



## **FREEDOM OF INFORMATION REQUEST**

Please note the text of this request has been reproduced exactly as received.

**FOI Reference number: FOI 08/2025**

**Date: 16 June 2025**

### **Request.**

would like to request the following from the Northern Ireland Policing Board (NIPB);

#### **1. Information on how the Northern Ireland Policing Board record their minutes.**

On inspection of some NIPB current committee minute taking I have noted that the information recorded does not give me a full open and transparent view of the meetings, they are not detailed enough to accurately reflect the proceedings and decisions made, are not evident when published.

### **Answer:**

Minutes are prepared in line with the Board's Standing Orders [policing-board-standing-orders-april-2024-a.pdf](#)

Following each meeting, minutes are drafted in the Board's agreed corporate format and circulated for review by the relevant Lead/Board officials for factual accuracy checking. Where external guests are in attendance at meetings, relevant extracts of minutes are shared with attendees for factual accuracy checks. Following this process draft minutes are subsequently brought to the relevant Committee or Board meeting where Members are asked if the minutes can be agreed/approved as an accurate record. Where agreed/approved Board and Committee minutes are then published on the Board's website.

### **Is there a specific pathway or template that they follow or conform to?**

### **Answer:**

Please refer to the response to question 1 above.

I also note that you frequently refuse to supply certain FOI requests but when doing so you fail to fully explain why you are doing so as is required by legislation.

### **Can you please furnish me with details of the last five FOI refused requests**

### **Answer:**

Please see table below

FOI Number	Website link
FOI 89/2024	<a href="#">foi-ormeau-road-incident-discussions-held-with-the-former-chief-constable.PDF</a>
FOI 90/2024	<a href="#">foi-copy-papers-documents-meeting-agendas-reports-presented-policing-board-members-september.PDF</a>
FOI 98/2024	<a href="#">foi-copy-papers-documents-meeting-agendas-reports-presented-policing-board-members-october.PDF</a>
FOI 101/2024	<a href="#">foi-service-delays.PDF</a>
FOI 104/2024	<a href="#">foi-medical-appeal-tribunals.PDF</a>

**What procedure did you follow in deciding that the information was vexatious, budget busting, security reasons or not for public consumption?**

**Answer:**

Reference is made to the guidance issued by the Information Commissioner's Office – see the attached link [Freedom of information and environmental information regulations | ICO](#)

**Do you ask for assistance when deciding how to further proceed with these requests?**

**Answer:**

The FOIA provides for access to recorded information and requires that the applicant describe the information sought.

The above commentary is asking the Policing Board a question rather than to provide a copy of recorded information. As such the question is not a valid request for information under section 8(1)(c) of the FOIA.

**Can you forward copies of all decision making records kept by the FOI office of NIPB in handling these 5 refusals?**

Please see the attached documents at Annex A

**Copy of the diary or decision book entries kept by the Chief Executive in relation to refusing the FOI. (Redacted with non- relevant information)**

**Answer:**

The Policing Board does not hold any information within the scope of this request.

**With relation to FOI requests, are these ever brought before any meetings of the NIPB, political or appointed members before being released or refused?**

**Does the Chief executive share any of this information with the Chairman?**

**Does the Chairman of NIPB have any input into correspondence regarding FOI requests?**

**Answer.**

The FOIA provides for access to recorded information and requires that the applicant describe the information sought.

The above commentary is asking the Policing Board a series of questions rather than to provide a copy of recorded information. As such the questions are not valid requests for information under section 8(1)(c) of the FOIA.

If you have queries about this request or the decision, please contact the Board quoting the reference number above. If you are unhappy with the service you have received and wish to make a complaint or request a review you should contact the Board's Chief Executive -

Via Email: [foi@nipolicingboard.org.uk](mailto:foi@nipolicingboard.org.uk)

Or in writing at the following address:

Northern Ireland Policing Board  
James House  
Block D  
2 – 4 Cromac Avenue  
The Gasworks  
Belfast  
BT7 2JA

You should contact the Board within 40 working days of this response.

If you are not content with the outcome of your complaint, you may apply directly to the Information Commissioner. Generally, the Information Commissioner's Office cannot investigate or make a decision on a case unless you have exhausted the complaints procedure provided by the Board. You should make complaints to the ICO within six weeks of receiving the outcome of an internal review.

The Information Commissioner can be contacted at the following web link –

[www.ico.org.uk/foicomplaints](http://www.ico.org.uk/foicomplaints)

or in writing at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
SK9 5AF

Telephone: - 0303 1231114  
Email: - [ni@ico.org.uk](mailto:ni@ico.org.uk)

Please be advised that Policing Board replies under Freedom of Information may be released into the public domain via our website @ [www.nipolicingboard.org.uk](http://www.nipolicingboard.org.uk).

Personal details in respect of your request have, where applicable, been removed to protect confidentiality.

# ANNEX A

## **FOI 17/2024 Section 36 Exemption “Effective Conduct of Public Affairs”**

### **Public Interest Test**

The above exemption is a qualified exemption, and a Public Interest Test must be carried out to decide whether the public interest in maintaining the exemption outweighs the public interest in disclosure.

### **Information requested by the applicant**

The minutes of a Policing Board Meeting held on 31 August 2023.

