



STAFFORDSHIRE
POLICE

Our Ref: 23426
Your Ref: 23355
Date: 28/09/2026

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 07/09/2026.

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

This request concerns the "Thinking Skills" course/intervention used by Staffordshire Police in connection with Out of Court Resolutions.

Please provide:

- a) the full name of the Thinking Skills course/intervention currently used;
- b) the organisation which provides or supplies it;
- c) whether Staffordshire Police delivers it itself or refers participants to an external provider;
- d) the types of Out of Court Resolution for which it may be used, including Community Resolutions and/or Conditional Cautions; and
- e) if the provider or course has changed since 1 January 2023, the previous provider/course and approximate date of the change.

Please provide copies of any current policies, guidance, instructions, referral criteria, decision-making documents or other recorded material held by Staffordshire Police which explains when an officer or decision-maker should select the Thinking Skills intervention.

I am particularly interested in guidance identifying the behaviours, offending patterns, circumstances or offence types for which Thinking Skills is considered appropriate.

Please provide copies of any materials for the Thinking Skills intervention held by Staffordshire Police, including, where held:

- * participant workbooks or handouts
- * course/module outlines and learning objectives;
- * presentation slides;
- * questions and exercises;
- * video/audio transcripts



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- * assessment material;
- * facilitator/instructor guidance; and
- * completion or pass criteria.

If Staffordshire Police does not hold the full course materials because they are retained by an external provider, please identify which of the above categories Staffordshire Police does hold.

For each calendar year 2023, 2024, 2025 and 2026 year-to-date, please provide:

- a) the number of people referred to or required to undertake the Thinking Skills intervention;
- b) where recorded, a breakdown by the offence or offence category associated with the referral; and
- c) where recorded, a breakdown by the type of Out of Court Resolution used.

If this information is not held in precisely these categories, I would be grateful for the nearest equivalent information that can be readily extracted from your records.

I am seeking statistical information only and do not require personally identifying information.

Please state whether, from 1 January 2023 to the date of this request, Staffordshire Police has used the Thinking Skills intervention in connection with alleged offences principally involving

- * speech or expression;
- * social-media or other electronic communications;
- * protest or campaigning activity; or
- * public-order offences involving words, communications or expression.

Where this information is recorded in a manner that can be readily retrieved, please provide the number of such referrals and the associated offence or offence categories.

I am seeking statistical information only and do not require names or other personally identifying information.

Please provide copies of any documents held by Staffordshire Police concerning:

- a) evaluations or assessments of the effectiveness of the Thinking Skills intervention;



- b) equality impact assessments, human-rights assessments or data-protection impact assessments specifically relating to its use;
- c) Out of Court Resolution scrutiny-panel reports, minutes or findings which specifically discuss or assess cases in which Thinking Skills was selected, with personal information redacted as necessary; and
- d) the current contract, purchase order, service specification or other procurement document identifying the provider and cost of the Thinking Skills intervention.

Where responsive information is already publicly available, I would be happy to receive a link or reference identifying the relevant document instead of a duplicate copy.

If complying with the entirety of this request would exceed the appropriate cost limit, I would be grateful for advice and assistance under section 16 of the Freedom of Information Act as to how the request could be narrowed while preserving as much of the requested information as possible.

Please provide the information electronically.

Clarification received on 22/09/2026:

My request relates specifically to the contracted Thinking Skills course/intervention used in connection with Out of Court Resolutions, rather than wider external training undertaken by staff which may contain Thinking Skills modules.

You have requested an Internal Review which is copied below:

Thank you for your response to FOI 23355.

I am requesting an internal review of the application of section 43(2) to the procurement information requested.

I am happy to substantially narrow this part of my request. I am **not seeking commercially sensitive contractual clauses, pricing methodology, bid information, negotiation material or other information which would genuinely prejudice a supplier's competitive position.**

I would instead ask that the review consider disclosure of the following recorded information only:

1. The total amount paid by Staffordshire Police for the Thinking Skills intervention in each financial year from 2023/24 onwards;
2. The current annual cost, licence fee or other aggregate amount payable for access to the Thinking Skills intervention, if recorded;



3. Where the Thinking Skills intervention forms part of a wider package or licence and its individual cost cannot be separated, the total value of that package or licence and a brief description of what it covers;
4. The start date and end date of the current relevant contract or arrangement, including any extension periods;
5. If readily available, whether charges are calculated on a fixed licence basis, per referral/course, or by another charging model, without disclosing commercially sensitive unit rates if these are considered exempt.

My concern with the original response is that section 43(2) appears to have been applied to the procurement material as a whole. ICO guidance states that where a contract is requested, authorities should consider the information within it individually rather than applying section 43 in a blanket fashion. It also states that commercial sensitivity alone is insufficient: there should be a causal relationship between disclosure of the particular information and the claimed prejudice.

I therefore ask that the reviewer consider whether the limited aggregate financial and contractual information above can be disclosed even if particular clauses, rates or other commercially sensitive details remain withheld.

There is also a public interest in transparency regarding expenditure on this intervention. Staffordshire Police has disclosed that the Thinking Skills course has been used 229 times between 2023 and 16 September 2026, including in connection with a range of offence categories. Staffordshire Police has also stated that it holds no course materials, referral guidance, effectiveness assessment, equality/human-rights/data-protection assessment specifically relating to its use, or scrutiny-panel material specifically assessing cases where Thinking Skills was selected. In those circumstances, I believe disclosure of the aggregate cost and contractual scope would materially assist public understanding and scrutiny of expenditure on the intervention.

I am content for any genuinely commercially sensitive information to remain redacted.

SP Response

Upon review of 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 confirm 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, an internal review is an opportunity to review the original questions posed and the response issued.

Section 43(2) Commercial Interests was applied to the below question:



- d) the current contract, purchase order, service specification or other procurement document identifying the provider and cost of the Thinking Skills intervention. – **Withheld.**

However, to assist, the below amended questions have been considered as part of this review. Please find below the answers to each question:

1. The total amount paid by Staffordshire Police for the Thinking Skills intervention in each financial year from 2023/24 onwards; **These are zero value concessions contracts.**
2. The current annual cost, licence fee or other aggregate amount payable for access to the Thinking Skills intervention, if recorded. **£0 to Staffordshire Police.**
3. Where the Thinking Skills intervention forms part of a wider package or licence and its individual cost cannot be separated, the total value of that package or licence and a brief description of what it covers; **£0.**
4. The start date and end date of the current relevant contract or arrangement, including any extension periods; **Red Snapper; 01/07/2026 – 30/06/2027, Softcat 3rd party reseller contracted for the provision of the Advent services: 03/03/2025 – 02/03/2028.**
5. If readily available, whether charges are calculated on a fixed licence basis, per referral/course, or by another charging model, without disclosing commercially sensitive unit rates if these are considered exempt. **Not Applicable.**

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

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