Our Ref: 23588
Your Ref: 23494
Date: 5th November 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 7th October 2026.

Staffordshire Police (SP) refer to the above request which is copied below:
Staffordshire Police has publicly stated that extensive training has been delivered to officers concerning professional boundaries and recognising improper relationships. I understand that this includes the force's "Know Your Line" training/materials.

I am seeking recorded information specifically relating to the "Know Your Line" training, rather than a general request for all policies or material concerning sexual misconduct.

Please provide:

The date on which the current "Know Your Line" training was introduced or last substantially revised by Staffordshire Police.

The stated learning objectives or learning outcomes for the current "Know Your Line" training.

The categories of staff or officers required to complete the training, and whether completion is mandatory.

The number and percentage of officers and staff required to complete the training who had completed it as at the most recent recorded date.

Any recorded information showing how Staffordshire Police monitors completion of the training, including any completion reports, dashboards, statistics or similar recorded information, where held.

Any recorded evaluation, review, assessment or lessons-learned document concerning the effectiveness of the "Know Your Line" training, where such information is held.

If the full training material itself is held but cannot be disclosed in full, please provide any releasable version, summary, learning objectives, contents, slides or other recorded information describing what the training covers, with any exempt information redacted where appropriate.

For clarity, I am not requesting personal information concerning individual officers or staff.

Context

This request has a legitimate public-interest purpose. Staffordshire Police has publicly stated that extensive training has been delivered concerning professional boundaries and recognising improper relationships. The purpose of this request is to understand what that training consists of, who is required to undertake it, how completion is monitored, and whether the force has evaluated its effectiveness.

You have requested an Internal Review which is copied below:
FOI reference: 23494
Date of original request: 7 October 2026
Date of response: 20 October 2026
Subject: Know the Line Phase 3 training
I am writing to request a formal internal review of Staffordshire Police's response dated 20 October 2026 to my Freedom of Information request referenced above.
This is a request for an internal review of the existing FOI decision, in accordance with Staffordshire Police's published internal review procedure. I am not submitting a new information request.
I appreciate the information disclosed. However, I would be grateful if an independent reviewer could reconsider the following two aspects of the response.
1. Application of Section 12 of the Freedom of Information Act 2000
My original request expressly asked for any releasable version, summary, learning objectives, contents, slides or other recorded information describing the training, with exempt information redacted where appropriate.
The response states that the full training material cannot be provided because Section 12 applies. However, the response does not explain the basis on which the cost limit was assessed or whether further partial disclosure could be achieved within that limit.
I recognise that Section 12 may apply where the estimated cost of complying with a request exceeds the statutory limit. Nevertheless, I ask the reviewer to reconsider whether further existing recorded information could be disclosed without exceeding that limit.
In particular, please consider whether discrete or readily accessible materials, such as presentation slides, handouts, contents pages or other recorded information describing the training, could be disclosed separately.
I would also appreciate clarification of the basis for applying Section 12, including the nature of the cost assessment and whether the possibility of partial disclosure was considered.
I am not insisting on disclosure of the entire training package if the statutory cost limit genuinely prevents this. I am asking that the decision be reviewed and that any additional information which can reasonably be disclosed within the limit be considered for release.
2. Clarification of the training completion figures
My original request asked for the number and percentage of officers and staff required to complete the training who had completed it as at the most recent recorded date.
The response states that 1,283 officers and staff have received the revised training, representing 32% of the force. It also explains that some individuals may have received the training more than once.
I would be grateful if the reviewer could clarify the figures provided so that it is clear how they answer my original question.
Specifically, please confirm:
- The date to which the reported figures relate.
- Whether the figure of 1,283 represents unique individuals who have received the revised Phase 3 training, rather than total training attendances.
- Whether the 32% figure represents the proportion of the workforce required to complete the training who have received the revised Phase 3 training, calculated using unique individuals.

If these figures are not held in precisely this form, I would appreciate disclosure of any existing recorded figures that most closely answer my original question, together with clarification of what they represent.I understand that the Freedom of Information Act does not generally require

an authority to create new information that it does not hold. My request is for clarification and disclosure of relevant recorded information where held.
Requested outcome
I respectfully ask the independent reviewer to:
1. Reconsider the application of Section 12 and whether further existing training materials can be disclosed without exceeding the statutory cost limit.
2. Clarify the basis for applying Section 12 and whether partial disclosure was considered.
3. Clarify the training completion figures, including the reporting date and whether the figures represent unique individuals who received the revised Phase 3 training.
Please confirm receipt of this internal review request and provide the outcome in writing, including the reasons for any decisions reached.

SP Response

1. Reconsider the application of Section 12 and whether further existing training materials can be disclosed without exceeding the statutory cost limit.
   Section 12 was not cited as an exemption in FOI response 23494.

2. Clarify the basis for applying Section 12 and whether partial disclosure was considered.
   Section 12 was not cited as an exemption in FOI response 23494.

3. Clarify the training completion figures, including the reporting date and whether the figures represent unique individuals who received the revised Phase 3 training.
   The response letter clearly stated that 1,283 individual officers had received the training. It is not clear what you mean by 'reporting date' but the figures were provided to the FOI team on 14th October 2026

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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