

Gloucestershire Constabulary
Police Headquarters
No.1 Waterwells, Waterwells Drive
Quedgeley, Gloucester. GL2 2AN
www.gloucestershire.police.uk



Your reference:

Our reference: FOI_25_1204

E-mail: FOI

@gloucestershire.police.uk

Direct dial: 01452 754304

Postal Address: As above

Date: 10/04/2026

Dear

Gloucestershire Constabulary Freedom of Information request FOI_25_1204

On 18/12/2025 you sent an email constituting a request under the Freedom of Information Act asking the following:

Delays due to resourcing are one thing, the inability to provide an estimated time for disclosure another – you are conversant with staff & request numbers, will be aware which requests are currently the subject of disclosure etc. It is particularly concerning a police authority is not complying with the law.

In the absence of reasonable assistance in relation to the anticipated disclosure date, I have included the ICO to progress a formal complaint.

1. Regarding your explanation, please provide the following information since 01/01/2024 on a month on month basis:

- a. The number of disclosure staff employed
- b. Whether these staff attend to all aspects of disclosure, for example, SAR, FoIA, court orders, RTC report requests etc
- c. The number of disclosure staff handling SAR requests

Please also provide:

2. Reports to management/others about the delay issue and the means by which to address the situation

3. Advertisements for staff

4. In excel/csv format, on a row-by-row basis for each SAR request:

- a. The SAR requests received date
- b. The SAR 1st disclosure date

And

5. Any exchanges with the ICO about the backlogs

Under the Freedom of Information Act 2000 s1, I can confirm that Gloucestershire Constabulary holds some relevant information.

Q1 – Please see the attached data table – “FOI_25_1204_Q1_Resources”

Please note, the term “omnicompetent” refers to those Disclosure Officers who deal with all workstreams across the Information Disclosure Unit. These are detailed within the vacancy advert attached for Q3.

Q3 - Please see the attached document – “FOI_25_1204_Q3_Vacancy adverts”

Q4a – Please see the attached data table – “FOI_25_1204_Q4_SARs Received”

Please note that daily totals have not been provided.

Section 17 of the Freedom of Information Act 2000 requires Gloucestershire Constabulary, when refusing to provide information (because the information is exempt) to provide you the applicant with a notice which: (a) states the fact, (b) specifies the exemption in question and (c) states (if not otherwise apparent) why the exemption applies.

With regard to the above requested information, the following exemption applies:

Section 40(2) – Personal Information

Section 40(2) applies to third party personal data. This would not be released under the Freedom of Information Act unless there is a strong public interest. This is because any release would breach the Data Protection Principles contained within the Data Protection Act 2018, namely the first principle which requires that personal information be processed lawfully, fairly and with transparency. The Constabulary will not release any information under the Freedom of Information Act which may result in the identification of an individual. Due to the low number of requests received when broken down daily, it is highly likely that an individual may be identified and this includes the potential for an applicant to identify themselves in the information disclosed.

This exemption is absolute and class based therefore I am not required to apply either the public interest test or harm test in disclosure.

Q4b – The response time for SARs is 1 calendar month from the date of receipt.

Q2 & 5 – This information is exempt under S.31 – Law Enforcement.

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With regard to the above requested information, the following exemptions apply:

S.31(1)(g) by virtue of subsection (2)(c)

The exemption above is qualified and prejudice based therefore both a Public Interest Test and Harm Test are required.

Evidence of Harm

To disclose correspondence between Gloucestershire Constabulary and the ICO would, or would be likely to harm the ability of the regulator to determine whether they should take any regulatory action.

Public Interest Test**Factors favouring disclosure – s31**

There is a legitimate public interest in the public being satisfied that organisational management and/or regulatory bodies are aware of issues within the department and are working towards solutions to address them.

Factors favouring non-disclosure – s31

The disclosure of information would inhibit the organisations ability to make progress by not being able to engage openly with the ICO, giving full disclosure of all relevant information without fear that information will be made public prematurely.

Balance Test

Having considered these factors, we are satisfied that on balance the public interest in maintaining the exemption outweighs the public interest in disclosure at the present time.

This acts as a refusal notice for this part of your request.

If you are not satisfied with this response or any actions taken in dealing with your request, you have the right to ask that we review your case under our internal procedure. Please note that a request for an internal review must be made within 20 working days of the response to your original request.

If you decide to request that such a review is undertaken and following this process you are still unsatisfied, you then have the right to direct your complaint to the Information Commissioner for consideration.

