



FOI ref no: SCO/FOI/050/2025

Date: 3 February 2026

Dear Applicant

The Office of the Police, Fire and Crime Commissioner has answered your request as a cascading response, rather than an umbrella answer.

We must apologise for the delay in the response which has been down to mainly unexpected and difficult times for the authority. We have reviewed the request, and you will see several exemptions applied. For some information we can neither confirm nor deny whether it holds the information as it would disclose personal data relating to an identifiable individual. Disclosure of that information would be unfair and unlawful and would contravene the data protection principles set out in Article 5 of the UK General Data Protection Regulation and Section 34 of the Data Protection Act 2018.

The duty to confirm or deny in Part D of your request, for example is comprising of six requests and are excluded under section 40(5B)(a)(i) of the Freedom of Information Act 2000, read with section 40(2). In several parts, merely confirming or denying whether information is held would itself reveal personal data about identifiable living individuals, particularly vulnerable or where confirmation or deny would indicate safeguarding information.

This is an absolute exemption and does not require a public interest test. The Freedom of Information Act is not intended to provide access to personal data about third parties. If the individual concerned wishes to access their own information, this may be requested via a Subject Access Request under data protection legislation.

Dear FOI Officer,

I am submitting a request under the Freedom of Information Act 2000 for all information not constituting personal data that relates to how the Staffordshire Police, Fire & Crime Commissioner (PFCC) and PFCC Office handled, processed, discussed, assessed, rejected, or otherwise acted upon the complaints submitted by me.

Nearly all of the material captured by your request comprises documents and emails originally provided by you to the PFCC. This information is reasonably accessible to you otherwise than under FOIA, as you already hold it. In line with the ICO guidance, we are therefore applying section 21 FOIA (absolute exemption) and are not re-supplying those duplicates here.

By way of confirmation emails are no longer retained longer than two years in line with Staffordshire Police/PFCC retention policy unless previously extracted as part of a copy.

2021

Only one email exists that has been extracted from the email as document which response is produced below.

Staffordshire Commissioners Office, First Floor, Block 9, Weston Road, Stafford ST18 0YY

Contact us: 01785 232385 X: @StaffsPFCC

www.staffordshire-pfcc.gov.uk



From: PFCC
Sent: 05 July 2021 12:30
To: XXXXXXXXXXXXXXXXXXXXXXXXX>
Subject: RE: XXXXXXXXXXXXXXX

Dear XXXXXXXXXXXXX

Thank you for copying in the commissioner's office with your concerns.

We can see that the email has also gone to the Senior Staffordshire Policing Team. As this is an operational matter, this will be best dealt with via them, and you will receive a response at their first opportunity.

Thank you for contacting the commissioner's office.

Kind Regards"

2022
NOT HELD
2023
2024
2025

This request specifically concerns the PFCC Office's actions, decisions, internal procedures, staff communications, and organisational conduct.
(A separate SAR has already been submitted for personal data.)

PART A – INTERNAL PFCC OFFICE COMMUNICATIONS

Please provide all internal PFCC Office communications relating to:

1. My complaints submitted on:

2021 communications copied to the PFCC
Section 40(2) & (5B)(a)(i)

Complaints and safeguarding concerns escalating 2022–2023
Section 40(2) & (5B)(a)(i)

Complaints about PSD failings in 2023–2024
Section 40(2) & (5B)(a)(i)

Complaints submitted in 2025, including complaints raised on 10, 17 and 30 September 2025
Section 40(2) & (5B)(a)(i)

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Complaints against former CC Gareth Morgan, CC Chris Noble, and CC Rebecca Riggs

The final response RR / CN was sent to the requestor on 14 October 2025

Any internal discussion of the Home Secretary correspondence (DECS MIN/1327975/25)

Not Held beyond the submission of the requestor.

This includes communications even where I am not named, such as those referring to “the complainant”, “the father”, “the safeguarding complainant”, etc.

Please include:

Emails (sent, received, forwarded)
Internal memos or briefing notes
Team messages (Teams, Slack, WhatsApp etc)
Drafts of letters and internal decision notes
Preparatory documents for responses
Any annotations or tracked changes
Any file notes, actions, or decision logs

These are under the definition of personal data, directly or indirectly, linked to a living person are considered as exempt under s.40. The correct path is a right of access request for which is noted that you have already exercised.

