

22 September 2026

FOI Ref 23340

Request - You asked Staffordshire Police (SP) the following:

Under the Freedom of Information Act 2000, I would like to submit the following request.

To ensure this request remains entirely within the appropriate cost limit under Section 12, the scope of this request is strictly limited to information held by your force's Legal Services Department (or Force Solicitor's Office).

Please state whether your Legal Services Department holds records of any legal claims, Pre-Action Protocol letters (letters before claim), or other correspondence received from or sent to the Alliance Defending Freedom (ADF UK, US, or ADF International), or legal representatives explicitly acting on their behalf, for the period 1 January 2022 to the date this request is processed.

To assist with an electronic search of your legal department's case management database, please search your central case management index for the following keyword terms: "Alliance Defending Freedom" and "ADF".

If any such corporate legal correspondence or case records are held, please provide a list of these matters containing:

The date of the correspondence.

The type of legal action (e.g., Pre-Action Protocol, Judicial Review, Civil Claim, or Statutory Appeal).

The high-level legal subject matter of the dispute (e.g., civil litigation, public law challenge, or statutory appeal).

Please provide copies of the formal legal letters before claim or pre-action letters received from the ADF (with all third-party personal data, individual names, and specific sensitive local facility addresses redacted).

For the avoidance of doubt and to prevent the application of exemptions:

Section 40 (Personal Data): This request excludes the personal data of any individual demonstrators, members of the public, or individual police officers. I am entirely content for all names, addresses, and identifying third-party details to be redacted under Section 40.

Section 31 (Law Enforcement): This request does not seek operational policing plans, local safe access zone tactics, or intelligence reports. It is strictly limited to formal, high-level corporate litigation correspondence managed by your Legal Services department, which carries no risk to local law enforcement operations.

SP received your request on 03/09/2026 and have processed this under the Freedom of Information Act (FOIA).

SP's response to your enquiry is as follows:

SP holds/does not hold the requested information.

The following exemption has been applied:

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

- Section 31 (1)(3) Law Enforcement

Harm:

The request seeks to establish whether the Force's Legal Services Department has received legal correspondence, pre-action protocol letters, threatened claims, judicial review correspondence or other formal legal representations from Alliance Defending Freedom (ADF) or those acting on its behalf. Confirming or denying whether such information is held would itself reveal whether SP has been involved in specific legal disputes, challenges or representations concerning policing activity, decisions or actions. Whilst the applicant states that operational policing information and personal data are not sought, the mere act of confirmation or denial may disclose information about the existence, nature or extent of matters that have attracted legal scrutiny.

Even where no information is held, confirmation of that fact would be informative. Responses from individual police forces could be compared and collated alongside material already available within the public domain, including court judgments, media reporting, published correspondence, campaign material and disclosures made by other organisations. This mosaic effect could enable interested parties to identify which forces have been involved in particular legal challenges or disputes and build a broader picture of policing activity, decision making, areas of focus and perceived vulnerabilities.

Such information could be used to develop an understanding of where policing activity has been subject to challenge, enabling tactics to be adapted accordingly and potentially undermining the effectiveness of law enforcement. Disclosure by confirmation or denial could therefore prejudice the prevention and detection of crime, the apprehension or prosecution of offenders and the police service's ability to fulfil its law enforcement functions.

Public Interest Test:

Factors favouring confirmation or denial – Section 31(3)

There is a public interest in openness and transparency regarding the way in which police forces interact with external organisations and respond to legal representations or challenges. Confirming or denying whether information is held would assist public scrutiny of police decision making, promote accountability and improve understanding of how legal matters involving the police are managed.

Confirmation or denial may also contribute to public confidence that policing activities are subject to appropriate legal oversight and that individuals and organisations are able to challenge police decisions through lawful processes where considered necessary.

Factors favouring neither confirming nor denying – Section 31(3)

There is a strong public interest in safeguarding the ability of police forces to carry out their law enforcement functions effectively. Confirming or denying whether information is held would reveal information about whether SP has been involved in specific legal disputes, challenges or representations, and could assist interested parties in building a picture of policing activity, priorities, areas of focus and perceived vulnerabilities.

The impact of disclosure should not be considered in isolation. When combined with information available from other sources, including disclosures made by other police forces, courts, public bodies or third parties, confirmation or denial could contribute to a wider intelligence picture concerning policing activity and decision making. Such incremental disclosures may undermine operational resilience and could prejudice law enforcement by revealing information that would not otherwise be apparent.

There is therefore a significant public interest in preventing the disclosure of information which, when pieced together with other material, could adversely affect the prevention and detection of crime, the apprehension or prosecution of offenders and the maintenance of public safety.

Whilst s40(5) is an absolute exemption and not subject to a public interest test, there remains a legitimate public interest in protecting individuals' privacy rights and ensuring that personal information is not disclosed through the act of confirmation or denial itself.

Balance Test:

Whilst the Force acknowledges the public interest in transparency and accountability, greater weight is attached to the public interest in protecting the effectiveness of law enforcement activities.

Confirming or denying whether information is held would disclose information capable of being combined with material already available within the public domain, thereby providing further insight into whether particular policing matters, decisions or activities have become the subject of legal challenge or representation. The cumulative effect of such disclosures could prejudice law enforcement interests and undermine operational resilience.

SP therefore considers that the public interest in neither confirming nor denying whether information is held outweighs the public interest in confirmation or denial. Accordingly, the balance of the public interest favours maintaining the Neither Confirm Nor Deny position under Section 31(3).

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

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:



STAFFORDSHIRE
POLICE

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