

5 August 2026

FOI Ref 23214

Request - You asked Staffordshire Police (SP) the following:

This request relates to the College of Policing Authorised Professional Practice (APP) on Vetting, specifically section 8.5.5.b (Non-disclosure), which states:

"Where a relevant matter is not disclosed, the vetting applicant should be contacted for further information, by telephone or where appropriate, email. An exploratory vetting interview may then be required. This is to ascertain whether the vetting applicant can provide a compelling explanation for the non-disclosure."

I request the following recorded information held by Staffordshire Police:

1. Please provide any local policies, standard operating procedures, guidance, decision-making documents, or instructions that supplement, interpret or depart from section 8.5.5.b of the College of Policing Vetting APP.
2. Please provide any recorded criteria, policy or guidance setting out the circumstances in which Staffordshire Police would decide not to contact a vetting applicant to seek further information regarding an apparent non-disclosure before making a vetting decision.
3. Please provide any recorded criteria or guidance identifying the circumstances in which Staffordshire Police may determine that an exploratory vetting interview or other opportunity to explain an apparent non-disclosure is not required.
4. If Staffordshire Police has any documented policy or guidance permitting a departure from the process described in section 8.5.5.b, please provide that document and identify the legal, policy or operational grounds relied upon.
5. For the period 1 January 2020 to the date of this request (or the longest period for which the information is readily available), please provide:
 - a. The total number of vetting applications where a relevant matter was identified as having not been disclosed by the applicant.
 - b. Of those cases, how many applicants were:
 - contacted by telephone to seek further information;
 - contacted by email to seek further information;
 - invited to or required to attend an exploratory vetting interview;
 - refused vetting without first being contacted by telephone or email to seek further information or being offered an exploratory vetting interview.
6. If the information is recorded, please provide the recorded reason categories for cases where vetting was refused without prior contact with the applicant regarding the apparent non-disclosure.

7. Does Staffordshire Police monitor or audit compliance with section 8.5.5.b of the College of Policing Vetting APP? If so, please provide any recorded audit reports, compliance data, management information or performance statistics relating to adherence to this requirement.

8. If any of the requested statistical information is not held, please confirm that no recorded information is held.

SP received your request on 03/08/2026 and have processed this under the Freedom of Information Act (FOIA).

SP's response to your enquiry is as follows:

In accordance with Section 17(1) of the Freedom of Information Act, this letter represents a refusal notice for this request.

The following exemption has been applied:

- Section 12(1) where the cost of compliance exceeds the appropriate limit.
- Section 12(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the prescribed limit'.

The above information has been withheld for the following reasons:

There is no method by which SP can readily retrieve information from local police systems to answer questions 5a and 5b of this request. For the period requested, there have been around 1,835 vetting records. To ascertain the number of vetting applications where a relevant matter was identified as having not been disclosed by the applicant, the record for each one would require a manual review. To extract this data would therefore require a very labour-intensive manual trawl through each record.

From dip sampling, it has been estimated that it would take approximately 30 minutes to review each record to answer this request, this would equate to over 917 hours. To achieve this task would therefore exceed the 18-hour time and cost threshold of the Freedom of Information Act by a considerable margin.

Advice and assistance

Section 16 of the Act places an obligation upon the Authority to provide advice and assistance, to comply with this obligation please see below.

Unfortunately, SP cannot suggest a way in which your request could be simplified or pared down to bring it within the confines of the time and cost threshold in order to answer question 5a and 5b. With regards to questions 1, 2, 3, 4, 6, 7 and 8 there is no information held. With regards to questions 2 and 3, each decision is recorded on the specific vetting review document for each individual case.

All Freedom of Information request responses are published on the SP website although personal details are not included.



Freedom of Information Request Appeals Procedure

1. Who Can Ask for a Review

Any person who has requested information from SP, which has been dealt with under the Freedom of Information Act, is entitled to complain and request an internal review, if they are dissatisfied with the response they received.

2. How to Request a Review

Requests for review of a Freedom of Information request must be made in writing within two months of the date of receipt of this email, and should be addressed to:

IAT@staffordshire.police.uk

Or by Post to:

Information Access Team
Staffordshire Police HQ
PO Box 3167
Stafford
ST16 9JZ

The reference number, date of the request and details of why the review is being requested must be included. Requests for review should be brought to the attention of the Information Access Team within two months of the Force's response to the original FOI request.

3. Review Procedure

Receipt of a request for review will be acknowledged in writing. The review will be conducted by a supervisor who is independent from the original Decision Maker. The Information Access Team will set a target date for a response. The response will be made as soon as is practicable with the intention to complete the review within 20 working days. In more complex cases the review may take up to 40 working days.

The independent Supervisor will conduct a review of the handling of the request for information and of decisions taken, including decisions taken about where the public interest lies in respect of exempt information where applicable. The review enables a re-evaluation of the case, considering the matters raised by the complaint.

4. Conclusion of the Appeal

On completion of the review the Independent Supervisor will reply to the appellant with the result of the review. If the appellant is still dissatisfied following the review they should contact the Information Commissioner to make an appeal. The Information Commissioner can be contacted via the following link:
<https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

Freedom of Information
Information Access Team