer's view, certain movements could not be completed lawfully without a police escort.

We fully recognise the importance of road safety and risk assessment. Our purpose in making this request is not to challenge policing decisions in principle, but to understand, for the record, the basis on which police attendance at these movements was treated as mandatory and chargeable, and whether such attendance arose from haulier requests or from operational decisions taken by the police.

Scope of this request

This request is limited as follows:

- Time period: the last three years.

- Location: movements to or from Froghall Junction, Froghall, Staffordshire, ST10 2HA.
- Load type: railway vehicles.
- Authority: records held by Staffordshire Police only.
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We are not seeking information about unrelated abnormal load movements, nor sensitive tactical or operational detail.

Information requested

For the movements and period described above, we request the following information, insofar as it is held:

- Confirmation of each occasion on which an STGO notification was received by Staffordshire Police in relation to movements to or from Froghall Junction.
- Confirmation of whether police attendance or escort was provided, or deemed necessary, for each such movement.
- Confirmation of whether police attendance was provided following:
 - a specific request made by the haulier; or
 - an operational decision taken by Staffordshire Police following receipt of the notification from the haulier.
- Where police attendance was treated as chargeable, confirmation of whether there is a record showing that the haulier stated that the movement would not proceed unless police officers were present i.e. this was requested by the haulier or whether this was in fact notified as being required by the police.
- Confirmation of whether police attendance was classified as a Special Police Service or as operational policing in each case.
- Copies of, or extracts from, any written risk assessments, decision records or internal guidance relied upon when determining that a police escort was required for these movements.
- Copies of, or extracts from, any records showing charges raised to hauliers in connection with police attendance at these movements (with personal data, vehicle registrations, routes, timings and other sensitive details redacted as necessary).

Clarification regarding escort criteria

For clarity, we also seek explanation of the following matters, which arise directly from the rationale set out in the June 2024 correspondence.

The correspondence indicates that police escorts are required because vehicles of this size cannot traverse parts of the route without crossing centre line markings or otherwise breaching road traffic legislation, and that only police officers have the legal powers to manage traffic in such circumstances. The tractor and trailer combination used for these movements remains materially the same dimensions whether travelling loaded or empty.

Accordingly, we request clarification of:

- On what basis police escorts have been required or provided when the vehicle is loaded, but not required or provided when the same vehicle travels empty; and
- Whether the determining factor in requiring a police escort is the physical dimensions of the vehicle, the presence of a load, or some other recorded criteria.

Additional contextual clarification

We also wish to place on record a further observation, which we raise neutrally and without criticism of individual officers.

On a number of occasions, police attendance at movements has appeared to involve a level of engagement beyond simply facilitating the movement itself. This has included time spent examining the tractor unit and trailer, reviewing driver and operator records, and considering the compliance of the haulier's own escort vehicles prior to the movement commencing.

We fully acknowledge that there may be lawful and appropriate reasons for such checks, and we do not assume otherwise. However, we note that this level of engagement appears to involve the exercise of general enforcement and compliance functions, rather than the provision of a narrowly defined escort service stipulated by the police. We raise this point solely because it is relevant to understanding the nature of police involvement in these movements, and whether such involvement was properly characterised as a chargeable Special Police Service or as operational policing undertaken in the public interest.

Redactions and handling

We fully accept that certain information may properly be redacted, including personal data, vehicle registrations, precise routes, timings or sensitive operational commentary. We are content for such redactions to be applied where necessary. Our interest is limited to understanding the decision-making and charging basis, rather than the tactical execution of any movement.

This request is made in good faith and in the interests of transparency, consistency and proper governance, reflecting the cumulative financial impact of these arrangements on a not-for-profit railway that relies heavily on volunteer effort and public support.

We would be grateful if you could provide the requested information within the statutory timeframe. If you consider that any part of this request requires clarification to enable compliance, please let us know.

SP further notes the refinement of the initial request as follows

To remove the sole element of the request identified as engaging section 12(1), and to enable the request to proceed in accordance with sections 1 and 16 of the Act, I therefore formally withdraw Question 1 of my original request.

Please proceed to process the refined request for the period January 2024 to January 2026 only, limited to Questions 2, 3, 4, 5, 6 and 7 as set out in my letter dated 5 January 2026.

