



Domestic Violence Disclosure Scheme / Child Sex Offender Disclosure Scheme Policy (1256/2026)

Abstract

This policy relates to the handling of Domestic Violence Disclosure Scheme (DVDS) and Child Sex Offender Disclosure Scheme (CSODS) applications within Sussex Police and includes elements outside of national guidance that are specific to working practices within Sussex Police.

Policy

1. Introduction

1.1 The Domestic Violence Disclosure Scheme (DVDS) and the Child Sex Offender Disclosure Scheme (CSODS) are safeguarding mechanisms enabling the Police to lawfully and proportionately disclose information about a person where it is necessary to protect a potential victim from harm. The schemes support individuals, or those able to safeguard them, in making informed choices about safety and relationships by providing relevant information about an individual's history of abusive or harmful behaviour.

Both schemes operate within the [Data Protection Act 2018](#), [Human Rights Act 1998](#), and the common law policing duties relating to the prevention of crime and the protection of life. The [Domestic Violence Disclosure Scheme Statutory Guidance](#), issued under [Section 77 of the Domestic Abuse Act 2021](#), requires forces to have regard to the guidance, with any deviation requiring clear and defensible rationale.

Neither scheme creates an entitlement to receive Police information. Disclosures must meet defined thresholds and are limited to information that is necessary, proportionate, and directly relevant to safeguarding. Individuals receiving disclosures are not obliged to act upon them, though Police must ensure support and wider safeguarding measures are considered.

This policy explains how national guidance is implemented operationally within the Force area, defines roles and responsibilities, and outlines any local variations in process or practice.

This policy and procedure apply to all Sussex Police Officers and Staff.

2. Scope

2.1 Whilst DVDS and CSODS are intended to deal with very different risks, the legislative considerations, principles and practicalities of the two schemes are almost identical. DVDS however is statutory and CSODS is not. The risks posed to vulnerable people will often overlap both schemes, for these reasons this policy covers both DVDS and CSODS processes.

This policy is not intended to replace the direction of the national guidance or Authorised Professional Practice (APP) for either scheme but compliment them. Police Officers and Staff working on specialist teams involved in managing DVDS and CSODS Occurrences must familiarise themselves with these documents, as they contain significant further detail, guidance and context.

This policy focuses on core processes and decision points within the schemes, where specific action must be taken.

3. Policy Statement

3.1 The aim of this policy is to ensure that Sussex Police:

- Provide a timely, consistent, and high-quality response to all DVDS and CSODS Occurrences:
- Provide anyone identified as vulnerable (or someone best placed to safeguard them) with the right type and depth of information to support informed understanding of the subject's behaviour and enable the best possible decisions about safety and relationships:
- Ensure that DVDS "Right to Ask", DVDS "Right to Know", and CSODS applications are managed in accordance with statutory guidance, national policy, and Authorised Professional Practice (APP), and understand and mitigate any risks arising from deviation:
- Provide explanation, confidence, and transparency to the Sussex public regarding how DVDS and CSODS applications are processed.

Procedure

1. Terminology

1.1 The national guidance for DVDS labels the key people involved as 'A', 'B' and 'C'. To ensure operational clarity, more simplified language must be used by those dealing with DVDS and CSODS Occurrences.

- **Person at Risk (PAR) or Recipient** - Referred to in the DVDS guidance as 'A' – this is the person who is potentially at risk and will normally receive any potential disclosure, unless there is a reason to provide it to someone best placed to safeguard them:
- **Subject** - Referred to in the DVDS guidance as 'B' – this is the person potentially posing the risk:

- **Applicant** - Referred to in the guidance as 'C' – this is the person making the request, if it is different from the recipient.

Although CSODS guidance does not use A / B / C terminology, applying the same simplified terms (PAR, Subject, Applicant) across both schemes promotes consistency and operational clarity.

2. Entry Methods

2.1 Both DVDS and CSODS have two entry methods:

- **Right to Ask**– where a request for information is made by someone outside of the Police. This may be the recipient themselves, or the applicant could be a relative, friend or professional.
- **Right to Know** – are entirely generated by police proactively identifying that a potential risk exists.

The type of entry method must be identified to enable correct Niche recording, and the fact Right to know Occurrences generally carry more risk. This is due to the recipient potentially being unaware that a risk exists, which must be a key consideration when managing the process.

Right to Ask applications will be accepted via online form on the Sussex Police website, through FCCCD and via direct approach to any Police Officer or Staff member with public contact.

If a Police Officer or Staff identifies a potential risk relevant to DVDS / CSODS, they must raise a Right to Know Niche Occurrence. A Right to Know can be triggered by any new information, such as an arrest, intelligence such as a new relationship forming, Multi-Agency Risk Assessment Conference (MARAC) / Multi-Agency Public Protection Arrangements (MAPPA) discussions, or third party information.

For CSODS, requests must relate to concerns about a specific individual who may pose a risk to a specific child.

All requests must be accepted and recorded on Niche, even if they later fail eligibility criteria.

3. Compliance with Legislation

3.1 All information handling, processing and sharing for DVDS and CSODS must be compliant with the [Human Rights Act 1998](#), the [UK General Data Protection Regulation](#) (UK GDPR) and [Data Protection Act 2018 Part 3](#), as outlined in the national guidance.