### **Arguments in favour of disclosure of the requested information**

1. Disclosure of the requested information would be in line with the spirit and requirements of the Freedom of Information legislation in asking public bodies to be open and transparent and would help promote accountability about how the Board performs its functions.
2. The issue discussed at the Board meeting generated media coverage and, therefore, it could be argued that there is a public interest in releasing the requested information.

### **Arguments in favour of engaging the exemption and withholding the requested information**

1. Withholding disclosure would safeguard openness in all communications internally between Board Officials, as well as with Board members as well as between the Board and relevant third parties. This will ensure a full and frank exchange of views and robust discussion, which in turn is fundamental to the administration of justice.
2. There is a public interest in allowing the Board to effectively exercise its functions, including holding the Chief Constable to account. The disclosure of this information may make such scrutiny by the Board more difficult to conduct in the future by inhibiting full and frank discussion.
3. It is important that the Board members have private thinking space to explore all aspects of the issues under consideration in such special meetings, without fear that partially-formed views will enter the public domain. The exercise of the exemption, therefore, is necessary to allow the Board to reach thorough and fair conclusions.

### **Result**

Taking into account all of the deliberations above, it is felt that the public interest in engaging the exemption to withhold the information outweighs the arguments towards disclosure.

As a result, the requested information should not be provided.

Factors to consider when considering the use of Sect 14 Vexatious

- **Burden request places on an organisation**
- **Breadth of request**

Request is for

- (i) a list of all papers / documents / reports presented to the members of the Policing Board before and during its monthly meeting in September.
- (ii) A copy of all papers / documents / reports presented to the Board before any during this meeting.

**Factors considered when determining that Section 14 (Vexatious) is engaged –**

The Policing Board is a small organisation with approximately 50 staff. To progress the request would involve senior officials from across the organisation reviewing the papers submitted to the September Board Meeting. This would involve individuals at various senior grades such as the drafter of the paper (staff officer / deputy principal), Director as head of the Directorate (responsible for approving the paper) and the Chief Executive reviewing the papers they had responsibility for to determine if it was suitable for release or to consider what exemptions may apply.

The requestor has submitted a blanket request for all papers / documents / reports presented to the Board rather than identifying specific topics of interest. As such there is no clearly defined public interest in the subject of the request.

It is considered that the amount of time that it would take for officials to complete the review of all the papers diverting them away for other critical areas of Policing Board work would impose a 'grossly oppressive burden' on the organisation due to the breadth of information sought against the value or purpose of the request.

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## FOI 101/2024 (folder 1051\24)

Information requested –

Please provide the following information:

1. Provide the number of FOI requests the NIPB has responded to citing a delay in the time taken to complete / progress an element of work activity due to moving offices. Please also provide the time period (from and to) that this figure falls within.
2. Provide the number of official letters, emails or other correspondances the NIPB has written citing a delay in the time taken to complete / progress an element of work activity due to moving offices. Please also provide the time period (from and to) that this figure falls within.
3. Provide the number of emails / letters / other correspondances the NIPB has written to former RUC / PSNI Officers explaining the delays in service provision directly relating to ill health retirements and / or injury on duty awards as per questions 1 and 2 (above).

### **Rationale for engaging Section 12 (above appropriate limit)**

Available records (524733) indicates that one Directorate (PPIB) and the compliance Section began issuing acknowledgement letters to customers from 8 March 2023 to inform them of the imminent move to James House and that it may not be possible to meet the statutory timescale for replying to the correspondence.

Corporate records do not show what procedures were implemented within other branches / directorates.

It is also important to note that this information only relates to acknowledgement letters and not any subsequent response which may reference a delay in responding due to the move to James House.

There is no corporate record of the specific period of time during which correspondence may have referenced a delay as a result of our premises move. As such the Board would have to review the electronic records created over a period of several months as a conservative estimate. The Board creates a substantial number of electronic documents typically in excess of 3000 plus each month – see figures below –

March 2023 – 3798

April 2023 – 3145

May 2023 – 2980

As a conservative estimate it would take 3 minutes to identify if the record was created by the Board, access the record, review the contents to establish if it referenced a delay and if so document the date and category it falls into ie FOI/ IOD etc.

Taking the volume of records created in March 2023 alone it is calculated that it would take Approximately 190 hours to review these records.

This is substantially above the 18 hour time limit set out in legislation for a public body such as the Policing Board and as such would exceed the appropriate cost limit.

From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: FOI 104/2024 -Amended Response  
Date: 29 January 2025 13:33:16

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Completely agree [REDACTED]

Thanks

[REDACTED]

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From: [REDACTED]  
Sent: 29 January 2025 13:27  
To: [REDACTED]  
Cc: [REDACTED]  
<[REDACTED]>  
<[REDACTED]>  
Subject: FOI 104/2024 -Amended Response

[REDACTED]

Thank you for your e-mail below. On the understanding that no information about MAT's are shared in the public domain I have been giving the wording of the request some more thought.

It could be argued that all the information sought would be deemed personal information and therefore exempt under Sect 40 (2) Third Party Data.

By providing the tribunal reference number we would be sharing personal information because it relates to an identified or identifiable individual. The other information sought, if held, would, having been linked to a tribunal reference number, be considered personal data.

Let me know what you think and we can discuss further the wording of our agreed response.

Thanks

[REDACTED]

Data Protection / Compliance Officer  
Communications Branch

[REDACTED]