The Information Commissioner can be contacted via the following means:

Website - <https://ico.org.uk/>

Call their helpline - 0303 123 1113

Email - casework@ico.org.uk

Post – Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Yours sincerely,

Disclosure Officer
Gloucestershire Constabulary

Month/Year	FTE of Disclosure Officers	Comments	Vacant Posts (FTE)
Jan-24	4	3x Omnicompetent 1x SAR only (Loss of temporary resource)	0
Feb-24	4.81	4x Omnicompetent 0.81 FTE contracted additional resource for other tasks	0
Mar-24	4.81		0
Apr-24	4.81		0
May-24	4.81		0
Jun-24	4.81		0
Jul-24	4.81		0
Aug-24	4.81		0
Sep-24	4.81		0
Oct-24	4.81		0
Nov-24	4.81		0
Dec-24	4.81		0
Jan-25	4.81		0
Feb-25	4	4x Omnicompetent (Loss of 0.81 FTE contracted resource)	0
Mar-25	4		0
Apr-25	4		0
May-25	4		0
Jun-25	4		0
Jul-25	4		0
Aug-25	4	1x SAR 1x other tasks 2x long term sick	0
Sep-25	4		0
Oct-25	4		0
Nov-25	4		0
Dec-25	4	2x SAR 1x other tasks 1x long term sick	0*

* Fixed term contract for 1x Disclosure Officer agreed in addition to existing FTE.


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6193 Information Disclosure Manager

Role Type	Police Staff
Local Policing/ Business Area	Governance and Compliance
Department	Governance and Compliance
Location	HQ Waterwells
Grade	PO1
Salary	£40,005 - £41,928
Hours per Week	37
Type of Contract	Permanent
Job Advert Description	Do you have experience in information management and would like to be part of a friendly and supportive leadership team in the governance and compliance department. If so we would like to hear from you. You will work closely with department leadership colleagues, who are the data protection officer and the information security officer. You will need to have management experience as you will be managing a team within the Information Disclosure Unit and coordinating their work to ensure the force meets all of the outputs required in respect of all relevant legislation. The work streams are - information disclosure, freedom of information, data protection, subject access requests, criminal injury compensation authority requests, and fitness to practice requests, requests from regulatory bodies, ACPO MoUs and information sharing agreements. If you think you can add value and are interested in the role we would like to hear from you. Should you require any further information regarding this role, please contact Sara Armstrong on Sara.Armstrong@gloucestershire.police.uk. Please refer to the Role Profile document when completing the <i>Statement in support of your application</i> section of the form. In this section, you are required to provide evidence with specific examples for each of the Essential criteria included under the Experience and Qualifications section of the Role Profile. For each of the criteria, please write a paragraph detailing how your experience, qualifications, skills and abilities meet the minimum criteria for the role. Applicants who do not provide this required evidence will unfortunately not be invited to interview. If you require help and support with your application, you can Register your interest with Better Together - Gloucestershire Constabulary (tal.net) Candidates applying for Gloucestershire Constabulary should be aware that the use of online 'Artificial Intelligence' (AI) systems such as ChatGPT to generate application answers is NOT permitted, any candidate found to have submitted an application form using online 'AI' software to generate answers will be removed from the recruitment process with immediate effect. This may result in future applications with the Constabulary also being rejected, based on integrity. If you are applying via Indeed or DWP: Please click on the following link to be redirected to our website, where you will be required to click on the vacancy to complete our application form- https://www.gloucestershire.police.uk/police-forces/gloucestershire-constabulary/areas/gloucestershire/ca/careers/police-staff/ The closing date for this role is included within the Indeed advert and all applicants MUST apply via our website. We regret that we are unable to accept applications outside of our website's application form and after the vacancy close date. As such, we suggest that you apply as soon as conveniently possible to avoid disappointment. At Gloucestershire Constabulary we recognise the benefits of increasing diversity across our force and the value of building a representative workforce. That is why it is important that people from ethnically diverse backgrounds and under-represented groups, including those with a disability, apply and help us deliver excellence in policing throughout Gloucestershire. We are a proud Disability Confident Employer and are committed to providing equal opportunities. You may wish to register with our Talent Bank- the link can be found here: https://gloucestershireconstabulary.tal.net/vx/appcentre-External/brand-3/candidate/so/pm/8/pl/12/opp/457-Register-your-interest-with-Better-Together/en-GB
Closing Date	14/06/2024, 23:55

Document Attachment

6193 Information Disclosure Manager - Role Profile.pdf – 168KB


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6355 Information Disclosure Manager

Role Type	Police Staff
Local Policing/ Business Area	Governance and Compliance
Department	Information Disclosure
Location	HQ Waterwells
Grade	PO1
Salary	£41,907 - £43,920
Hours per Week	37
Type of Contract	Permanent

Job Advert Description

An exciting opportunity exists within Gloucestershire Constabulary Governance & Compliance Department for an Information Disclosure Unit Manager.

