

# Freedom of Information

Volume 21, Issue 3

January / February 2025

## Headlines

- Enforcement activity, p.19
- Water company warnings, p.19
- ICO issues advice to local authorities facing financial restrictions, p.20

## Contents

Expert comment	2
FOI and EIRs — an end of 2024 review	4
AI and ESG — useful roles in Information Management, or new ingredients in acronym soup?	6
Recent decisions of the Commissioner and Tribunals	10
FOI news	19

## Three police bodies involved in latest spate of FOI enforcement activity

The Information Commissioner's Office has taken action against four public authorities, three of which are police bodies, for their continued failings to meet their obligations under the Freedom of Information Act.

City of London Police was issued with an [Enforcement Notice](#) for its FOI failings. Staffordshire Police, Dorset Police and Goldsmiths, University of London were each given [Practice Recommendations](#) setting out improvements they can make to better comply with their legal obligations under FOIA.

The action against City of London Police came about following the ICO's routine review of information about FOI performance published on the National Police Chiefs' Council website. In April 2024, the regulator noticed that the recent FOIA compliance statistics from City of London Police were absent so it wrote to the force to ask for them.

After a significant delay, the force responded that its average compliance rate in the financial year 2023/24 was 68%, which the ICO considers to be low.

The police body also had a large and rising backlog of older requests it had yet to respond to. From June 2023 to date, the ICO dealt with 12 complaints about City of London Police which involved timeliness issues.

The force said the issues had been caused by staffing challenges alongside an increase in the number and complexity of FOI requests.

The Enforcement Notice ordered the force to devise and publish an action plan within 30 days, which

[\(Continued on page 19\)](#)

## Water companies asked to publish sewage discharge data

The Information Commissioner's Office is calling on all water companies to proactively publish information relating to sewage discharges each month, saying that "transparency must be the default position" for water companies.

Water companies have a legal obligation to make available information about the environment available under the Environmental Information Regulations 2004 ('EIRs'),

both proactively and if requested by the public.

Early last year, UK Information Commissioner John Edwards wrote to 12 water companies, urging them to put transparency first and encouraging them to proactively publish the start and stop times of sewage discharges (see Volume 21, Issue 1, page 19).

The ICO says that so far, only two water compa-

nies, Yorkshire Water and South West Water, have committed to publishing this information each month. According to the ICO's [published note](#) of its interactions with one of these companies, Yorkshire Water, the challenges to publish the information were around data inaccuracies rather than technical difficulties.

[\(Continued on page 19\)](#)