

Our Ref: PW/TLR/FOI/0725/1354

13<sup>th</sup> August 2025

Stafford Education & Enterprise Park  
Weston Road  
Stafford  
ST18 0BF

Sent by email

Telephone: 0300 123 1461

Dear

**FOI/0725/1354**

**Your request for information under the Freedom of Information Act 2000**

Thank you for your request for information under the Freedom of Information Act 2000, received on the 9<sup>th</sup> July 2025. Firstly, we apologise for the delay in providing our response. We can now confirm that the Staffordshire and Stoke-on-Trent Integrated Care Board can provide the following information.

An anonymised copy of this response will be made publicly available on the ICB website.

You requested:

***Please treat this as a freedom of information request. I am interested in information relating to the system being placed in NHSE's financial recovery regime known as the investigation and intervention programme, which happened in 2024.***

***Please provide:***

***1) The full investigation report produced by the external partner(s) and supplied to the ICB.***

Following consideration of your request, we are writing to inform you that we are unable to provide the information requested. The investigation report you have requested was produced by external partner(s) and provided to the ICB in confidence. This information is therefore being withheld under Section 41(1) (Information provided in confidence) of the Freedom of Information Act 2000. Section 41 is an absolute exemption, which means there is no requirement to conduct a Public Interest Test. Disclosure of the report without the consent of the external partner would constitute an actionable breach of confidence and could give rise to legal proceedings against the ICB. ( For more information please see [Section 41 - Information provided in confidence | ICO](#))

***2) Any report covering the "interventions" to be made by the system (this includes any internal documents produced by the ICB, including risk registers and actions trackers, not just those produced by the external partner).***

We have interpreted this part of your request to include all related internal documents such as action trackers, risk registers, and any other documents relating to "interventions" following the investigation. Retrieving all of the information in scope would require identifying, locating, and extracting a very large number of emails and documents exchanged over several months between multiple public sector organisations and across various ICB teams. Given the broad scope, extended timeframe, and number of parties involved, it is clear that fulfilling this request would exceed the appropriate cost limit set out in Section 12(1) of the Freedom of Information Act 2000.

Under the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 ([The Freedom of Information and Data Protection \(Appropriate Limit and Fees\) Regulations 2004](#)), the limit for public authorities (such as the ICB) is £450, equivalent to 18 hours of staff time at a standard rate of £25 per hour.

In this case, the volume and distribution of potentially relevant information makes it evident that the work required would far exceed that limit. (For more information see [Requests where the cost of compliance exceeds the appropriate limit \(section 12\) | ICO](#))

As a result, we are not obliged to comply with this part of your request. This constitutes a refusal notice under Section 17(1) of the Act.

Should you require any further information or clarification regarding this response please do not hesitate to contact us. If you are dissatisfied with the response, you are entitled to request an internal review which should be formally requested in writing and must be within two calendar months from the date this response was issued.

### **To request an internal review**

You can request an internal review by contacting the Staffordshire and Stoke-on-Trent ICB FOI team by emailing; [staffsstokeFOI@staffsstoke.icb.nhs.uk](mailto:staffsstokeFOI@staffsstoke.icb.nhs.uk) or by post to the address at the top of this letter within 40 working days of the initial response.

If you are not content with the outcome of your internal review, you may apply directly to the Information Commissioner's Office (ICO) for a decision. Generally, the ICO cannot make a decision unless you have exhausted the Staffordshire and Stoke-on-Trent Integrated Care Board's FOI complaints procedure.

The ICO can be contacted at:

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

[www.ico.gov.uk](http://www.ico.gov.uk)

Yours sincerely

**Paul Winter**  
**Associate Director of Corporate Governance**