



STAFFORDSHIRE
POLICE

Our Ref: 23535

Your Ref: 23475

Date: 15th October 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 2nd October 2026 which is copied below:

Please provide the annual total number of incidents of excess speed recorded by either fixed or mobile speed camera equipment for the years 2023, 2024, 2025 and 2026 for the stretch of the A513 between the junction of A513/A34 (Weeping Cross) and A513/Brocton Road (Milford Common), Stafford.

I do not need to know specific dates, times or speed of incidents, simply an annual total for each year.

You have requested the below Internal Review which SP received on 13th October 2026.

Complaint and request for review of decision not to disclose information requested under the Freedom of Information Act

Your reference 23475

Background

The above relates to a request for information made to Staffordshire Police on 2nd October 2026 under the provisions of the Freedom of Information Act. The request was for the provision of annual totals of excess speed incidents recorded using fixed or mobile speed camera equipment along a stretch of the A513 road between the junction of A513/A34 (Weeping Cross) and A513/Brocton Road (Milford Common), Stafford for the years 2023, 2024, 2025 and 2026.

Information was disclosed by Staffordshire Police, in part, where this related to mobile speed camera equipment but withheld insofar as the information related to fixed speed camera equipment.

The response received from Staffordshire Police (SP) stated:

SP can neither confirm nor deny whether further information relevant to this request is held, as the duty in Section 1(1)(a) of the Freedom of Information Act 2000 does not apply by virtue of the following exemptions:

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(3) – Law Enforcement.*
- *Section 38(2) – Health & Safety*

Staffordshire Police outlined 'harm' that, it determined, may result from disclosure as:

SP neither confirms nor denies whether information relating to the operational status or activity of individual fixed cameras is held. Safety cameras are not always active, and the police rely on the perception of



drivers that camera housings could be active and would therefore adjust their speed so as not to contract a fine. To confirm whether information is held in respect of this request in relation to fixed cameras would diminish the effectiveness of safety cameras in the SP area and undermine police enforcement. To confirm or deny that information is held could have a detrimental impact on how motorists drive, which would lead to an increase in offending and road traffic collisions; therefore, placing the public at a greater risk of harm.

Staffordshire Police cite factors tending towards a public interest decision not to confirm or deny that information is held (Section 31(3)) as:

Any release of information under the FOI Act is a disclosure to the world, not just to an individual applicant. Safety cameras are used to protect the community that we serve and deter motorists from exceeding the speed limit. Confirmation or denial that information is held would allow the public to take action to frustrate the operational tactics adopted to enforce road traffic law and this would undermine the police's key function of preventing and detecting crime. This may also encourage motorists to fail to adhere to the speed limit and would put lives at risk. Confirmation or denial that information is held would, or would be likely to, prejudice substantially the apprehension or prosecution of offenders and interfere with law enforcement. Therefore, this could lead to an increase in road traffic collisions.

Staffordshire Police further cite factors tending towards a public interest decision not to confirm or deny that information is held (Section 38(2)) as:

Confirmation or denial that information is held in respect of this request would enable individuals to evade enforcement. This may encourage non-compliance with speed limits and increase the risk of collisions. If drivers adapt their behaviours solely to avoid detection at specific points, this could undermine the deterrent effect of the cameras and increase speeds in surrounding areas, posing a risk to pedestrians, cyclists and other road users.

Whilst not explicitly referenced in its response to this Freedom of Information request, Staffordshire Police have previously (Internal review 23410 of FOI 23293) relied upon guidance issued by the National Police Chiefs' Council (NPCC) in order to refuse the disclosure of similar information. The NPCC guidance, issued on 13th February 2026, states:

Where only 1 camera (or 1 single stretch of road with a single set of variable speed cameras covering it) is identified in the request, then an NCND s31(3) and s38(2) is advised. The harm identified is:

- a) The risk of identifying where that camera (or stretch of road in the case of variable cameras) may have been inactive for the period covered by the request due to a NIH response.*
- b) The risk of any disclosure adding to a mosaic picture of safety camera operational status: - a pattern of activation. Most commonly, this risk exists due to the possibility of repeat requests about the same camera (different periods of time), or similar requests made for a different camera, for the same period. The cumulative effect of multiple, mixed responses is identification of low-level operational status of individual cameras which ultimately undermines the law enforcement purpose of the safety camera network.*

Grounds for Complaint/Request for Review of the Decision

Dealing first directly with the request for information; The information requested is for purely historical, macro level annualised figures and not granular, day by day or hour by hour logs of recorded incidents of excess speed.

