

**Chief Constable**  
Chief Constable Robert Carden  
Police Headquarters  
Carleton Hall Penrith,  
Cumbria  
CA10 2AU



19<sup>th</sup> December 2024

Dear

### **FREEDOM OF INFORMATION REQUEST – FOI 1063/24 Telephony Contracts**

I refer to your request for information which was received by Cumbria Constabulary on 26<sup>th</sup> November 2024. I note you seek access to the following information:

I refer to your request for information which was received by Cumbria Constabulary on 26<sup>th</sup> November 2024. I note you seek access to the following information:

1. *Contract Type: Maintenance, Managed, shared (If so, please state orgs)*
2. *Existing Supplier: If there is more than one supplier, please split each contract up individually.*
3. *Annual Average Spend:*
4. *Hardware Brand: The primary hardware brand of the organisation's telephone system.*
5. *Number of telephone users:*
6. *Number of Call Handlers on shift in the Control Room at any one time (Concurrent Users)*
7. *Contract Duration: please include any extension periods.*
8. *Contract Expiry Date: Please provide us with the day/month/year.*
9. *Contract Review Date: Please provide us with the day/month/year.*
10. *Application(s) running on PBX/VOIP systems: Applications that run on the actual PBX or VOIP system. E.g., Contact Centre, Communication Manager.*
11. *Telephone System Type: PBX, VOIP, Lync etc*
12. *Current issues/challenges – Potential areas of improvement that would add value?*
13. *Contract Description: Please provide us with a brief description of the overall service provided under this contract.*
14. *Go to Market: How where these services procured, please provide us with either the tender notice or the framework reference number. Please specify if procured through other routes.*
15. *Contact Detail: Of the person from within the organisation responsible for each contract full Contact details including full name, job title, direct contact number and direct email address.*

Your request for information has been considered and I can confirm that Cumbria Constabulary does hold the information you request, however I am not obliged to disclose all the information to you.

Section 17 of the Freedom of Information Act requires a public authority, when refusing to provide the information requested, to provide a notice which: -



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- States that fact,
- Specifies the exemption in question and
- States, if it would not otherwise be apparent, why the exemption applies.

The exemptions which I will be citing are:

**Section 31(1)(a)(b) Law Enforcement.**

**Section 40(2)(3) Personal Information.**

With regards to Questions 2,4,7 - 12

Section 31 is a prejudice based, qualified exemption and there is a requirement to describe the harm that will be caused if the exempt information is disclosed and to consider if the public interest considerations in favour of maintaining the exemption outweigh the considerations in favour of releasing the information.

I have set out my views on these issues below for your information.

Please Note: Previously, we would disclose this information, however, there has since been a key change in the stance taken, which is outlined in the exemption below. In this case, we consider that disclosure of the information would be likely to make the police service more open to malicious attacks on our computer systems. The risk of cyber-attacks, with the threat more likely since the war in Ukraine, therefore, posing an increased risk more recently.

### **Evidence of Harm**

Every effort should be made to release information under Freedom of Information. However, a FOIA response is considered to be a release to the world, as once the information is published, the public authority has no control over what use is made of that information.

The Police Service is charged with enforcing the law, preventing, and detecting crime and protecting the communities we serve. To achieve these objectives, all forces utilise Information Technology essential to front line services. Disclosure of specific IT tools, capabilities, or the lack thereof, in concert with any formal acknowledgement of strategic deficiency, would reveal intricacies of those systems, thereby highlighting vulnerabilities and compromising individual force information assurance.

Disclosure would also enable a geographical picture to be drawn up by those individuals who are intent on 'hacking' police systems; some of these individuals may include terrorists or terrorist organisations. In terms of duty of care, this would be detrimental to the public, as disclosure could assist a malicious actor by highlighting vulnerable forces and leaving those forces open to disruption of Information Technology systems; thus, compromising the effective delivery of operational law enforcement which in turn, is met by an increase of criminal offending.

### **Public Interest Test**

**Factors favouring disclosure** – Disclosing the details of certain ICT infrastructure, such as contracts/providers, would allow the public to be better informed on the health state and effectiveness and performance of each forces Information Technology platform, to taxpayers and satisfy audit requirements. This would provide transparency regarding the use of public funds in so much as highlighting that funds are being used correctly and appropriately, to ensure all Data Centres have adequate hardware and software, which results in the smooth running of force Technology systems.