For law enforcement purposes, processing must fall under our statutory functions where processing is necessary for the performance of a task carried out for that purpose by a competent authority. The definition of statutory function for 'law enforcement purposes' is 'purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security.

In addition, the police may share Sensitive data where the processing is strictly necessary for the law enforcement purpose and the processing meets at least one of the conditions in [Schedule 8](#), of the Data Protection Act 2018.

UK GDPR applies only to non-law enforcement police functions where processing will likely fall under Public Task.

The national guidance for DVDS is placed on a statutory footing by [Domestic Abuse Act 2021 Section 77](#). This means if Sussex Police deviate from the direction of this guidance there must be good reason.

Unlike DVDS, CSODS is not statutory, however processing must still fall under our statutory functions where processing is necessary for the performance of a task carried out for that purpose by a competent authority. Any disclosure must be within the existing legal framework and have due regard to the established case law, the Human Rights Act 1998, Part 3 of the Data Protection Act 2018 and where applicable, the UK General Data Protection Regulation.

Sussex Police will comply with the national guidance for both DVDS and CSODS wherever possible. Scenarios or identified risk may justify deviation. Public safety will be the utmost priority above complying with guidance, so long as any proposed action is lawful, proportionate and justified.

Sussex Police have rationalised one specific situation where there will be a general deviation from the national guidance, relating to delivery in person. The national guidance states that both delivery of a disclosure and notification that there is nothing to disclose will be given in person. Sussex Police will permit the use of delivery via digital means for DVDS and CSODS, so long as specific conditions are met (see Method of Delivery).

All other deviations from the national guidance must be recorded on the Niche Occurrence along with a rationale.

4. Timescales

4.1 All DVDS and CSODS Occurrences must be completed within **28 days**. The only exception to the 28-day limit, is where there are extenuating circumstances.

Extenuating circumstances are not defined but would need to be something that seriously impacts the ability to either locate the recipient or determine if a disclosure is necessary. For example, attempting to gather information via Interpol from another country where it is likely to be a prolonged process. A plan must be created for dealing with any risk caused by the delay and notifying the recipient / applicant (where appropriate).

For Right to Ask requests specifically:

- Suitable checks must be completed within **24 hours of recording** to identify immediate risk or action required such as breaches of orders, or wanted persons etc. At a minimum this must include a primary review of Niche and Police National Computer (PNC).

- A face-to-face meeting (or via Goodsam) should be held at the earliest possible opportunity; best practice is within **10 days** from the Occurrence being raised (see face-to-face meeting). This is not a statutory requirement.

The Force aspiration is that the research element of DVDS and CSODS Occurrences will be completed within **14 days**, to allow **14 days** to locate the recipient and make delivery arrangements.

For the purpose of recording timings, a Right to Ask DVDS or CSODS application will be deemed to have started on the day that the request is made. Right to Know will begin on the day that the potential requirement for disclosure is identified. Both must be recorded on Niche.

DVDS and CSODS Occurrences will be deemed to have concluded on the date that the disclosure is successfully given, is deemed not to be necessary or is made dormant. Where the disclosure is refused the date of conclusion will be the last date that contact was made with the recipient regarding the disclosure.

5. Application / Creation Stage of the Process

5.1 Risk assessment

All DVDS and CSODS Occurrences will be risk assessed upon first receipt / creation to establish if there is any immediate risk that needs to be addressed and/or any requirement for deployment.

Risk assessments must be recorded on the Occurrence Enquiry Log (OEL), either using the DVDS template 'Review / Decision making', for CSODS a Safeguarding template 'Stage 3 Risk Assessment' or a minute entry. Tools such as the [National Decision Model \(NDM\)](#) and the APP principles of risk should be used where appropriate.

Any risk or requirement for deployment will be dealt with in line with the appropriate policy. For example, the Domestic Abuse Policy (516) if the applicant raises unrecorded Domestic Abuse (DA) matters.

If at any stage something is identified that is either high risk or time critical, it must be specifically recorded on the OEL.

- **High risk** means either a serious or life-threatening issue has been identified. For example, the subject is a registered sex offender and is identified to be living in a residence with children. However, it may not necessarily relate solely to the risk posed by the subject. It could be due to recipient related issues and vulnerabilities, such as mental health, substance abuse or learning difficulties. Where it is identified that the recipient may not be able to fully understand the risk or have capacity to make decisions to protect themselves:
- **Time critical** means that there is a significant event occurring before the 28-day period has elapsed for completing the application. For example, the people involved are moving in together or are planning on leaving the country together.

The person responsible for identifying the high risk / time critical issue must ensure that it is raised appropriately. A plan must be created to ensure that the matter is progressed appropriately and recorded on the OEL.

The Officer / Staff member designated as the Officer in the Case (OIC) will be responsible for ongoing risk assessments.

5.2 Niche Recording and Allocation

For an application to be made (either in person / telephone or online) it is essential that the name and Date of Birth (DOB) of the subject is known. Without this information no application can be completed, and the risk cannot be assessed or managed.

5.3 For applications processed by the Force Contact, Command and Control Department (FCCCD).

A Computer Aided Dispatch (CAD) must be created using the opening code: 540 ADMIN, Title: DVDS, or CSODS. If the report is received via Single online Home (SOH), staff must check the application is completed correctly and contact the informant for any missing information. Police Staff must save the PDF attachment of the form as a word document and save it to the Niche Occurrence under the report tab. If the report is made via telephone / in person, then staff are to use the templates provided on the Niche OEL to record the information as it is requested.