Whilst the information requested does relate to a single stretch of road on which only one fixed camera site is located, an annual total of activations reflects a significant sample size from which granular detail cannot be extrapolated. The disclosure of information, as requested, would give absolutely no indication



to a motorist on any given day, or for any given period, whether the camera is, or was, active or simply acting as a deterrent through its mere presence. The 'deterrent effect' of the camera remains intact because any driver approaching the camera has no idea if it is active or not.

In support of this argument, on 19th August 2019, the Information Commissioners Office (ICO) considered a complaint made following a decision by The Chief Constable of Surrey Police not to disclose information relating to speed enforcement along a stretch of the M23 motorway, where the speed was restricted, due to roadworks, to 50mph (FS50831062).

Information requested was for the total number of speeding offences along that stretch of the M23 since the commencement of the roadworks. This period of the roadworks, and therefore, the information requested, amounted to a period of four and a half months.

Surrey Police relied on broadly identical grounds to those which Staffordshire Police now rely in refusing to disclose the requested information.

The ICO directed that Surrey Police should disclose the information requested and concluded that:

The figure [information requested on speeding offences] is a single figure spanning a time period of four and a half months and it would not be possible to identify any patterns of camera use over that time period, such as times of the day or days of the week when it has been in operation. It would only show that there have been a number of offences detected on the M23 scheme and disclosure of the figure in itself may actually deter potential road users from speeding (para.32, ICO Decision FS50831062).

The information requested from Staffordshire Police under FOI 23475 relates to a significantly longer period of time than the request made to Surrey Police and with only annualised figures being requested. It follows that the decision and rationale given by the ICO in the Surrey Police case also stands in this Staffordshire Police case.

In relation to the NPCC guidance issued to police forces on 13th February 2026, two potential harms factors are identified. The first, that disclosure would identify whether a particular camera site is, or has been, active or not over the period of the request. This is effectively dealt with by requesting only a macro annualised number of offences with no granular detail be provided and that the data is historic rather than any request for future operational detail. This is in line with the direction made by the ICO in the Surrey Police case (ICO Decision FS50831062).

The second point advanced in the NPCC guidance is that disclosure could add 'to a mosaic picture of safety camera operational status'. The particular use of the word 'mosaic' in the guidance strongly suggests the building of a granular, detailed picture of the operational status of a road safety camera or cameras. Since the request here is for only a single annualised figure, it is difficult to see how the provision of this information could add to a mosaic picture of any safety camera operational status.

In fact, the original request to Staffordshire Police for information (FOI 23475) went further to prevent the building of any picture of operational deployment by seeking only an 'annual total number of incidents of excess speed recorded by either fixed or mobile speed camera equipment'. The request specifically and deliberately did not request any breakdown of figures across fixed and mobile speed camera equipment. Staffordshire Police should, therefore, have provided a single aggregated annual number of incidents without breaking down those incidents into ones recorded by fixed and those recorded by mobile camera equipment.

Staffordshire Police' position, in neither confirming or denying whether information relating to the operational status or activity of individual fixed cameras is held is, quite frankly, ridiculous. It is widely and publicly known that individual speed camera equipment is not always active. In fact, Staffordshire Police confirm this position in its response notice to the FOI information request.



In its determination of 'harm', Staffordshire Police claim that:

'To confirm or deny that information is held could have a detrimental impact on how motorists drive, which would lead to an increase in offending and road traffic collisions'

The ICO reach an entirely different view about the publication of information relating to motorists speeding on a particular section of road, whereby:

'disclosure of the figure [total number of speeding offences at a particular location] in itself may actually deter potential road users from speeding' (para.32, ICO Decision FS50831062)

Making information public in respect of speed enforcement activity is, in my view, more likely to reduce the number of offences as drivers become more 'speed aware' in the knowledge that fixed speed camera sites may be active and that they risk prosecution where they drive above the speed limit. The release of this information could, therefore, have a positive health and safety impact rather than the negative impact advanced by Staffordshire Police.

In fact, Staffordshire Police have previously disclosed information under FOI, and in some instances, actively promoted public information through social and conventional media releases, in respect of its speed enforcement activity. These previous disclosures and proactive media activity significantly undermine the argument put forward by Staffordshire Police that both law enforcement and health and safety would be compromised by disclosure under the Freedom of Information Act.

Furthermore, previous FOI disclosures made by Staffordshire Police demonstrate an inconsistent approach both to the disclosure of information relating to fixed speed enforcement cameras generally and the position outlined by the Force that, since

February 2026, they are following guidance issued by the NPCC; with several examples of disclosure since the issue of guidance by the NPCC.