For clarity, the refined request seeks, insofar as the information is held, confirmation of occasions on which police attendance or escort was provided or deemed necessary for railway vehicle movements to or from Froghall Junction during that period; whether such attendance arose from a request by the haulier or from an operational decision taken by Staffordshire Police; whether attendance was treated as chargeable and, if so, whether it was recorded as a Special Police Service or as operational policing; and copies of, or extracts from, any written risk assessments, decision records, internal guidance or charging records relied upon.

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

Request for Internal Review – Adequacy and Evidential Basis of FOI Response (Ref 22428)

I request an internal review of the handling of Freedom of Information Act request FOI Ref 22428.

This request for review does not seek to introduce any new or additional information requests. It concerns the adequacy, internal consistency, and evidential basis of the response provided in your letter dated 4 February 2026, particularly in relation to Questions 3, 4, 5, 6 and 7 of the refined request.

In your letter of 4 February 2026, Staffordshire Police states that, for the period January 2024 to January 2026, police escorts for abnormal load movements to or from Froghall (ST10 2HA):

- were “deemed necessary”
- were “treated as chargeable”
- were “classified as Special Police Service”

The response further distinguishes between instances where police attendance arose from:

- “a request by the haulier”, and
- “an operational decision taken by Staffordshire Police”.

These are not general observations. They are presented as factual determinations applied to individual movements on specific dates.

In order to provide answers at this level of detail, Staffordshire Police must necessarily have consulted and relied upon recorded information. The purpose of this internal review is therefore to clarify what recorded information was relied upon to reach these determinations, and whether all such information falling within the scope of the refined request has been properly identified and disclosed.

The response makes multiple movement-specific determinations, each of which necessarily implies a decision-making process supported by recorded material.

For example:

“Deemed necessary”

For an escort to be described as having been “deemed necessary”, there must have been:

- an assessment of the notified STGO movement, and
- a decision that police attendance was required.

“Treated as chargeable”

For attendance to have been “treated as chargeable”, there must have been:

- a determination that the circumstances justified charging, rather than treating the activity as ordinary operational policing.
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“Classified as Special Police Service”

For attendance to have been “classified as Special Police Service”, there must have been:

- a classification decision distinguishing the escort from non-chargeable policing functions.

“Request by the haulier” vs “operational decision”

The response also distinguishes between escorts arising from:

- a haulier request, and
- an operational decision by Staffordshire Police.

To draw this distinction, Staffordshire Police must have some recorded basis for identifying the origin of attendance in each case.

If the escort arose from “a request by the haulier”, then:

- that request must exist in some recorded form, and
- it must have been recognised and recorded as such.

If the escort arose from “an operational decision”, then:

- that decision must likewise have been taken and recorded.

The response does not identify what records were relied upon to make these distinctions.

This issue is particularly significant in the context of STGO movements.

An STGO notification is a statutory notification of an intended abnormal load movement. It is not, of itself, a request for police services.

Movements notified under the Road Vehicles (Authorisation of Special Types) (General) Order 2003 are authorised by law subject to compliance with the conditions of that Order and to traffic management by the relevant authorities.

An STGO notification does not, of itself, request or imply a request for a police escort.

Your response, and earlier correspondence, indicate that escorts are required where vehicles must interact with traffic in ways not possible for standard vehicles, such as encroaching over centre line markings, traversing constrained rural routes, or navigating infrastructure restrictions.

Such circumstances are inherent in the movement of STGO-authorised vehicles on the public highway.

Where police attendance is required to manage traffic so that a lawful STGO movement can proceed safely, that attendance arises from necessity and constitutes operational policing rather than an optional service requested for convenience.

Against that background, the assertion that attendance in some cases arose from “a request by the haulier” raises further questions which the response does not address.

Abnormal load movements to and from Froghall are long-established operations undertaken by experienced hauliers travelling substantial distances across multiple police force areas.

These movements routinely proceed without police escorts outside Staffordshire, relying on the STGO framework and private escort arrangements where appropriate.

In those circumstances, it is not immediately apparent why a haulier would independently request a police escort only upon entering Staffordshire, particularly where such an escort would introduce delay, impose scheduling constraints, and reduce operational efficiency.

If Staffordshire Police is recording attendance as arising from a haulier request in such cases, this implies the existence of a process by which:

- hauliers request police escorts for discrete sections of an otherwise lawful journey,
- such requests are assessed and accepted, and
- the origin of attendance is recorded as haulier-requested rather than police-initiated.