Once completed, Police Staff are to push the CAD to Niche and correctly record the application on Niche. This involves recording the dispatch type as 'Admin,' the Occurrence type as either DOMESTIC VIOLENCE DISCLOSURE SCHEME (RIGHT TO ASK) or DOMESTIC VIOLENCE DISCLOSURE SCHEME (RIGHT TO KNOW, or CHILD SEX OFFENDER DISCLOSURE SCHEME.

All people must be recorded currently on the Niche, including the person making the application (Disclosure – Requester), the subject of the request (Disclosure – Subject), the adult at risk (Concern for safety) and all involved children must be recorded too. The address must be correctly recorded and show the person at risk resides in Sussex.

If they do not reside in Sussex, a transfer of the CAD must be made to the force where the person at risk resides.

The OIC must be recorded as SXP DART Disclosures for DVDS and CSODS applications.

At this point the Force Research Bureau (FRB) must be tasked to complete the research, using a Niche task. In due course Disclosure and Referral Team (DART) will hold Police National Database (PND) licenses and be trained to use the database, at this point FCCCD will be informed by DART supervision that these tasks are no longer necessary. Until that point, this process must still be completed. FRB only complete PND checks, if an urgent PNC check is required then Police Staff must use their usual methods of obtaining these.

Police Staff must then complete the Threat, Harm, Risk, Investigation, Vulnerability and Engagement (THRIVE) (if new offences or risk identified, duplicate CAD and follow DA process) and then pass CAD to ContactTL queue.

Team Leaders and Sergeants, upon receiving the DVDS CAD on ContactTL must check the information on the CAD, check THRIVE, check the application is on the Niche OEL. If no risk is identified, they must endorse the CAD to this effect and then can close the CAD.

FRB will complete their checks and email them on to the DART. There is no need for any further FCCCD action at this stage unless FRB identify concerning information about the individual not previously known or assessed. If they do have concerns, they will contact their contact team leader directly to make them aware.

5.4 For applications processed by all staff

All applications will be recorded on Niche as stand-alone Occurrences. Occurrences must be created as soon as soon as practicable after the request is made (Right to Ask) or the requirement is identified (Right to Know) and in any case before the end of duty.

Occurrences must be given the correct DVDS / CSODS Occurrence type, **no** Stats classification should be inputted.

All relevant people and addresses must be linked to the Occurrence as soon as they are identified. Particular attention must be given to identifying and linking any relevant children. Full names and dates of birth must be recorded, to prevent new entities being recorded on Niche which delays the research of subjects.

All Right to Ask Occurrences for DVDS and CSODS will be tasked on Niche to the Disclosure and Referral Team (DART).

Right to Know Occurrences created by Domestic Abuse Caseworkers (DACWs) as a direct result of a MARAC will retain these Occurrences in their name and be the OIC.

Right to Know Occurrences created by any other Police Officer or Staff member can be tasked to DART, unless the creator of the Occurrence is sufficiently experienced in completing these applications and this is endorsed by their line manager. They must adhere to this policy at all stages of the application.

At the point of creation of the Occurrence, a task to FRB must be initiated to begin the out of force research of the subject, until such a point as the DART have PND licenses and training to use the database. If the application is being progressed by a person who does not work in DART or does not have a PND license and training to use the database, then FRB should be tasked to complete that research at the earliest stage. FRB are only responsible for obtaining PND checks for DVDS and CSODS disclosures. PNC checks must be completed via a Mobile Data Terminal (MDT).

DART have overall responsibility for the management of the process of all Right to Ask, Right to Know and CSODS applications.

For Occurrences requiring allocation for progression, DART will be responsible for allocation to the correct team, based on the following principle:

- If the DVDS application relates to a PAR or subject who is a current MARAC nominal, a DACW from that division will be responsible for research and disclosure decision making on that Occurrence:

- If the DVDS application relates to a subject that is a Registered Sex Offender (RSO) and is actively managed by Violent and Sex Offender Register (ViSOR), then the managing ViSOR team will be responsible for research and disclosure decision making on that Occurrence:
- For all other Occurrences, DART will be responsible for research and decision making.

DVDS and CSODS Occurrences will be managed in the same manner as crime workloads, with general decisions, reviews and direction being made by the OIC and where necessary appropriate supervisors on the responsible team. There are specific rank requirements for disclosure decisions (see Decision to Disclose).

All relevant updates must be included on the OEL as soon as possible. At the end of duty, OELs must be left with a level of detail that would allow an oncoming Police Officer or Staff to understand the current situation, risks, and stage of the process (particularly prior to leave or rest days).

Only DART will finalise DVDS / CSODS Occurrences, unless the DART Sergeant is away from work for a period of time such as sickness or leave, and then one of the divisional DA Detective Inspectors (DIs) will be responsible and should be tasked. All Occurrences will be Niche tasked to DART when fully complete and ready for filing.

5.5 Right to Ask Face to Face meeting

This is not national guidance, but a Sussex Police requirement to support verification and risk assessment. The face-to-face meeting does not need to be done in person; it can be done via digital technology (Goodsam). The Police Officer or Staff responsible must determine which method is best for the applicant, based on the individual circumstances.

