



STAFFORDSHIRE
POLICE

Our Ref: 23925
Your Ref: 23221

26th August 2026

Internal Review

Re: Request for internal review of response to application for information under the provisions of the Freedom of Information Act 2000, original request first notified to Staffordshire Police on 29th May 2026.

Staffordshire Police (SP) refers to the above request which is copied below:

This is a request under the Freedom of Information Act 2000.

Please provide the following data broken down by year, capturing the snapshot date of 1st January for each year from 2016 to 2026 inclusive (or the closest available operational date to that window):

1. Staffing & Caseload Tiers

A) The total Full-Time Equivalent (FTE) headcount of dedicated police officers and staff (e.g., MOSVO, SOMU, or VISOR teams) whose primary, dedicated role is the active community management and supervision of Registered Sex Offenders (RSOs).

B) The total number of Registered Sex Offenders (RSOs) actively managed by your force on that snapshot date.

2. Enforcement and Outcomes

For each full calendar year prior to the snapshot dates (i.e. 1st January to 31st December for each year from 2016 through 2025 inclusive), please provide:

A) The total number of recorded offences under HO Code 066/17 (Breach of Notification Requirements / failure to comply with notification requirements under Section 91 Sexual Offences Act 2003), and the number of those offences that resulted in a Charge / Summons outcome.

B) The total number of recorded offences under HO Code 068/08 (Breach of a Sexual Harm Prevention Order / SOPO), and the number of those offences that resulted in a Charge / Summons outcome.

Precedent Note on Section 31:

Please note that multiple territorial police forces have already fulfilled this exact request in full—including providing the aggregate FTE headcount for Question 1A—without citing statutory exemptions under Section 31 (Law Enforcement). As this request seeks a single, force-wide aggregate figure rather than local unit rotas or operational deployments, there is clear precedent that disclosing this high-level metric does not prejudice law enforcement or public safety.

Advice and Assistance (Section 16):

If providing the full 10-year historical dataset for any specific question exceeds the statutory cost limit under Section 12, please prioritize the data starting from the most recent year (2026) and work backwards as far as the cost limit allows, rather than issuing a blanket refusal.



You have requested an Internal Review which is copied below:

I am writing to request an internal review of Staffordshire Police's handling of my FOI request 'SOMU / PPU Team Size V number of SOs over time V recorded crimes and charges for breaches of SHPO and Notification Requirements'.

1. Incomplete Disclosure: Question 1B (Historical RSO Figures)

The original request asked for data broken down by year, capturing the snapshot date of 1st January for each year from 2016 to 2026 inclusive.

Your response for Question 1B provided a single aggregate figure (1654). It did not specify which snapshot date this single figure represents, nor did it provide the historical annual figures for the remaining years requested.

* Request: Please provide the full annual snapshot figures for the total number of actively managed Registered Sex Offenders (RSOs) on 1st January for each year from 2016 through 2026 inclusive.

2. Challenge to Exemption: Question 1A (FTE Staffing Headcount)

I request an internal review of the decision to withhold the Full-Time Equivalent (FTE) headcount of dedicated sex offender management officers and staff under Section 31(1)(a)(b) (Law Enforcement).

Grounds for Review:

1. High-Level Aggregation vs. Operational Detail:

Section 31 requires a real and demonstrable risk of prejudice to law enforcement functions. Question 1A seeks a single, force-wide aggregate FTE figure for dedicated offender management staff. It does not request local division breakdowns, shift rotas, covert capabilities, or officer deployments. Disclosing a single force-wide annual metric does not expose specific operational vulnerabilities.

2. Public Interest in Resource Scaling:

Your response indicates a current managed RSO population of 1,654 offenders. There is a compelling public interest in knowing whether police resources and dedicated staffing levels have scaled appropriately alongside this cohort over time.

3. Inspectorate & MAPPA Practice:

Aggregate staffing headcounts for specialist policing units are routinely scrutinised in high-level inspectorate reviews (such as HMICFRS reports) and national MAPPA assessments without compromising public safety. High-level FTE figures demonstrate institutional accountability rather than operational tactics.

4. Sector Precedent & Peer Force Consistency:

Multiple other territorial police forces across England and Wales have already fulfilled this exact request in full—including providing aggregate FTE staffing headcounts—without citing Section 31 exemptions. Proof and links to these public disclosures from peer forces can be provided upon request. This widespread disclosure demonstrates that releasing a single, force-wide FTE figure does not create operational prejudice.



I ask that you provide the missing annual breakdown for Question 1B and re-examine the public interest balance regarding Question 1A to release the aggregate FTE headcount figures.

SP Response

A review has been completed; SP will address the issues raised as follows:

Challenge to Exemption: Question 1A (FTE Staffing Headcount)

Section 31 requires a real and demonstrable risk of prejudice to law enforcement functions. Question 1A seeks a single, force-wide aggregate FTE figure for dedicated offender management staff. It does not request local division breakdowns, shift rotas, covert capabilities, or officer deployments. Disclosing a single force-wide annual metric does not expose specific operational vulnerabilities.

SP confirms that the application of the s31 exemption outlined in the response to this question was fully justified, and that the explanation and rationale for its application was conveyed clearly and unequivocally.

Incomplete Disclosure: Question 1B (Historical RSO Figures)

The original request asked for data broken down by year, capturing the snapshot date of 1st January for each year from 2016 to 2026 inclusive.

Your response for Question 1B provided a single aggregate figure (1654). It did not specify which snapshot date this single figure represents, nor did it provide the historical annual figures for the remaining years requested.

The figure disclosed in the original response 1654, was a 'snapshot' of RSO's that were managed by SP in the community as of 6th August 2026.

Please note that historical annual figures are not held, and there is no readily retrievable way of obtaining this information.

Please be advised that all FOI requests and response letters are published on the Staffordshire Police website although personal details are not included.

If you are not content with the outcome of the review, you may apply directly to the Information Commissioner to investigate. The Information Commissioner can be contacted at:

<https://ico.org.uk/make-a-complaint/foi-and-eir-complaints/foi-and-eir-complaints/>

Information Access Team Management

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