



STAFFORDSHIRE
POLICE

Our Ref: FOI 23365
Your Ref: FOI 23326
Date: 15/09/2026

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 01/09/2026.

Staffordshire Police (SP) refer to the above request which is copied below:

Please provide the following recorded information for the following locations:

- **Holiday Inn Express Tamworth**, located at Leisure Island, Riverdrive, Tamworth B79 7ND.

Please provide the data covering the period from January 2020 to August 2026, broken down by calendar year.

- **Total Crimes by Residents:** The total number of recorded crimes where a identified suspect or offender has a primary recorded home address containing the address location.
- **Crime Breakdown by Offence:** A breakdown of these recorded crimes by specific offence category/description (e.g., violent crime, sexual offences, theft, criminal damage).
- **Outcome Data:** A breakdown of the recorded outcomes for these specific crimes (e.g., Charged/Cautioned, Evidential Difficulties, Out of Court Disposal).

Personal data

I do not seek any information that identifies, or could identify, any individual. I am content for you to suppress or aggregate any cell containing fewer than five records, provided suppressed cells are clearly marked as suppressed rather than reported as zero, and provided the suppression is applied consistently and described in your response.

Please provide this data in an editable electronic format, preferably a Microsoft Excel spreadsheet (.xlsx) or CSV file.

You have requested an Internal Review which is copied below:

I am writing to formally request an internal review of Staffordshire Police's decision, issued on 8 September 2026, to refuse my Freedom of Information request (Ref: 23326) under Section 12(1) of the Freedom of Information Act 2000 (FOIA).

Background

On 1 September 2026, I submitted a request for recorded information regarding crimes where an identified suspect/offender had a primary recorded home address corresponding to the Holiday Inn



Express Tamworth, Leisure Island, Riverdrive, Tamworth B79 7ND, covering January 2020 to August 2026.

On 3 September 2026, Staffordshire Police fulfilled this request in full by issuing a formal response and attaching the requested dataset in Excel format (FOI 23326 Holiday Inn Express Tamworth Data.xlsx), providing total crime counts, offence breakdowns, and outcome data totaling 452 recorded crimes.

However, on 8 September 2026, Staffordshire Police issued a revised response retracting the initial disclosure, citing Section 12(1) (Cost Limit) and stating that the previous response was sent in error.

Grounds for Appeal

1. Failure to Support Cost Estimate and Over-broad Interpretation of Search Criteria Staffordshire Police states that a manual review of 452 records is required because its system "has incorrectly linked associated addresses as the residential address." Under Section 12(1), an authority can only rely on reasonable estimates. In *Chief Constable of South Yorkshire Police v Information Commissioner* [2011] UKUT 285 (AAC), it was established that cost estimates must be realistic, sensible, and supported by cogent evidence.

The public authority generated and disclosed the exact, structured dataset on 3 September 2026. Citing a system-level administrative discrepancy after already compiling and releasing structured statistical data does not automatically render the entire dataset exempt under Section 12.

2. Section 16 Duty to Advise and Assist Under Section 16 of FOIA, a public authority has a statutory duty to provide advice and assistance to help a requester narrow their request. While Staffordshire Police suggested reducing the timeframe to two years or less, this advice ignores the fact that the authority has already extracted the underlying dataset.

If Staffordshire Police asserts that manual checks are necessary solely to confirm whether an address field designates a primary residence versus an associated address, the authority should offer meaningful refinement options—such as providing the unverified recorded address matches with appropriate disclaimers, or providing data for specific high-volume offence categories (e.g., violent crime or burglary) over a refined multi-year period.

Remedy Requested

I request that Staffordshire Police reconsider its Section 12 refusal and either:

1. Re-instantiate the disclosure provided on 3 September 2026 with any necessary explanatory context or caveats regarding address field recording protocols; or
2. Provide refined statistical data under Section 16 guidance focusing on a subset of crime categories across half of the time period - **January 2023 to August 2026**.

Should the internal review uphold the refusal under Section 12, I am prepared to escalate this matter to the Information Commissioner's Office (ICO) for a formal decision notice.

Thank you for your time and consideration.



SP Response

An internal review is an opportunity to have the original questions posed in the original Freedom of Information request reviewed.

Upon reviewing your request for information under the Freedom of Information provision referenced above and all corresponding communication, SP are of the opinion that the response issued, alongside all clarification provided, fully answers the terms of your request.

SP confirms that the application of all exemptions outlined within this response are fully justified, and that the explanations and rationale for their application conveyed clearly and unequivocally.

To clarify, the explanation given in the response regarding the incorrect data that was sent in error tried to explain how the data originally provided was in fact an incorrect dataset. The Freedom of Information Team sought advice from analytical experts and unfortunately, they were provided with incorrect advice on how to retrieve the data. A manual trawl is the only way to establish the correct data from the data that the system used to service your request has been able to produce. To explain further the data retrieved also included suspect or offenders seen outside the location so further enquiries on other police systems would need to be carried out to cross reference the data to establish what the correct "primary recorded home address" (as you requested) is and to establish whether or not each occurrence did answer question one.

Further searches have then been completed to establish whether there is any readily available other way of obtaining the requested data from the system used without performing a manual trawl. Having completed this review, the data SP suggested in section 16 advice and assistance relating to two years' worth of data is likely to attract a further exemption.

The application of S12 is not the same as the ICO case you quote in relation to South Yorkshire Police and the application of S12 does not in any way relate to redaction time in this instance. AI may have been used to assist with your request for an internal review and sometimes SP have found that ICO decision notices and case law are incorrectly referenced by AI and are not relevant.

Remedy 1 - SP is not able to provide the data suggested in remedy 1 because this data is incorrect.

Remedy 2 is not what was suggested as a refinement to bring the request under the time and cost threshold and is more than two years' worth of data so would again attract S12. As explained above, upon review, providing even 2 years' worth of information will attract further exemptions, so SP cannot provide this information following review.

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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