The face-to-face will be used to gather enough information to aid the research process. A non-exhaustive list would include establishing:

- The identity of the applicant
- The nature of the relationship
- The reason for the application
- What the applicant already knows about the subject's history and any risk posed by them

Sufficient detail must be gathered to ensure that the subject's identity can be confirmed. This may include establishing all given names, aliases, identify document details, and potentially a photograph if available. It is imperative to ensure the subject is not present or monitoring this interaction, and the use of Goodsam is appropriate in this instance to do so.

If enough information has been gathered during the initial application, then there is no requirement to hold a face-to-face. This is a decision to be justified by the Police Officer or Staff responsible.

If something high risk or time critical has been identified, it is acceptable not to delay progressing the application to complete a face-to-face. The Police Officer or Staff responsible must still ensure that all necessary prerequisites and data protection requirements are complied with and that subject identity is confirmed.

5.6 Subject in custody

Should a requirement for a DVDS / CSODS become apparent when a subject is in Sussex Police custody, all efforts will be made to expedite the process to ensure that a disclosure can be provided to the PAR while the subject is in custody.

Consideration must be given to providing an initial threshold disclosure if it is not possible to provide a full disclosure.

6. Research Stage of Process

6.1 Researcher role – Right to Ask

All Right to Ask applications will be progressed by DART, unless allocated out by the DART supervisor with a clear rationale such as previously documented under 'Application / Creation stage of process.' (MARAC nominal, RSO actively managed by ViSOR).

At the point of creation of the Occurrence, a task to FRB must be initiated to begin the research of the subject, regardless of who is retaining the Occurrence until such a point as the DART have PND licenses and training to use the database. This tasking is for PND checks to be completed, and then sent back to the DART inbox, where DART staff then add to the Niche Occurrence. OICs must utilise their MDTs to obtain PNC checks.

For Right to Ask applications that sit with DACW or ViSOR, the OIC is responsible for conducting research using Niche, PNC and PND. If the application meets criteria to progress, then the application is tasked to the DA DI for review / authorisation in the case of DACWs, or to the ViSOR DI in the case of those held by ViSOR.

For Right to Ask applications that sit within DART the following internal process will be adhered to:

The triage team complete initial risk assessment of the application, assessing for indicators such as Serial Domestic Abuse Suspect (SDAS) marker, RSO flag, and other factors that enable them to grade the application as standard, medium or high.

The triage team then complete the face-to-face meeting with the applicant, as documented in the previous section under 'Application / Creation stage of process'.

At this stage it should be identified whether the application meets the criteria to progress. If it does not meet criteria then the applicant must be updated, and a full rationale completed on the Niche and the matter finalised using the correct Niche template. (Any disclosed offences to be dealt with as standard processes and policy direct, and if there is

an identified safeguarding need this is to be recorded on the Niche along with a plan to mitigate any risk.)

If the application meets criteria to progress, then the application is tasked to the DART supervisor to review.

Applications that are 'nothing to disclose' (NTD) based on triage are allocated for the disclosure to be given, and then subsequently filed.

Applications where there are identified concerns, are then tasked to the research and review team for full research to be conducted and a disclosure written for the DART supervisor to review.

The research will consist of Niche, PNC and PND.

National guidance will be adhered to in relation to what information is proportionate, necessary and legal to disclose, considering all the circumstances of the application and individuals involved.

In the event that FRB are unable to complete the PND research in a reasonable time period, certainly no longer than 14 days then this will be escalated to the Public Protection Command Team, and the DART will complete initial research on Niche and PNC, using MDTs to obtain PNC records and base a disclosure on that information.

Upon receiving the PND research, a further disclosure can be given if it is assessed as necessary, proportionate, and legal. This decision should be balanced with what information has already been disclosed, and whether it adds any value to the original disclosure.

For CSODS, DART will complete all research and if there is nothing to disclose, they will complete the entire application. Where there is something to disclose, once the research is complete the application will be tasked to the Iris team that cover the geographical area where the person at risk resides to complete a face-to-face disclosure.

6.2 Researcher role – Right to Know

At the point of creation of the Occurrence, a task to FRB must be initiated to begin the research of the subject, regardless of who is retaining the Occurrence until such a point as the DART have PND licenses and training to use the database. This tasking is for PND checks to be completed, and then sent back to the DART inbox, where DART staff then add to the Niche Occurrence.

The OIC of the Right to Know, either a DACW or any other Police Officer or Staff who is sufficiently experienced in completing these applications and this is endorsed by their line manager will be responsible for completing their own research using Niche, PNC and PND and can follow the national guidance on what should be disclosed. OICs must utilise their MDTs to complete PNC checks on subjects and can task FRB for PND checks to be obtained.

6.3 Right to Ask, Right to Know and CSODS research

Suitable research must also be carried out into the recipient (and applicant if applicable and necessary), to ensure due diligence around fairness and impartiality, and the balance of risk between the parties, which may impact necessity for disclosure.

The research document and the disclosure document must be used for all Occurrences, they must be attached to Niche as soon as they are begun and should be updated as research progresses.

The researcher will be responsible for recording all relevant information in the research document before composing a proposed form of words in the disclosure document.

Researchers must aim to have the research completed within 14 days from when the Right to Ask request was made or when the Right to Know was raised. A rationale must be provided if this is not achievable. In any case the researcher must be prepared for the 14-day review, being able to explain what research has been carried out, what tasks are remaining, highlighting identified risks, indicating whether a disclosure is likely to be required and whether threshold has potentially been met to disclose.