The role is a permanent, full time position based at Gloucestershire Constabulary Headquarters, Waterwells in Quedgeley, there will be flexibility with hours and agile working to be agreed with the Head of Department.

You will manage a small team of Disclosure Officers, ensuring compliance with all aspects of legislative requirements such as FOIs and SARs.

If you would like any further information about this role, or would an informal conversation, please get in touch with the Head of Department, Erica Field - Recruitment@Gloucestershire.Police.uk

The proposed interview date is 4th December.

Please refer to the Role Profile document when completing the Statement in support of your application section of the form. In this section, you are required to provide evidence with specific examples for each of the Essential criteria included under the Experience and Qualifications section of the Role Profile. For each of the criteria, please write a paragraph detailing how your experience, qualifications, skills and abilities meet the minimum criteria for the role. **Applicants who do not provide this required evidence will unfortunately not be invited to interview.**

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Need help with your application?

If you need any support while completing your application, whether it's understanding the questions, gathering the right information, or just having someone to talk it through with, then our Better Together Team is here to help. We'd be happy to support you at any stage of the process.

For support with your application, please contact **Better Together** at BetterTogetherTeam@Gloucestershire.police.uk

At Gloucestershire Constabulary we recognise the benefits of increasing diversity across our force and the value of building a representative workforce. That is why it is important that people from ethnically diverse backgrounds and under-represented groups, including those with a disability, apply and help us deliver excellence in policing throughout Gloucestershire. We are a proud Disability Confident Employer and are committed to providing equal opportunities. You may wish to register with our Talent Bank- the link can be found here: <https://gloucestershireconstabulary.tal.net/vx/appcentre-External/brand-3/candidate/so/pm/B/pl/12/opp/457-Register-your-interest-with-Better-Together/en-GB>

Closing Date

30/11/2025, 23:55

Document Attachment

Information manager (1).pdf – 246KB [Download](#)

Role Profile Type:	05 - Posts Graded PO 1 - 6
Role Profiles:	Governance & Compliance: Information Disclosure Unit Manager
Published:	Yes
Superintendent Role:	No
Description: The purpose of this post is to manage the Information Disclosure Unit and to ensure the force meets all of the outputs required in respect of all relevant legislation.	
Main Responsibilities: 1. Manage the Information Disclosure Team Unit and Coordinate their work. The workstreams are - information disclosure, freedom of information, data protection, subject access requests, criminal injury compensation authority requests, fitness to practice requests, requests from regulatory bodies, ACPO MoUs and information sharing agreements 2. Manage staff performance using the Personal Development Review (DPR) system, ensuring that annual and interim meetings take place and objectives are agreed and actioned. 3. Have overall responsibility for management of the Information Disclosure Unit (IDU), including the management of staff, coordination of work, development of staff, including providing support for appropriate education and training. 4. Develop the IDU, by implementing a development plan and relevant action plans to ensure that the IDU is run in an effective and efficient way. 5. Develop training plans for each work stream within IDU ensuring these plans are kept up to date with relevant legislation. 6. Show a commitment to continuous personal and professional development and demonstrate the ability to work under pressure, on own initiative, with minimum supervision. 7. Must keep up to date on ICO regulations and guidelines, this includes liaising with them on information disclosure matters. 8. Maintain personal integrity and confidentiality in all aspects of work, in order to ensure compliance with the Data Protection legislation and Force policies 9. Implement management strategies in a pragmatic and logical way to problem solve to ensure the team is run effectively.	

10. Support the organisation specifically the Information Disclosure Unit in adhering to all aspects of Data Protection and Freedom of Information compliance

11. Assist in the review and maintenance of the Constabulary's Information Sharing Policy

12. Facilitate a review process to ensure that partner organisations are removed from or added to agreements when required and to regularly examine the working of the agreement

13. Facilitate the implementation of agreements by providing advice on the appropriate format, lawful basis and other content as required and reviewing the draft agreements to ensure compliance with the data protection principles

14. Create and maintain an Information Sharing Section on the Intranet and Internet (where appropriate) which will contain links to relevant guidance, template documents, links to procedure and policy documents

15. Create, maintain and publish relevant Information Sharing guidance, including but not limited to a Force How to Guide and SPoC guidance.