The following are examples of such disclosure or publication:

- FOI disclosure made to BBC, published 4th November 2017 on its news website under the headline "Half of UK road speed cameras are switched off" in which Staffordshire Police disclosed that it had 272 fixed camera units but that only 14 were active;
- FOI 17977, dated 25th March 2025, when Staffordshire Police fully disclosed information relating to the location and number of activations of the 'top five' fixed speed enforcement cameras within the county for 2024;
- FOI 21619, dated 25th July 2025, when Staffordshire Police fully disclosed information relating to the location and number of activations of the 'top three' fixed speed enforcement cameras within the county for 2022, 2023 and 2024;
- FOI 22082, dated 10th November 2025, when Staffordshire Police fully disclosed information relating to the total number of excess speed incidents recorded at a specific location on the A500 between Porthill and Hanchurch, Stoke on Trent between 1st November 2021 and 1st November 2025;
- FOI 23011, dated 15th June 2026, when Staffordshire Police fully disclosed information relating to the number of excess speed incidents recorded on fixed average speed cameras along a specific location, Newport Road, Woodseaves, Staffordshire in the year up to June 2026;
- FOI 22971, dated 2nd July 2026, when Staffordshire Police fully disclosed information relating to the total number of speeding offences detected by automated (fixed) speed enforcement cameras during the financial year 2024/2025 and providing details of the single site location of the fixed camera recording the most speed offences, that being M6 Southbound between junctions 13-10A;
- Proactive media reporting published on the Staffordshire Police Road Crime Team Facebook page and reported in 'The Sentinel' newspaper on 27th August 2026 under the headline, "Police target speeding



drivers on North Staffordshire M6 – You have been warned!” The article provided detail of a speed enforcement operation carried out by Staffordshire Police at a specific location on the previous day with a clear suggestion of future similar planned operations in the locality;

- FOI 23408, dated 30th September 2026, when Staffordshire Police fully disclosed information relating to the total number of speeding offences recorded by a specific fixed speed enforcement camera on A5 Watling Street, Cannock during 2023, 2024, 2025 and 2026. Staffordshire Police also disclosed a monthly breakdown of excess speed offences from the fixed camera during the previous 12 months, clearly indicating when the camera was and was not active.

Public Interest

Staffordshire Police identify a number of factors which fall in favour of the disclosure of information in respect of this request, namely that:

The public are entitled to know how public funds are spent and how the use of speed cameras can have an effect on drivers using the road. Disclosure of the information would show that SP supports transparency and accountability, also showing that appropriate measures are being taken to improve public safety and reduce offending.

In addition to the basic premise of being open and transparent, confirmation or denial that information is held would promote transparency regarding the operation, placement and enforcement practices of speed cameras. This may enhance public confidence in road safety measures and demonstrate that enforcement is proportionate and evidence based.

To expand on the public interest factors introduced by Staffordshire Police, the public are entitled to expect that a police force would maintain statistical information on the use of speed cameras across its area for reasons of efficiency, audit and cost effectiveness. To neither confirm or deny the existence of such information serves only to undermine the Forces' integrity and the trust and confidence of the public.

Further to these considerations, a primary argument for disclosure is that releasing aggregate data provides reassurance regarding law enforcement activities aimed at protecting community safety. Rather than hindering policing, sharing the overall volume of speed enforcement activity in a particular area demonstrates that the police are actively addressing road safety. It allows the public to evaluate whether enforcement strategies are working or if specific areas require better engineering rather than just cameras. Data requests are justified by the need to inform public debate on local road safety. For instance, showing the volume of offences helps communities understand the actual extent of speeding problems on their road networks.

The fact that Staffordshire Police have, and continue to, disclose and publish information relating to speed enforcement at specific locations supports these transparency, accountability and road safety arguments and undermines counterarguments against disclosure.

To reiterate, in a similar case to this FOI request, the ICO put the case for disclosure, and dispelled the arguments of risk to law enforcement and health and safety, succinctly when it directed Surrey Police to disclose information with the comment:

‘disclosure of the figure [total number of speeding offences at a particular location] in itself may actually deter potential road users from speeding’ (para.32, ICO Decision FS50831062)

Balance Test

It is clear, given the weight of arguments for disclosure, that the balance falls clearly in favour of disclosure in this case.



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I invite Staffordshire Police to review the previous decision and to disclose the information requested in accordance with the required timescales.

I reserve the right to refer this matter to the Office of the Information Commissioner for adjudication.

SP Response

Upon reviewing your request SP are of the opinion that the response issued, alongside all clarification provided, fully answers the terms of your request. New national guidance from the National Police Chiefs Council was received in February 2026 which SP follows. This guidance has changed the way SP responds to requests about speed cameras therefore, responses published prior to February 2026 are not comparable to those published after.

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/>

Information Access Team Management
IAT@staffordshire.police.uk