6.4 Thresholds

The following threshold will be applied to determine when research should be ceased and disclosure progressed, to ensure that research is carried out to a suitable level to achieve the aim, whilst not being so excessive as to delay disclosures and breach subject rights.

Disclosable information has been identified AND

It is reasonable to conclude that it fully achieves the aim in a lawful, fair and proportionate manner and that further research or disclosure would not be necessary or proportionate

OR

There is a pressing need to make a disclosure now, to manage risk in a timely manner and comply with the national guidance. Further research and disclosure might be necessary dependent on the outcome of the first disclosure.

The threshold should be continually considered as research progresses. If it is believed that threshold has been met, the matter must be raised for a disclosure decision at that point.

6.5 Types of Disclosure

Sussex Police will recognise three types of disclosure and fourth principle for managing safety.

- 6.5.1 **Confirmation disclosure** – The recipient already has enough information about the subject to have an informed view of their character and understands the potential risk they pose. There may be a requirement to clarify or make minor corrections to the information known or disclose some specific risk information (for example the subject stalked previous victims after offending). This can be considered during the triage and first face to face stage.

- 6.5.2 **Initial threshold disclosure** – There is a requirement for an initial disclosure, there may be requirement for further research or disclosure. An example of when this would be best used is if there is a delay obtaining PND reports but within Niche and PNC it is clear there is sufficient information to provide information to enable a person to make effective safeguarding decisions about their relationship.
- 6.5.3 **Full (threshold) disclosure** – Either all available information has been reviewed, or it is believed that the aim has been fully achieved, and no further research is considered necessary or proportionate.
- 6.5.4 **Safety check (for Right to Know or Right to Ask made on behalf on another)** – A risk has been identified that requires contact with the recipient or other confirmation to establish recipient safety, before it is possible to determine if a disclosure is necessary.

The fact that national guidance allows 28 days for a DVDS / CSODS to be completed must not shift focus from managing risk sooner, if necessary, a safety check must be considered.

Safety checks will be used where it is not possible to make an initial threshold decision to disclose the risk known. For example, information exists that a subject may have committed a murder or other serious offence abroad, but it is proving difficult to confirm the information quickly.

Information or updates from reliable sources, such as probation, outreach or social services will be suitable to satisfy the requirements of a safety check, if they mitigate the risk sufficiently.

Safety checks will have careful consideration, rationale and justification to ensure that they do not prejudice the view of the recipient towards the subject or imply that a disclosure will be given prior to a disclosure decision being made.

When a DVDS / CSODS is put forward for a disclosure decision, the type will be recorded, along with any rationale for its use.

6.6 Decision to Disclose

The decision as to whether a disclosure is necessary or not will be made by someone of the rank of inspector (or above), or a DART Sergeant. The DART Sergeant is a subject matter expert and therefore is suitably experienced to make the same decisions about applications as an inspector (or above).

They will review both the research document and then the proposed form of words in the disclosure document.

They will direct any required amendments, additions or redactions in the disclosure document.

They will apply the three-stage test, provided in the national guidance. (Necessity, Risk, Lawfulness / proportionality.) In addition, they will give direction on whether the proposed type of disclosure is suitable, who should be disclosed to and how the disclosure should it be made (in person or digitally – see Method of Delivery).

All decisions, rationale and any direction will be recorded on the Niche OEL.

Disclosures for CSODS are required to be authorised by the Duty Iris DI, not the DART Sergeant.

7. Multi Agency panel meeting

7.1 Every application for a DVDS is progressed as an application, and if it meets criteria for progression is added to the agenda for the weekly multi-agency panel meeting. This is to ensure our partners are sighted on applications and can contribute to the research stage, or to the disclosure and consideration is afforded to a joint disclosure if considered appropriate and a support service is already working with the PAR. This is separate from MARAC and chaired by the DART Sergeant. Those applications held by DACWs are not taken to the weekly multi-agency panel meeting as information held by partners is already shared within MARAC.

High risk cases are heard at MARAC, and these applications are held by DACWs.

If an application identifies that a subject or PAR has an active prohibitive order, this is disclosed at the meeting to ensure additional safeguarding can be provided to the PAR. In addition, some support services work with PARs and may be in receipt of intelligence about contact or communication between a subject and a PAR without knowing there is a prohibitive order in place; therefore, the sharing of this information is proportionate, necessary and lawful.

Information shared at the panel is done under [Data Protection Act 2018 Part 3](#) for safeguarding purposes and in accordance with [Human Rights Act 1998 Article 8](#) necessity and proportionality principles. Records retained by partners do so under [UK General Data Protection Regulation \(UK GDPR\)](#). Partners must only share information that is relevant, necessary and proportionate for safeguarding. There is an Information Sharing Agreement (ISA) in place for these meetings with all partners that attend.

Every DVDS application that is progressed, includes a request to our support services as to whether they hold any relevant information regarding the PAR or subject and this forms part of the research stage of the application.

The outcome of the meeting must be recorded on Niche using the correct template, 'Domestic Violence Disclosure Scheme – Meeting Outcome'.

CSODS applications may also be discussed where child safeguarding is relevant.

8. Delivery Stage of Process

8.1 Method of Delivery

National guidance states that delivery of DVDS and CSODS disclosures will be in person. Sussex Police utilise digital technology (Goodsam) to deliver disclosures but any person receiving a disclosure should be offered the opportunity to have this completed in person.