PART B – COMMUNICATIONS BETWEEN PFCC OFFICE AND EXTERNAL BODIES

Please provide all communications concerning the above complaints between the PFCC Office and:

1. Professional Standards Department (PSD)
2. Staffordshire Police Executive Team
3. Independent Review Manager (IRM)
4. The Home Secretary / Home Office
5. The PFCC Panel Secretariat (Staffordshire County Council)
6. Any local authority safeguarding teams
7. Any solicitors or legal advisors (with privileged content redacted as necessary)
8. Any external oversight or advisory body consulted

Section 40(1) (requester’s own personal data → Right of Access Request)

Section 40(2) & (5B)(a)(i)

Section 21

This includes:

Emails
Advice requests
Case summaries
Discussions about whether complaints should be recorded
Discussions about Schedule 3 obligations

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Communications relating to IOPC referral decisions
Notes about reputational impact or risk

PART C – PFCC DECISION-MAKING AND HANDLING RECORDS

These are under the definition of personal data, directly or indirectly, linked to a living person are considered as exempt under s.40. The correct path is a right of access request under Article 15 UK GDPR, for which it is noted that you have already exercised.

Please provide:

1. All internal decision logs relating to my complaints
S.40(2) (requester's own personal data → Right of Access Request)
2. Documents showing how the PFCC assessed whether my complaints should be recorded under Schedule 3
Section 40(1) (requester's own personal data → Right of Access Request)
3. Any internal summaries provided to PFCC staff or the Commissioner
Section 40(1) (requester's own personal data → Right of Access Request)
4. Any instructions, directions, or guidance given by the Commissioner to staff
Section 40(1) (requester's own personal data → Right of Access Request)
5. Records of meetings or briefings where my complaints were discussed
Section 40(1) (requester's own personal data → Right of Access Request)
6. Any documents explaining why the PFCC declined to act as Appropriate Authority
Not Held
7. Documents showing how or why contact restrictions were supported or communicated to PFCC Office
Not Held
8. All drafts of letters responding to my complaints (with personal data removed) **Section 40(1) (requester's own personal data → Right of Access Request)**

PART D – DOCUMENTS RELATING TO THE INDEPENDENT REVIEW MANAGER (IRM)

This Part D request has been exempted using Section 40(2) & (5B)(a)(i). The disclosure or confirmation of such information would contravene, if held, UK GDPR Articles 5(1)(a) and 5(1)(f) (lawfulness & confidentiality). Much of Part D cannot be addressed under FOIA for three separate reasons:

The requested information constitutes personal data about you, your daughter, or identifiable police officers therefore Section 40(1)/(2) applies.



In several parts, merely confirming or denying whether information is held would itself reveal personal data about identifiable living individuals, particularly vulnerable or where confirmation or deny would indicate safeguarding information.

Please disclose all PFCC-held documents that relate to:

The IRM's assessment of my daughter's safeguarding case

Section 40(2) & (5B)(a)(i)

Recommendations identifying additional officers for investigation

Section 40(2) & (5B)(a)(i)

Internal PFCC discussions about whether to act on those recommendations

Section 40(2) & (5B)(a)(i)

Any decision document showing why no action was taken

Section 40(2) & (5B)(a)(i)

Any communication between PFCC staff and PSD about the IRM report

Section 40(2) & (5B)(a)(i)

Any briefing prepared for or by the Commissioner regarding the IRM findings

Section 40(2) & (5B)(a)(i)

These documents need not contain personal data — this request is for organisational records only under FOIA.

PART E – COMMUNICATIONS RELATING TO PUBLIC COMMENDATION OF CHIEF INSPECTOR McGrath

Please provide:

All communications relating to the Commissioner's public commendation or photo-op with Chief Inspector Scott McGrath

NOT HELD

Any discussion of the appropriateness of issuing an award following IRM findings

NOT HELD

Any internal or external queries raised about the optics or timing of the commendation **NOT HELD**
(This does not request personal data, only organisational reasoning and communication.)

Thank you for your assistance. Please confirm receipt of this request and confirm I will receive the above within the 20-day statutory limit.

If you are dissatisfied with this response, you may request an independent internal review of our handling of your request by submitting a request within two months. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

As part of any internal review the team's handling of your information request will be reassessed by a senior member of staff who was not involved with its decision to this response.

Kind regards,

Freedom of Information Team

Staffordshire Commissioners Office, First Floor, Block 9, Weston Road, Stafford ST18 0YY

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