The response does not explain whether such a process exists or what recorded information underpins the classification applied.

Questions 3–7 of the refined request were expressly directed at understanding these matters by reference to recorded decisions, guidance, risk assessments, charging records, classification records, or other documentation relied upon when determining escort necessity, chargeable status, and Special Police Service classification.

While the response provides conclusions, it does not identify the recorded material on which those conclusions were based.

It also appears that Staffordshire Police may be relying, at least in part, on section 21(1) of the Freedom of Information Act 2000 on the basis that escort criteria or dimensional thresholds are reasonably accessible by other means.

However, the refined request does not seek only to establish what general criteria may exist.

Questions 3–7 seek to understand what recorded information was relied upon to determine, for the specific movements identified in your response:

- that an escort was necessary,
- that attendance was chargeable, and
- that it was properly classified as Special Police Service.

Even where general escort criteria may be publicly available, the application of those criteria to a particular STGO movement necessarily involves an assessment and determination that one or more criteria have been met.

The records evidencing that assessment, identifying which criterion was engaged, and recording the resulting classification and charging decision are not made reasonably accessible by the publication of general threshold information.

Accordingly, reliance on section 21 cannot properly extend to movement-specific decision-making records or to the process by which an STGO notification is converted into a chargeable Special Police Service escort.

This is not an abstract concern.

- Charges have been raised and invoices issued for specific movements.
- Distinctions have been drawn between haulier-requested attendance and operational decisions.
- Basic principles of accountability require that such actions are supported by recorded information.

The response itself demonstrates that Staffordshire Police was able to identify dates, outcomes, classifications and charges, which strongly suggests that recorded material was consulted in order to generate the response.

If Staffordshire Police holds recorded information which was relied upon to:

- determine that an escort was necessary,
- distinguish between haulier requests and police decisions,
- classify attendance as Special Police Service, and
- raise and attribute charges to individual movements,
- then that information falls squarely within the scope of the refined request and has not been disclosed.

If it is asserted that no such information is held, the internal review is requested to consider how the determinations and distinctions described in the response were made and evidenced.

Accordingly, I consider that the response does not fully comply with section 1(1) of the Freedom of Information Act 2000, in that it does not adequately confirm or deny whether recorded information is held explaining the decision-making and classification outcomes set out in the response dated 4 February 2026.

I request that the internal review addresses what recorded information was relied upon to answer Questions 3–7 of the refined request, and whether all information falling within the scope of those questions has been properly identified and disclosed.

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 response issued, alongside all clarification provided, fully answers the terms of your request.

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

However, in order to clarify our stance please see below.

With regard to Questions 3 -7 we note your question ‘I request that the internal review addresses what recorded information was relied upon to answer Questions 3–7 of the refined request, and whether all information falling within the scope of those questions has been properly identified and disclosed.’

Please find below our assessment of the initial response:

Question 3 merely requests confirmation whether police attendance was provided and whether this was based on a specific request by the haulier or an operational decision by SP – This data was partially provided, with 3 of the incidents having no past correspondence from which this could be determined. SP deems this question to have been addressed satisfactorily as confirmation has been provided.

Question 4 requests ‘where police attendance was treated as chargeable’, confirmation of whether a record exists stating if the haulage would not proceed unless officers were present.

SP confirmed that all incidents identified were chargeable; however, no further information was held from which we could determine whether the haulage would or would not proceed if officers were not present. SP deems this question to have been addressed satisfactorily as confirmation has been provided.

Question 5 asks for confirmation of whether police attendance was classified as a Special Police Service or Operational Policing – this question was answered and confirmation provided, stating that all 6 incidents were classified as Special Police Service – SP therefore deems this question to have been addressed satisfactorily as confirmation has been provided.

Question 6 asked for copies or extracts from any written risk assessments or decision records, to which a 'No Information Held' response was provided.

Following review of the information provided by the data holder in relation to this question, we can confirm that no recorded data is held; however, to clarify, risk assessments are carried out dynamically upon receipt of details of the intended load and rout.

Question 7 asks for copies or extracts from any records showing charges raised to hauliers in connection with police attendance.

Extracts were provided showing costings, where held. Where these were not held, explanation was provided. – SP therefore deems this question to have been addressed satisfactorily as costings have been provided, where held.

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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