To minimise risk and embarrassment to the recipient, in person delivery will be made by Police Officers or staff in plain clothes and unmarked vehicles, unless there is a compelling

reason to use uniformed resources. A risk assessment will need to be completed prior to any visit to a residential premises, should the recipient not wish to attend a police station.

Digital delivery can be used for delivery of both DVDS and CSODS, but only if it provides a safer, more expedient, or better service for the recipient, not because it is easier or more convenient for police, and with the following exceptions:

- It will not be used where disclosure is likely to be a significant impact on the recipient (non-exhaustive examples would include – risk of harm or self-harm, disclosure of significant risk offences, or undeclared sex offender, pregnant by subject etc.)
- It will not be used where the recipient is under 18 years of age.

Digital delivery will be made using Force approved devices and software.

If digital delivery is used, all identification and data protection prerequisites must still be met.

8.2 Delivery alongside ongoing investigation

When a disclosure is required alongside a relevant investigation, the safety of the recipient will always be the primary consideration.

Where recipient safety can be managed to an acceptable level, an appropriate point will be chosen to make the delivery. There must be consideration given to negating future allegations that the disclosure impacted evidence provided by the recipient. For example a disclosure can be provided following a statement or video recorded interview being provided by the recipient, should it be safe to delay the disclosure.

If a delay in delivery is deemed necessary due to the ongoing investigation, the rationale must be clearly recorded on the Niche Occurrence and ratified by the DART Sergeant.

8.3 Prerequisites prior to delivery

The delivering Police Officer or Staff must check and record the form of identification (ID) provided by the recipient or explain how identity was confirmed. There is no requirement to take copies of the ID, but the ID reference should be recorded on the OEL, using the DVDS template 'Face-to-Face with Person at Risk' under the heading 'Verification of Identity' or for CSODS the Safeguarding template 'Stage 2 – Identity check'.

If identity cannot be confirmed, there will be no disclosure. The information that was to be disclosed should be considered as intelligence and used for other safeguarding purposes if necessary.

The delivering Police Officer or Staff must read the data protection warning (included in the disclosure document) to recipient and ask them to sign if the recipient is seen in person.

If using digital delivery methods, or the recipient declines to sign the warning, they must be asked to verbally confirm their agreement. The delivering Police Officer or Staff must record

this using a suitable method (Goodsam, Pocket Notebook (PNB), Investigators Notebook (INB) or Body Worn Video (BWV) etc).

If the recipient refuses to either sign or verbally agree to the warning, the delivering Police Officer or Staff must decide as to whether the delivery should progress. If there is likely to be an obvious and preventable data protection breach, a disclosure must not be made.

8.4 Making the delivery

The delivering Police Officer or Staff will be responsible for ensuring that the delivery is made in a private space, and that neither the subject nor anyone else without a right to hear the disclosure is present. For digital delivery this may require the recipient to show the delivering Officer / Staff member there is nobody else present.

Disclosures will only be provided verbally. The delivering Police Officer or Staff member must ensure that they are not being recorded and they must not hand any documents to the recipient or allow copies to be made.

All signed disclosure forms will be scanned and attached to the Niche Occurrence; the original must then be disposed of securely.

Under the Domestic Violence Disclosure Scheme (DVDS / Clare's Law) national guidance, the disclosure does not have to be delivered solely by a Police Officer or member of Police Staff.

The guiding principle is that the disclosure should be made by the most appropriate person, taking account of risk, safeguarding needs, and the relationship with the person receiving the information (the Person at Risk (PAR)). In practice, disclosures are often delivered jointly by Police and a specialist support agency, and there is provision for disclosures to be delivered by appropriately trained partner agency practitioners, such as an Independent Domestic Violence Advocate (IDVA), where this is considered the safest and most effective approach. This does however require DI / Detective Chief Inspector (DCI) authority and strong rationale must be recorded as to why Police are not going to be present. (This would be most suitable in cases where a PAR does not have trust and confidence in Police, but Police hold critical information that the PAR would benefit from receiving to make effective safeguarding decisions).

8.5 Refusals

Any refusal to receive a disclosure must be reviewed by either an Inspector or a DART Sergeant. They will review the reason for the disclosure and provide direction as to whether the refusal should be accepted, whether further attempts should be made, if a different approach should be used, and if there are any other safeguarding actions required.

8.6 Flags and markers

Niche / PNC flags and markers will be used to highlight that a disclosure exists for the recipient, unless there is a compelling reason not to. For example, there has been good contact with the recipient, and a delivery appointment is already booked.

Disclosures must be authorised for delivery before flags and markers are applied, unless there is a specific reason or identified risk, that requires the recipient to be located. For example, Police are willing to tell the recipient that a disclosure is being considered

following a request being made on their behalf, but we currently have no method of contacting them.

The wording of any marker used must ensure that it does not place the recipient at risk, for example if they should come to police attention whilst in company with the subject.

The marker types used will be 'locate trace' for PNC and 'Be On Look-Out (BOLO)' for Niche.

8.7 Non-contact cases

If a PAR or recipient cannot be contacted after a disclosure decision is prepared and authorised, or where there is nothing to disclose, there is a necessity to set out a clear, risk led, victim centred process in line with national statutory guidance and policing principles.

This applies to all DVDS and CSODS applications, irrespective of which team has ownership of the application.

