

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



17th February 2025

Dear

FREEDOM OF INFORMATION REQUEST – FOI 81/25 Data Brokers

I refer to your request for information received by Cumbria Constabulary on the 20th of January 2025. I note you seek access to the following information:

1. In each of the last five calendar years (2019, 2020, 2021, 2022, 2023), how much did the force spend on purchasing information from data brokers such as Experian, Equifax, Acxiom and others?

Please provide a full breakdown of spend with each provider in each calendar year. For example, in the following format:

Provider	2019	2020	2021	2022	2023
Experian					
Equifax					
Acxiom					
[insert others below]					

2. For what purposes does the force purchase information from data brokers?

Your request for information has been considered and I can confirm that Cumbria Constabulary does hold some of the information you request, and where held I will be citing **Section 31 (1)** in full for Question 1.

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

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.



EMPLOYER RECOGNITION SCHEME

BRONZE AWARD

Proudly supporting those who serve.



Section 31(1)(a) exempts information if its disclosure would or would be likely to prejudice the prevention and detection of crime.

As a qualified and prejudice-based exemption, I am required to evidence the harm and apply the public interest test.

Evidence of Harm

Every effort should be made to release information under Freedom of Information. However, a FOIA response is 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 information regarding the Constabulary's use of data brokers, or the lack thereof, would reveal intricacies of those used, 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 specific details of certain ICT infrastructure, such as the types of data brokers used would allow the public to be better informed on the health state and performance of each forces Information Technology platform. In addition, forces are required to demonstrate efficient services to local 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.

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 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 information regarding data brokers used by the Constabulary, this is intelligence to those who would wish to exploit 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



EMPLOYER RECOGNITION SCHEME

BRONZE AWARD

Proudly supporting those who serve.



work of the police service. Whilst there is a public interest in the transparency of policing and force infrastructure, including the Police 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. It is my decision that the balance of the public interest lies in the non-disclosure of the exempted information.

Please see the below response to the remaining question:

Question 2 - *For what purposes does the force purchase information from data brokers?*

Cumbria Constabulary use Personal, Financial and Credit Reference Agency Data for the purposes of Investigation, intelligence and personnel vetting.

Complaint Rights

If you believe your request has not been properly handled, or you are otherwise dissatisfied with the outcome of your request, you have the right to request an internal review.

In the first instance, please email freedomofinformation@cumbria.police.uk quoting the FOI reference number and explain why you are dissatisfied. Your complaint will be considered and a response will be provided to you after your complaint has been investigated.

If you remain dissatisfied following conclusion of the internal review, you have the right, under section 50 of the Freedom of Information Act, to complain directly to the Information Commissioner.

The address for the Information Commissioner can be found below:

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Complaints to the Information Commissioner can also be made online:

[Make a complaint | ICO](#)

I would like to take this opportunity to thank you for your interest in Cumbria Constabulary.



EMPLOYER RECOGNITION SCHEME

BRONZE AWARD

Proudly supporting those who serve.

