



STAFFORDSHIRE
POLICE

Our Ref: FOI 23001
Your Ref: FOI 22978
Date: 12 June 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 8th June 2026.

Staffordshire Police (SP) refer to the above request which was expressed in the following terms:

Following Staffordshire Police's public statement of 12 August 2025 regarding former officer Owen Mills, in which the force stated that:

"Extensive training has been delivered to all officers on the importance of maintaining professional boundaries and recognising improper relationships",

and in light of other recent misconduct cases involving Staffordshire Police officers, including former PC David Henzell, which have generated public interest in the force's efforts to prevent misconduct and maintain professional standards, I request the following recorded information.

1. Please provide recorded information describing any training, guidance, awareness campaigns, policies, procedures, or other measures introduced, enhanced, reviewed, or delivered by Staffordshire Police since 1 January 2023 relating to:

- * professional boundaries;
- * improper relationships;
- * abuse of position for a sexual purpose; and
- * sexual misconduct by officers or staff.

2. Please provide copies of, or details from, any reports, audits, reviews, evaluations, assessments, lessons-learned documents, or similar recorded information held by the force that consider the effectiveness of the measures referred to in Question 1.

3. Please provide any recorded key performance indicators, outcome measures, audit findings, survey results, monitoring data, or other metrics used by Staffordshire Police to assess the effectiveness of these measures.

4. Please provide the percentage of officers and staff who completed any force-wide training relating to professional boundaries, improper relationships, abuse of position for a sexual purpose, or sexual misconduct during the period from 1 January 2023 to the date of this request.

5. Please state whether Staffordshire Police has conducted any formal review, evaluation, or lessons-learned exercise since 1 January 2023 concerning the effectiveness of these measures. If so, please provide copies of the findings, executive summaries, recommendations, or action plans arising from those reviews.

Where information is held within reports, audits, reviews, briefing papers, presentations, or similar documents, please provide copies where possible.

I am not requesting personal data relating to any identifiable individual.

This request is made in the public interest. Staffordshire Police has publicly stated that training and reporting mechanisms have been implemented to address improper relationships and related misconduct. Disclosure would assist public understanding of what measures have been taken, whether the force has evaluated their effectiveness, and what evidence is held regarding their impact.

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

I am writing to request an internal review of Staffordshire Police's decision to refuse my Freedom of Information request (FOI Ref 22978) under section 14(1) of the Freedom of Information Act 2000.

I do not believe Staffordshire Police has demonstrated that section 14(1) applies to this request. The refusal notice does not adequately explain why the request is vexatious when considered against the Information Commissioner's guidance, the purpose of the Act, and the significant public interest in the information sought.

My request concerns measures taken by Staffordshire Police to prevent misconduct, including professional boundaries, improper relationships, abuse of position for a sexual purpose, and sexual misconduct by officers and staff. These matters are of significant public importance and directly affect public confidence in policing, accountability, and professional standards.

The request was prompted in part by Staffordshire Police's public statement of 12 August 2025 that:

"Extensive training has been delivered to all officers on the importance of maintaining professional boundaries and recognising improper relationships."

Where a police force publicly states that extensive training has been delivered to address serious misconduct risks, it is entirely reasonable for members of the public to seek recorded information regarding what training was delivered, how it was implemented, whether it has been evaluated, and what evidence the force holds regarding its effectiveness.

The purpose of my request was to understand what measures have been introduced, how they have been assessed, and what evidence Staffordshire Police holds regarding their effectiveness. The request therefore has a clear and legitimate purpose and cannot reasonably be characterised as lacking value.

The refusal notice relies heavily upon my previous engagement with Staffordshire Police, including earlier Freedom of Information requests, requests for internal review, and complaints made to the Information Commissioner's Office. However, these are rights provided under the Freedom of Information Act and associated regulatory framework. The exercise of those rights cannot, by itself, justify a finding that a subsequent request is vexatious.

The refusal notice does not identify any abusive, threatening, offensive, harassing, or improper conduct on my part. Throughout my correspondence with Staffordshire Police, I have communicated in a polite,

respectful, and professional manner. I have not used inappropriate language, nor have I engaged in conduct that could reasonably be described as harassment of staff.

The refusal notice makes assertions regarding burden, disruption, and distress, but provides little evidence to support those assertions in relation to this specific request. No information is provided regarding the volume of information involved, the work required to locate and retrieve it, or why compliance would impose a disproportionate burden when weighed against the substantial public value of the information sought.

I ask the reviewer to consider:

Whether sufficient weight was given to the significant public interest and public value of the request.

Whether excessive weight was placed on requester history, including the exercise of statutory rights to seek internal reviews and complain to the Information Commissioner, rather than on the merits and impact of the request itself.

Whether Staffordshire Police has demonstrated, with sufficient evidence, that compliance with this specific request would impose a disproportionate or unjustified burden.

Whether the refusal notice adequately explains how the balance between the purpose and value of the request and the alleged burden on the authority was assessed.

Whether section 14(1) has been applied consistently with the Information Commissioner's guidance on vexatious requests.

I ask that the refusal be overturned and that the requested information be disclosed.

If the reviewer considers any element of the request to be problematic, I ask that consideration be given to partial disclosure, narrowing the scope through advice and assistance, or identifying specific aspects that may be addressed without disproportionate burden rather than maintaining a blanket refusal.

Should the internal review uphold the refusal, I would be grateful for a detailed explanation of the factors relied upon in concluding that the public value of the request is outweighed by the burden of compliance.

SP Response

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

We also confirm that the application of the exemption outlined within this response is fully justified, and that the explanation and rationale for its application conveyed clearly and unequivocally.

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/>

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