Redacted text

Note: "Something to disclose" refers to an approved decision that a disclosure is necessary and proportionate to prevent domestic abuse. "Nothing to disclose" refers to a decision that no relevant disclosure is necessary under DVDS or CSODS. Both outcomes must follow national decision-making standards and be recorded.

The OIC must have consideration for contact methods and whether it is safe to leave any kind of message, voicemail, text message or calling card when trying to contact a person at risk. An agreed method of contact should be set on the initial face to face meeting with the person at risk, and in the event this is unsuccessful then OICs must ensure they are not leaving messages that make direct reference to the application so to not put the person at risk at greater risk.

Where deemed appropriate, all available resources should be considered to effect delivery of a disclosure. Consideration should be given to requesting assistance from colleagues from **Bluestone / Iris, Force Intelligence Bureau (FIB), Divisional Response Team (DRT) and Neighbourhood Policing Team (NPT)** to gather information and intelligence that may enable safe contact with the PAR.

8.8 Recording Standards (all cases)

Before closure due to non-contact, the OIC or supervisor must ensure the record includes:

- Risk level and date / time of the risk assessment:
- Disclosure decision (something / nothing to disclose) and authorising supervisor:
- Contact strategy and dynamic risk assessment for each attempted method:
- Chronology of attempts (dates / times, method, outcome, any safeguarding concerns):
- Consultation / oversight: Where high risk, DI review notes and rationale; confirmation that further Occurrences since application date were checked and considered in the closure decision:

- Safety planning efforts (e.g., referrals, MARAC consideration, protective measures explored), where appropriate.

Decisions made by the OIC regarding closure must be ratified by their supervisor and have it recorded on the OEL.

8.9 Mandatory “Notify if” Marker (no contact achieved)

In **all cases** where the PAR cannot be contacted within the relevant window, the OIC must add a “**Notify if**” marker on the PAR and subject records for **at least 28 days** so that any new contact / Occurrence alerts OICs for reassessment and potential re-engagement. The marker must state:

- DVDS or CSODS application reference:
- Date of last contact attempt:
- Risk level at last assessment:
- Summary of disclosure position (without sensitive details).

In the event that a PAR who has refused a disclosure makes contact with Police to state they now wish to receive the disclosure, the disclosure that was prepared can still be given provided:

- The PAR and the subject are still in a relationship of some kind, or still have contact due to shared children or property; and
- No more than 3 months have passed since the closure of the original application.

If neither condition is present then it should be treated as a new application, and the process started again from the beginning.

Officers and Staff providing the disclosure must perform a minimum of a PNC and Niche check to ensure there are no significant changes to the risk presented to the PAR, and confirmation of this check can be added to the OEL using a minute sheet entry as opposed to using a DVDS template.

8.10 Safeguarding and Escalation

- **Emerging risk:** If intelligence indicates escalation at any point (e.g., new offences, threats, stalking indicators), upgrade the risk level, and seek **supervisory direction** immediately:
- **MARAC:** Consider referral where thresholds are met or professional judgement indicates:
- **Children and vulnerable adults:** Mandatory submission of a Child at Risk form whenever a DVDS or CSODS disclosure is made, along with an Op Encompass referral where there are children of school age.
- Please consider submission of a Vulnerable Adult at Risk (VAAR) were relevant.

8.11 Governance, Quality Assurance and Audit

- **Supervisory checks:** DART Sergeant must review all closures; **DI sign-off is mandatory** in high risk cases closed without contact.
- **Audit:** Monthly dip-sampling by DI or DCI of DART to ensure compliance with statutory guidance and the College of Policing principles (governance, performance, evidence of full risk assessment). Findings to be reported to the DA Improvement Board with remedial actions tracked.

8.12 Application Finalisation

Once a DVDS application has been completed and either a disclosure given, or the decision is made that a disclosure cannot or should not be given then the OIC is to complete a DVDS or CSODS finalisation using the correct template recording the correct outcome of the application.

The OIC must complete a safeguarding plan with the PAR where a disclosure is given, and this must be recorded on a safeguarding template on the Niche report.

The OIC must consider what safeguarding advice would be applicable for a PAR who does not wish to continue with the application and record this in a safeguarding template on the Niche record.

If a disclosure has been made and a child lives within or visits the location so regularly to be considered resident, then submission of a Child at Risk form is mandatory along with an Op Encompass referral. Consideration should also be given to the submission of VAAR. Where appropriate 3x5x2 must be submitted.

When the OIC is satisfied that the application is complete and the correct templates have been used throughout the process at each stage, an Inspector or DART Sergeant must be tasked to review the application and finalise it.

For applications within the DART, the DI or Sergeant of the DART will review and finalise.

For all applications that sit with DACWs, the DA DIs within Public Protection will review and finalise.

For all applications that sit outside of DART or DACWs, the DART DI or Sergeant will review and finalise. OICs should task the DART inbox within Niche.

If on review, there are significant issues with policy or safeguarding compliance then the OIC will be tasked to rectify and then resubmit to the appropriate DI or Sergeant.

8.13 Occurrence recording errors

When the application is reviewed by the relevant Inspector, the 'Stats Classification' section of the Niche report should be empty. If something is created but it is blank, Case Management Unit (CMU) supervisors Niche inbox must be tasked to delete it. If any information has been inputted a cancellation task will need to be sent to the Force Crime Audit Team. Only then can the Niche record be finalised.