**Factors favouring non-disclosure** - Whilst there is public interest in providing reassurance that police forces are appropriately and effectively dealing with any threats, posed against police force Technology capabilities, there is a strong public interest in safeguarding the



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welfare and safety of the public. If ICT systems were successfully attacked, it could lead to the loss of confidentiality, integrity, and availability of police information. Any disclosure has the potential to undermine current and future technological integrity, which in turn compromises Law Enforcement, and could jeopardise the daily running of policing activity. The risk of affecting the function of the police service would be much greater. In addition, by revealing ICT install and end user dates is intelligence to those who would wish to exploit possible vulnerabilities in the service. This may lead to the compromise of force IT systems which ultimately affects law enforcement capabilities and hinders the prevention and detection of crime or terrorism.

### **Balance Test**

The security of the country is of paramount importance and the Police service will not divulge any information, if to do so would undermine law enforcement and therefore compromise the work of the police service. Whilst there is a public interest in the transparency of policing and force ICT infrastructure, there is a very strong public interest in safeguarding the integrity of these systems in place.

The points above highlight the merits for and against disclosure of the requested information. Disclosure would undoubtedly provide a greater openness and transparency to the community at large regarding the Information Technology resources available to the police, and whilst there is always a public interest in the transparency of how a police force delivers effective law enforcement, there is a very strong public interest in safeguarding the intricacies and tactical capabilities of the software used when dealing with information.

I am aware of the immense importance for Public Authorities to demonstrate a level of openness and transparency, I believe protecting the tactical capability of Cumbria Constabulary must take precedence in this case. With this in mind, it is my decision that the balance of the public interest lies in the non-disclosure of the exempted information.

With regards to Question 15, the applicable exemption is **Section 40(2)&(3) – Personal Information.**

Under Section 40(2)(3) of the Act, public authorities are able to withhold information where its release would identify any living individual and breach the principles of the Data Protection Act.

I have applied this exemption because you have requested the name and contact details for the person responsible for the Constabulary's phone contracts. Personal and third party information cannot be released under the Freedom of Information Act. As a goodwill gesture I can provide our ICT department email address. [TM\\_servicedesk@cumbria.police.uk](mailto:TM_servicedesk@cumbria.police.uk)

A Freedom of Information request is not a private transaction. Both the request itself and any information disclosed are suitable for open publication. This is because under the Act, any information disclosed is released into the wider public domain, effectively to the world and not just to one individual. Therefore, when considering whether information is suitable for disclosure, a public authority is entitled to consider the effect of disclosure to any individual.

Section 40(2)(3) is an absolute exemption which means that there is no need to quantify the harm that may arise from the disclosure; neither is it subject to a public interest test.

Please see below for information to the remaining questions:

Answer: Question 1  
= Telephony Managed Service



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Answer: Question 3  
= Average Annual Spend - Telephony £205k  
= Average Annual Spend - Mobile Phones £120k

For your information and convenience, I have provided links to where you can access information relating to contracts and spending. Data is published on the OPFCC website via the transparency report, published up until the end of Tax Year 23/24. Archive transparency reports are also available.

[Contracts and Spending - Cumbria PFCC \(cumbria-pfcc.gov.uk\)](https://www.cumbria-pfcc.gov.uk)

Answer: Question 5  
= 2166 Telephone users

Answer: Question 6  
= The number of call takers on duty fluctuates across a 24hr period over 7 days and is based on anticipated demand, to ensure we have sufficient at peak times of contact.

Answer: Question 13  
= Telephony - Wide Area Network (WAN)  
= Mobile - Voice and Data

Answer Question 14  
= Telephony - ITT Framework RM6116  
= Mobile - Framework RM1045

Whilst every care has been taken in the retrieval of the information provided, please do not hesitate to contact us for clarification, if you do have any issues or queries relating to this data.

### Complaint Rights

Your attention is drawn to the attached sheet, which details your right of complaint. I would like to take this opportunity to thank you for your interest in Cumbria Constabulary.

