



Northamptonshire Police ICO Enforcement Notice: FOI Compliance

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Executive Summary

On 5 August 2026, the Information Commissioner issued Northamptonshire Police with Enforcement Notice ENF0988400 following non-compliance with sections 1(1) and 10(1) of the Freedom of Information Act 2000. The Notice requires the publication of an action plan, supported by a lessons learned exercise identifying the root causes of delays and failings. Formalising measures to mitigate them, it also requires the requests within scope of the Notice to be dealt with lawfully by 5 February 2027.

Background and Context

Northamptonshire Police received 1,352 Freedom of Information requests in 2024 and 1,425 requests in 2025. During this period, the force experienced non-compliance with statutory FOI response timescales. In 2025, a significant number of overdue historic FOI requests were closed without confirmation from applicants that the information was no longer required.

Requirements of the Enforcement Notice

Enforcement Notice ENF0988400 sets out the regulatory requirements Northamptonshire Police must meet following the Commissioner's findings of non-compliance with sections 1(1) and 10(1) of the Freedom of Information Act 2000.

The Notice requires the force to publish an action plan supported by a lessons learned exercise, identifying the root causes of delay and the controls required to mitigate recurrence. It also requires all Freedom of Information requests within scope of the Notice to be handled lawfully by 5 February 2027.

Scope of this action plan

This action plan applies to Northamptonshire Police's response to ICO Enforcement Notice ENF0988400 and the Freedom of Information governance failures that led to it. It covers the immediate recovery work required to address overdue FOI requests within scope of the Notice, alongside the longer-term governance, people, process, records and demand-management controls needed to prevent recurrence and support sustained compliance with the Freedom of Information Act 2000.

Action Plan

Each action below is tracked against a named owner and target date, with progress reported through Information Management Board and Deputy SIRO, and escalated into Organisational Change & Risk Management Board and SIRO where required.

1. Governance and Accountability

Ref	Finding / Lesson	Action	Owner	Target Date	Status
GA.1	Inadequate governance and decision-making controls resulted in a compliance-related decision that was inconsistent with the requirements of the Freedom of Information Act 2000	Introduce a formal FOI decision and escalation control for matters with statutory, regulatory or reputational risk, with escalation via IMB and Deputy SIRO into OCRMB and SIRO where required. Decisions will be supported by senior approval, legal or information governance review where required, and a decision log recording rationale, risks, approvals and review points.	Deputy SIRO	30/09/2026	In progress
GA.2	Strategic oversight and escalation arrangements were not sufficiently effective in identifying, challenging and preventing prolonged FOI non-compliance.	Strengthen governance reporting through the Information Management Board and senior escalation routes, including routine reporting of backlog, statutory compliance, aged cases, key risks, decisions required and blocked actions. Escalation criteria will be documented and applied consistently where statutory timescales or regulatory commitments are at risk.	Deputy SIRO	31/10/2026	In progress
GA.3	There was a lack of effective leadership structure and oversight to provide clear operational direction, accountability and senior escalation for FOI recovery	Implemented a revised FOI leadership structure, including Strategic Lead operational ownership, Deputy SIRO oversight, and temporary subject matter expertise to support	Deputy SIRO	30/09/2026	Implemented

Ref	Finding / Lesson	Action	Owner	Target Date	Status
	and compliance improvement.	assurance, decision-making and escalation.			

2. People and Capability

Ref	Finding / Lesson	Action	Owner	Target Date	Status
PC.1	The FOI function did not have sufficient sustained capacity and resilience to manage demand, backlog recovery and statutory compliance consistently.	Strengthen FOI capacity and resilience by allocating an experienced decision-maker to oversee backlog recovery, dedicating two experienced FOI disclosure officers to case progression, and recruiting additional administrative support to improve throughput and support sustained compliance.	Strategic Lead for Information Assurance	01/12/2026	In progress
PC.2	Organisational understanding of FOI responsibilities, internal deadlines and the consequences of non-compliance was inconsistent across business areas.	Deliver targeted engagement and guidance for Information Asset Owners, senior leaders and key business areas to strengthen understanding of FOI responsibilities, internal deadlines, escalation routes and the consequences of non-compliance.	Strategic Lead for Information Assurance	30/11/2026	In progress
PC.3	The training needs analysis identified that FOI practitioners and disclosure officers did not have sufficient, consistent or role-specific training to support effective case handling and statutory compliance.	Implement a structured FOI training programme for practitioners and disclosure officers, informed by the TNA and focused on statutory duties, exemptions, public interest tests, case recording, quality assurance, escalation and decision-making. Completion and effectiveness will be monitored through supervision, quality checks and PDR objectives.	Strategic Lead for Information Assurance	31/12/2026	In progress

3. Systems, Technology and Process

Ref	Finding / Lesson	Action	Owner	Target Date	Status
ST.1	Current case management and workflow arrangements do not provide sufficient functionality to support effective oversight, workflow control, reporting, audit trails or automation of routine FOI processes.	Procure a dedicated case management system or significantly enhance the current in-house solution. To improve oversight of requests, workflow management, management information, business-area reporting, audit trails and automation of routine processes including registration, closure and template correspondence.	Strategic Lead for Information Assurance	31/12/2026	In progress
ST.2	Management information was not sufficiently comprehensive or timely to provide reliable oversight of FOI demand, backlog, ageing, compliance and risk.	Develop a routine FOI performance dashboard or reporting mechanism showing live requests, backlog, aged cases, statutory compliance, internal delays, business-area performance and cases requiring escalation. Reports will be shared with relevant governance forums and senior owners.	Strategic Lead for Information Assurance	31/12/2026	Not started

4. Records Management

Ref	Finding / Lesson	Action	Owner	Target Date	Status
RM.1	Historic and legacy FOI records were not consistently visible within routine reporting, creating a risk that overdue cases	Conduct a reconciliation exercise across current and legacy FOI records to confirm the full position on open, closed, reopened and	Strategic Lead for Information Assurance	30/09/2026	In progress

Ref	Finding / Lesson	Action	Owner	Target Date	Status
	were not identified, tracked or progressed effectively.	historic overdue requests. Establish a repeatable reconciliation control so that all FOI cases in scope are visible in management reporting and recovery planning.			
RM.2	FOI case records were not always maintained to a consistent standard, affecting the ability to evidence actions taken, decisions made and the basis for case closure.	Introduce minimum FOI record-keeping standards and periodic checks to ensure case records are complete, accurate and capable of supporting effective oversight and assurance.	Strategic Lead for Information Assurance	31/10/2026	In progress

5. Demand Management

Ref	Finding / Lesson	Action	Owner	Target Date	Status
DM.1	FOI demand and backlog were not managed through a sufficiently structured prioritisation model, contributing to prolonged delays and increased statutory risk.	Implement a backlog recovery plan using ageing analysis, risk-based prioritisation and weekly progress review. The plan will identify cases within the scope of the Enforcement Notice, allocate ownership, track milestones and escalate blockers that may affect delivery by the required statutory deadline.	Strategic Lead for Information Assurance	30/09/2026	In progress
DM.2	High-demand business areas were not consistently supported or held to account for timely FOI input, increasing the risk of internal delay.	Introduce targeted engagement with high-volume and high-risk business areas, including named points of contact, agreed internal response times, regular review of outstanding requests and escalation where deadlines are missed. Performance by business area will be	Strategic Lead for Information Assurance	30/11/2026	Not started

Ref	Finding / Lesson	Action	Owner	Target Date	Status
		reflected in routine reporting.			

