

13 January 2026

FOI Ref 22124

Request - You asked us the following:

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

Staffordshire Police (SP) received your request on 17/11/2025 and have processed this under the Freedom of Information Act (FOIA).

SP's response to your enquiry is as follows:

SP holds some of the requested information.

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
- Partially disclosed, please see the accompanying file titled 'FOI 22124 Speed Camera Network Documents.pdf'. Please see the below exemptions.
- (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
- Disclosed, please see the accompanying file titled 'FOI 22124 Speed Camera Network Data.xlsx'.



- (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)
- No information held.
- (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**- No information held.**

Please be advised that we have answered this request under the Freedom of Information Act.

Please note that this data has been provided to the best of the ability of SP, subject to the limitation of current recording protocols and systems/software. Additional speeding 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 data presented is accurate and complete. However, it is important to note that this has been 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.

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 Freedom of Information request responses are published on the SP website although personal details are not included.

The following exemptions have been applied:

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

- Section 31 (1)(a)(b) Law Enforcement
Information is exempt from disclosure under S31 (1) (a) (b) where the release of Information would, or would likely to, prejudice the prevention and detection of crime and/or the apprehension or prosecution of

offenders. This exemption is qualified and prejudice-based and, as such, we are required to evidence the harm in disclosure and apply the public interest test.

- **Section 40(2) Personal Information**

Section 40(2) is an absolute exemption which means that there is no need to quantify the harm that may arise from the disclosure; neither is it subject to a public interest test.

To release personal or third-party information held by SP, would breach the data protection principles; namely –

- Data is lawfully and fairly processed.
- Processed in line with an individual's rights.
- Data is secure.

Personal and third-party information cannot be released under the Freedom of Information Act.

Disclosure under Freedom of Information is a release of information to the world in general and not an individual applicant.

- **Section 43(2) Commercial Interests**

This is a prejudice based qualified exemption which means there is a requirement to provide evidence of harm and a public interest test needs to be considered.

Harm:

The presence of speed cameras in Staffordshire has significantly improved road safety. However, releasing information regarding speed camera volumes and whether they are operational would trigger the law enforcement exemption and would effectively disclose operational details about SP's use of resources to address speeding offences. Such disclosure could reveal camera deployment patterns and monitoring capabilities, which may undermine enforcement strategies. The release of such information would identify camera activity and with it any perceived abilities to monitor such offences. To disclose the exempt information would cause harm to the Police service's ability to protect the public it serves and could prejudice its ability to perform the core function of the prevention and detection of crime.

The information requested relating to the safety camera equipment companies used by SP, if released into the public domain, would harm SP's negotiating position with regards to future contracts for equipment or services. There are commercially confidential clauses within these contracts that are not permitted to be shared to the wider public.

Public Interest Test

Factors favouring disclosure under Section 31(1)(a)(b)

To disclose this information would adhere to the basic principle of being open and transparent, it would also lead to a better public awareness of the workings of the police force and the communications used with operations and during routine policing. The public are entitled to know how the use of speed cameras can influence drivers using the road. Disclosure of the information would show that SP support

transparency and accountability, also showing that appropriate measures are being taken to improve public safety and reduce offending.

Factors favouring non-disclosure under Section 31(1)(a)(b)

Fixed, mobile and average-speed cameras are used to protect the communities we serve and deter motorists from exceeding the speed limit. Disclosure of the requested information would place information into the public domain which would allow individuals to take action to frustrate the operational tactics employed to enforce road traffic law; therefore, undermining the police's key function of preventing and detecting crime. Disclosure may give the public a perception that it would be safe or permissible to drive at a certain speed, above the maximum limit, without fear of prosecution and would therefore place individuals at an increased risk of serious harm and reduce overall road safety. The primary functions of SP are preventing and detecting crime and protecting the communities we serve, disclosure of any information that would therefore interfere with these functions or place individuals at an increased risk of harm would not be countenanced.

Factors favouring disclosure under Section 43(2)

Disclosure of the requested information would allow the public to be aware of how public funds are spent or allocated and thereby would provide transparency and accountability, showing that funds from the public purse are used appropriately and proportionally.

Factors favouring non-disclosure under Section 43(2)

Through disclosure of the requested information, SP would find that its negotiating position would be greatly impaired through the release of details that would not only likely be prejudicial to SP but also to the agencies/companies involved. Releasing this information would be expected to have a detrimental effect on their ability to be competitive in the future and would be exceedingly likely to deter further enterprises submitting offers for tender in the future. This then would impede SP obtaining the most competitive or appropriate services in the future and negatively impact upon the public purse.

Balance test

It is the responsibility of SP, when dealing with commercial businesses, to not only protect their commercial interest but also that of SP. Commercial interests must be protected so that the best possible value for money is obtained through open competition, both for businesses and SP. This would not be achieved if full details were to be made available to the market. Although the use of public funds must be open and transparent, SP is accountable for the money that it spends and utilises and if to release the information means the force is unable to negotiate future tendering and have the ability to secure value for money due to business relationships having been impaired, then this would not be in the public interest.

When considering whether disclosure is appropriate, we must weigh the strongest reason for disclosure against the strongest reasons for non-disclosure. In this case, whilst the factors favouring disclosure are important in that it would adhere to the basic principle of being open and transparent, we believe when weighed against the risk of disclosure undermining our ability to prevent and detect crime and hindering our ability to protect the public, then non-disclosure takes precedence.



STAFFORDSHIRE
POLICE

Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

Any person who has requested information from SP, which has been dealt with under the Freedom of Information Act, is entitled to complain and request an internal review, if they are dissatisfied with the response they received.

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing within two months of the date of receipt of this email, and should be addressed to:

IAT@staffordshire.police.uk

Or by Post to:

Information Access Team
Staffordshire Police HQ
PO Box 3167
Stafford
ST16 9JZ

The reference number, date of the request and details of why the review is being requested must be included. Requests for review should be brought to the attention of the Information Access Team within two months of the SP response to the original FOI request.

3. Review Procedure

Receipt of a request for review will be acknowledged in writing. The review will be conducted by a supervisor who is independent from the original Decision Maker. The Information Access Team will set a target date for a response. The response will be made as soon as is practicable with the intention to complete the review within twenty working days. In more complex cases the review may take up to forty working days.

The independent supervisor will conduct a review of the handling of the request for information and of decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case, considering the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the independent supervisor will reply to the appellant with the result of the review. If the appellant is still dissatisfied following the review they should contact the Information Commissioner to make an appeal. The Information Commissioner can be contacted via the following link: <https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

Freedom of Information
Information Access Team