

8 June 2026

FOI Ref 22965

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

1. Please provide copies of all policies, procedures, standard operating procedures, guidance documents, workflow documents, and operational instructions relating to:

- Child Sex Offender Disclosure Scheme (CSODS)
- Sarah's Law applications
- Disclosure decision-making
- Applicant interviews
- Risk assessments
- Disclosure determinations

Please provide:

1. The version(s) in force on **1 March 2026**; and
2. The current version(s) in force at the date of your response.

Where documents have been amended, replaced, superseded or withdrawn since 1 February 2026, please provide both versions and indicate the date of change.

2. Please provide copies of all policies, procedures, standard operating procedures, guidance documents and operational instructions relating to:

- CSODS applications involving another police force
- Applicants residing in Staffordshire where the child resides outside Staffordshire
- Inter-force safeguarding coordination
- Inter-force information requests
- Ownership and management of CSODS applications
- Transfer of responsibility between police forces

Please provide:

1. The version(s) in force on **1 March 2026**; and
2. The current version(s) in force at the date of your response.



Where documents have changed since 1 February 2026, please provide both versions and details of the amendments.

3. Please provide copies of all policies, procedures, guidance documents and operational instructions relating to:

- Secure handling of CSODS applications
- Transmission of CSODS information by email
- Sharing CSODS information with external police forces
- Sharing CSODS information with safeguarding agencies
- Handling information classified as OFFICIAL-SENSITIVE
- Data minimisation requirements
- GDPR considerations when sharing safeguarding information

Please provide:

1. The version(s) in force on **1 March 2026**; and
2. The current version(s) in force at the date of your response.

Where documents have changed since 1 February 2026, please provide both versions and details of the amendments.

4. Please provide copies of any policies, guidance, performance measures, service standards or operational expectations relating to:

- Initial contact with applicants
- Applicant interviews
- Disclosure decisions
- Timescales for progressing CSODS applications
- Escalation procedures where timescales are not met

Please provide:

1. The version(s) in force on **1 March 2026**; and
2. The current version(s) in force at the date of your response.

5. Please provide copies of any:

- Audit procedures
- Quality assurance processes



- Compliance reviews
- Supervisory review procedures

used in relation to CSODS applications.

Please provide:

1. The version(s) in force on **1 March 2026**; and
2. The current version(s) in force at the date of your response.

6. Please provide copies of:

- Organisational learning documents
- Lessons learned documents
- Internal reviews
- Practice reviews
- Improvement plans
- Procedural change notices

produced between **1 January 2025 and the date of your response** relating to:

- CSODS applications;
- Sarah's Law disclosures;
- Inter-force CSODS coordination;
- Disclosure decision-making;
- Safeguarding processes associated with CSODS applications.

7. For each calendar year 2021, 2022, 2023, 2024 and 2025:

How many CSODS / Sarah's Law applications were received by Staffordshire Police?

8. For each calendar year 2021, 2022, 2023, 2024 and 2025:

How many disclosures were made under CSODS?

9. For each calendar year 2021, 2022, 2023, 2024 and 2025:

How many CSODS applications resulted in no disclosure?



10. Relating to CSODS Applications Does Staffordshire Police record:

- Date application received
- Date applicant interviewed
- Date disclosure decision made

Yes or No?

11. Regarding CSODS applications Does Staffordshire Police have any internal performance target relating to:

- Initial contact
- Applicant interview
- Disclosure completion

12. Relating to CSODS applications Does Staffordshire Police monitor compliance with national CSODS guidance?

If yes:

- What metrics are monitored?
- How frequently are they reviewed?

13. Does Staffordshire Police record whether a CSODS application involves:

- A child residing outside Staffordshire
- Another police force
- Multi-agency safeguarding involvement

Yes or No?

14. Does Staffordshire Police record whether a CSODS application involves:

- A child residing outside Staffordshire
- Another police force
- Multi-agency safeguarding involvement

Yes or No?

If such a marker exists:

Please provide the number of CSODS applications recorded as involving another police force during 2021, 2022, 2023, 2024 and 2025.



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15. Please provide any policy or guidance describing:

- Which force retains ownership of a CSODS application
- Circumstances where ownership transfers
- Responsibilities of the originating force

16. Has Staffordshire Police conducted any internal audit, review or quality assurance exercise relating to CSODS applications since January 2024?

If yes:

Please provide the title and date.

17. Has Staffordshire Police identified any failures, recommendations or lessons learned relating to CSODS applications since January 2024?

If yes – please provide as much detail as possible

SP received your 17 requests on 04/06/2026 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 14(2) Where a public authority has previously complied with a request for information which was made by any person, it is not obliged to comply with a subsequent or identical or substantially similar request from that person unless a reasonable interval has elapsed between compliance with the previous request and the making of the current request.

SP are not providing the information you have requested as SP have determined that your requests are vexatious under Section 14(2) Vexatious Requests.

The Information Commissioner's guidance on the subject makes it clear that Section 14(2) may be applied where a request, or its impact on a public authority, cannot be justified.

The key question to consider is whether the request is likely to cause a disproportionate or unjustified level of disruption, irritation or distress based on the impact of the authority, weighed against any evidence about the purpose and value of the request. SP are also entitled to consider the context and history of the request where it is relevant.

On 04/06/2026, you submitted 17 requests on the same topic regarding the Child Sex Offender Disclosure Scheme. You had previously submitted an FOI request (22902) on the same topic to which a section 12

FOI response was provided to you on 04/06/2026. This response included advice and assistance under section 16 of the FOI Act, offering a refinement as to what could be provided.

The bombardment of 17 requests within minutes of each other, is causing a disproportionate and unjustified level of disruption on the department along with irritation and distress to staff members. This course of action shows a level of intransigence by rejecting the attempts of SP to assist and advise and showed no willingness to engage.

For the above reasons, SP have concluded that your requests are vexatious within the terms of Section 14(2) of the Act.

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

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.

As per your original request (22902), SP would be able to answer questions 5 and 6.

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



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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