

Northamptonshire Fire and Rescue Service ICO Enforcement Notice: FOI Compliance

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**NORTHAMPTONSHIRE
FIRE & RESCUE SERVICE**

Executive Summary

On 5 August 2026, the Information Commissioner issued Northamptonshire Fire and Rescue Service with Enforcement Notice ENF0988401 following non-compliance with sections 1(1) and 10(1) of the Freedom of Information Act 2000. The Notice requires the publication of an action plan, supported by a lessons learned exercise identifying the root causes of delays and failings. Formalising measures to mitigate them, it also requires the requests within scope of the Notice to be dealt with lawfully by 5 February 2027.

Background and Context

Northamptonshire Fire and Rescue Service received 105 Freedom of Information requests in 2025, which is the confirmed demand data currently available. The Service experienced non-compliance with statutory FOI response timescales, and during this period a number of overdue historic FOI requests were closed without confirmation from applicants that the information was no longer required.

Requirements of the Enforcement Notice

Enforcement Notice ENF0988401 sets out the regulatory requirements Northamptonshire Fire and Rescue Service must meet following the Commissioner's findings of non-compliance with sections 1(1) and 10(1) of the Freedom of Information Act 2000.

The Notice requires the Service to publish an action plan supported by a lessons learned exercise, identifying the root causes of delay and the controls required to mitigate recurrence. It also requires all Freedom of Information requests within scope of the Notice to be handled lawfully by 5 February 2027.

Scope of this action plan

This action plan applies to Northamptonshire Fire and Rescue Service's response to ICO Enforcement Notice ENF0988400 and the Freedom of Information governance failures that led to it. It covers the immediate recovery work required to address overdue FOI requests within scope of the Notice, alongside the longer-term governance, people, process, records and demand-management controls needed to prevent recurrence and support sustained compliance with the Freedom of Information Act 2000.

Action Plan

Each action below is tracked against a named owner and target date, with progress reported through the Fire Information Management Board and escalated through SIRO into SLT where required.

1. Governance and Accountability

Ref	Finding / Lesson	Action	Owner	Target Date	Status
GA.1	Inadequate governance and decision-making controls resulted in a compliance-related decision that was inconsistent with the requirements of the Freedom of Information Act 2000	Introduce a formal FOI decision and escalation control for matters with statutory, regulatory or reputational risk, with escalation via the Fire Information Management Board and SIRO into SLT. Decisions will be supported by senior approval, legal or information governance review where required, and a decision log recording rationale, risks, approvals and review points.	SIRO	30/09/2026	In progress
GA.2	Strategic oversight and escalation arrangements were not sufficiently effective in identifying, challenging and preventing prolonged FOI non-compliance.	Strengthen governance reporting through the Fire Information Management Board, with escalation through SIRO into SLT where statutory timescales, regulatory commitments, key risks or blocked actions are at risk. Reporting will include backlog, statutory compliance, aged cases, key risks, decisions required and blocked actions. Escalation criteria will be documented and applied consistently.	SIRO	31/10/2026	In progress

2. People and Capability

Ref	Finding / Lesson	Action	Owner	Target Date	Status
PC.1	The FOI function did not have sufficient sustained capacity and resilience to manage demand, backlog recovery and statutory compliance consistently.	Strengthen FOI capacity and resilience by allocating an experienced decision-maker to oversee backlog recovery, dedicating two experienced FOI disclosure officers to case progression, and recruiting additional administrative support to improve throughput and support sustained compliance.	Strategic Lead for Information Assurance	01/12/2026	In progress
PC.2	Organisational understanding of FOI responsibilities, internal deadlines and the consequences of non-compliance was inconsistent across business areas.	Deliver targeted engagement and guidance for Information Asset Owners, senior leaders and key business areas to strengthen understanding of FOI responsibilities, internal deadlines, escalation routes and the consequences of non-compliance.	Strategic Lead for Information Assurance	30/11/2026	In progress

3. Systems, Technology and Process

Ref	Finding / Lesson	Action	Owner	Target Date	Status
ST.1	Current case management and workflow arrangements do not provide sufficient functionality to support effective oversight, workflow control, reporting, audit trails or automation of routine FOI processes.	Procure a dedicated case management system or significantly enhance the current in-house solution. To improve oversight of requests, workflow management, management information, business-area reporting, audit trails and automation of routine processes including registration, closure and template correspondence.	Strategic Lead for Information Assurance	31/12/2026	In progress
ST.2	Management information was not sufficiently comprehensive or timely to provide reliable oversight of FOI demand, backlog, ageing, compliance and risk.	Develop a routine FOI performance dashboard or reporting mechanism showing live requests, backlog, aged cases, statutory compliance, internal delays, business-area performance and cases requiring escalation. Reports will be submitted to the Fire Information Management Board, with escalation through SIRO into SLT where statutory timescales, regulatory commitments, key risks or blocked actions are at risk.	Strategic Lead for Information Assurance	31/12/2026	Not started

4. Records Management

Ref	Finding / Lesson	Action	Owner	Target Date	Status
RM.1	Historic and legacy FOI records were not consistently visible within routine reporting, creating a risk that overdue cases were not identified, tracked or progressed effectively.	Conduct a reconciliation exercise across current and legacy FOI records to confirm the full position on open, closed, reopened and historic overdue requests. Establish a repeatable reconciliation control so that all FOI cases in scope are visible in management reporting and recovery planning.	Strategic Lead for Information Assurance	30/09/2026	In progress
RM.2	FOI case records were not always maintained to a consistent standard, affecting the ability to evidence actions taken, decisions made and the basis for case closure.	Introduce minimum FOI record-keeping standards and periodic checks to ensure case records are complete, accurate and capable of supporting effective oversight and assurance.	Strategic Lead for Information Assurance	31/10/2026	In progress

5. Demand Management

Ref	Finding / Lesson	Action	Owner	Target Date	Status
DM.1	FOI demand and backlog were not managed	Implement a backlog recovery plan using ageing analysis, risk-	Strategic Lead for	30/09/2026	In progress

Ref	Finding / Lesson	Action	Owner	Target Date	Status
	through a sufficiently structured prioritisation model, contributing to prolonged delays and increased statutory risk.	based prioritisation and weekly progress review. The plan will identify Fire Service cases within the scope of the Enforcement Notice, allocate ownership, track milestones and escalate blockers that may affect delivery by the required statutory deadline.	Information Assurance		
DM.2	High-demand business areas were not consistently supported or held to account for timely FOI input, increasing the risk of internal delay.	Introduce targeted engagement with high-volume and high-risk business areas, including named points of contact, agreed internal response times, regular review of outstanding requests and escalation where deadlines are missed. Performance by business area will be reflected in routine reporting.	Strategic Lead for Information Assurance	30/11/2026	Not started



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