9. Safeguarding and Referrals

9.1 Safety plans

Following delivery of a disclosure, the delivering Police Officer or Staff member will have a discussion with the recipient, to establish their response to the disclosure, their intentions and any other support required.

The delivering Police Officer or Staff member will complete a safety plan based on this discussion, details of which should be recorded on the OEL using the 'Safeguarding plan' template, unless there is clear rationale why one is not required, and this should be recorded on the OEL.

Any action related to the safety plan must be raised and progressed as appropriate.

Safety plans will be considered throughout the process, as there may be occasions where they are required prior to a disclosure or following a decision not to disclose or a refusal.

9.2 Support services

The delivering Police Officer or Staff member must be prepared to signpost the recipient towards support services, as outlined in the national guidance.

Support services for the perpetrator must also be considered.

9.3 Signs

A Signs adult / child at risk (as appropriate) must be completed for every disclosure that is given or refused, unless one has already been submitted as part of a linked Occurrence. This includes where a 'Nothing to Disclose (NTD)' is given - Safeguarding may still be triggered by the **situation**, not the **subject's history**.

Safeguarding must consider all persons potentially affected, including children connected to the PAR and the Subject.

Signs must be completed as soon possible after the disclosure / refusal and in any case prior to the end of duty.

The Signs will include details of all relevant adults and children.

The Signs must not include a full copy of the disclosure given to the recipient, but it must include an indication of what was disclosed. For example, 'DA in the current relationship and sexual assaults'.

The Signs must include sufficient information to ensure social services understand the risk and issues, to aid their decision making. A non-exhaustive list of information to include would be how the recipient responded to the disclosure, what their intentions are, whether they intend to cease the relationship / contact.

9.4 3x5x2 Intelligence report

A 3x5x2 intelligence report must be completed for every disclosure that is given or refused, to allow the notification to be automatically uploaded onto PND.

The intelligence report must be completed as soon possible after the disclosure / refusal and in any case prior to the end of duty.

The detail in the intelligence report will only state that a disclosure was given or refused and referencing the relevant Niche Occurrence number. It must not include any information about the recipient / PAR.

9.5 Offender management

Subjects identified through DVDS / CSODS enquiries will be considered for suitable offender management schemes when appropriate. The Complex Domestic Abuse and Stalking Unit (CDASU) can provide information to OICs who think the subject is suitable to refer to High-Harm Domestic Abuse Perpetrator Programmes.

9.6 Cross border requests

The co-ordinating force (the area where the applicant lives) is responsible for:

- Recording the application:
- Conducting the risk assessment:
- Co-ordinating the enquiries:
- In most circumstances, determining whether a disclosure is made:
- Safeguarding responsibility remains with the co-ordinating force unless immediate action is required in the responding force area.

The responding force (the area where any party other than the applicant lives) is responsible for:

- Any actions in relation to any party other than where the applicant lives:
- Reporting back to the co-ordinating force with their findings and within agreed timescales, ensuring compliance with the 28 day statutory requirement.

Where Sussex Police receive an application but the PAR lives in another force area the application will be recorded on a CAD and transferred via FCCCD through their usual process.

10. Templates

10.1 At each stage of the process of CSODS and DVDS applications, the decision making and progress must be recorded on the Niche OEL, using the correct Niche templates.

For DVDS applications there are multiple templates under the menu 'Type' titled 'Domestic Violence Disclosure Scheme,' and the correct template must be used and filled out correctly at every entry.

It is essential that the disclosure template is used when a disclosure is attempted, and the correct date added. It is also essential that the finalisation is used and filled out correctly, identifying the outcome for the application. The data captured in these forms is provided to His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) therefore must be accurate.

For CSODS applications there are multiple templates under the menu 'type' titled 'Safeguarding', each title begins with the terminology 'CSODS'.

If the templates are not used or completed incorrectly it has a direct impact on the data that is used for Power BI, Freedom of Information requests and for HMICFRS.

Supervisors reviewing and finalising DVDS and CSODS applications must ensure the correct templates are used and filled out properly and accurately.

11. Demand and Escalation process

11.1 The amount of open applications will fluctuate during any given month, but the volume of applications will have a direct impact on the ability to reach the statutory 28 day timeframe.

Any applications that are over 28 days must be brought to the attention of the OIC's DI for review to establish reasons for delay, identify where support may be needed and to review whether other incidents have been reported since the application went over 28 days.

In the event that any applications are more than 42 days since the date of application, a full review must be completed by the DI or above for immediate resolution, which may include utilising other departments for assistance especially if the delay is due to not being able to contact the PAR / recipient.

If the volume of applications, or applications over 28 days rises above the locally agreed amount then the DART Sergeant must escalate this to the Public Protection Command for oversight and support.

12. Equality, Diversity and Accessibility

12.1 In all applications of DVDS and CSODS, Police Officers and members of Police Staff must consider the [Equality Act 2010](#) and barriers to contact (language, disability, technology access). We must seek to provide reasonable adjustments where possible (e.g. interpreters, alternative formats) and use trauma-informed approaches. It is crucial that we record adjustments offered and whether they were accepted or declined. This is consistent with the victim-centred ethos in national guidance.

13. Additional documents

13.1

[Domestic Violence Disclosure Scheme \(DVDS\) Statutory Guidance](#)

[The Child Sex Offender Disclosure Scheme \(CSODS\)](#)