16. Maintain and publish an up to date Constabulary SPoC list.

17. Maintain and publish internally and externally (where appropriate) a log of all information sharing agreements and relevant signatories/points of contact to agreements

18. Develop and conduct a routine robust audit schedule/process for auditing information sharing agreements in full to monitor compliance with the Data Protection Act 2018 and MoPI

19. Provide advice and assistance to SPoCs and other Constabulary employees dealing with information sharing queries?

Rank\Scale:

PO1

Reports To:

Head of Governance and Compliance

Additional Information:

Vetting Level: The role must be vetted to a minimum of Recruitment Vetting (RV).

Mobility: The Force reserves the right to request you to carry out any other duties or move you to any other post appropriate to your grade, at any location within the county of Gloucestershire, as business requirements dictate.

Working Pattern: Normal working hours will average 37 per week or will be pro rata. This will be worked subject to the needs of the service and may involve shift, night, weekend and public holiday working.

Standards of Professional Behaviour: All members of Police Staff/Police Officers must comply with these standards.

Travel/Driving Licence: The post holder must hold a valid UK driving license and will be required to travel around the county preferably using own transport. There may also be occasional travel to meetings outside the County.

Training and development: The postholder must hold data protection qualification and undertake the required training and development to maintain working knowledge.

Experience and Qualifications:

1. A working knowledge of and ability to apply and interpret information disclosure related legislation, primarily MoPI, Data Protection, Freedom of Information, Computer misuse, Human Rights and other relevant legislation
2. Substantial experience of working with key stakeholders such as local authorities, Courts and legal practitioners
3. Ability to compose strategies, policies and procedures to ensure compliance of all relevant responsibility areas.
4. A relevant Data Protection qualification and or Freedom of Information qualification
5. Working knowledge of MS Office products
6. Minimum of 4 GCSE's (A* to C Grade) and Level 3 Qualification (A levels, Diploma or equivalent)
7. Experience of managing a large team, and the ability to coach, motivate, train and develop the staff within IDU, wider organization and external stakeholders.


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6369 Disclosure Officer

Role Type: Police Staff

Local Policing/ Business Area: Governance and Compliance

Department: Governance and Compliance

Location: HQ Waterwells

Grade: SC6

Salary: £33,603 - £35,772

Hours per Week: 37

Type of Contract: Fixed Term

Job Advert Description The Information Disclosure Unit (IDU) is looking to recruit 2 x temporary Information Disclosure Officers for an 18 month fixed term contract, on 37 hours a week (full time)

The proposed interview date is W/C 5th January 2026.

Due to the bespoke nature of this role, the pay scale is split into two;

Without a FOI or DP qualification; - Scale 6 – £33,603 to £35,772

With a FOI or DP qualification; SO1 (Senior Officer 1) - £37,020 to £39,276

Due to the nature of a temporary contract, we cannot guarantee that we will be able to furnish temporary disclosure officers with the opportunity to gain a qualification which will provide the uplift from Scale 6, to SO1. Please also note that pay scales naturally increase (1) post probation, roughly 6 months and then subsequently (2) after 12-18 months of service dependant on joining date.

The main function of the unit is to process two main statutory disclosures;- Freedom of Information Requests (FOI's, as per Freedom of Information Act 2000) and Data subject access requests (DSAR's, as per the Data Protection Act 2018 & UK General Data Protection Regulation). The role does have other supplementary responsibilities;- please see the attached Role Profile.

If you have any queries regarding this role, please email Recruitment@Gloucestershire.Police.uk

Notice for internal candidates: this role is advertised as a fixed-term contract. In the event that you successfully interview for this role, you will accept the role on either a secondment or fixed-term contract basis.

You will only be offered a secondment subject to your current Line Manager's approval - please note that there is no guarantee that management will agree to the secondment and there is no obligation for them to do so. It is advisable to liaise with management to see if a secondment would be supported before submitting an application.

In the event that you are offered the role as a fixed-term contract, you should be aware that you have no right to return to your previous role and will leave the force when your contract ends. In the event that you have accrued two years' continuous service when your contract ends, you may be eligible to be added to the redeployment register, however it is not guaranteed that we will be able to offer you a suitable alternative. When accepting the role on a fixed-term basis, you take the personal risk that your employment with the force may end at the end of the contract. More information regarding the redeployment register can be found [here](#).

Please refer to the Role Profile document when completing the Statement in support of your application section of the form. In this section, you are required to provide evidence with specific examples for each of the Essential criteria included under the Experience and Qualifications section of the Role Profile. For each of the criteria, please write a paragraph detailing how your experience, qualifications, skills and abilities meet the minimum criteria for the role. **Applicants who do not provide this required evidence will unfortunately not be invited to interview.**

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Closing Date

22/12/2025, 23:55

Document Attachment

Disclosure Officer - role profile.pdf ~ 245KB 

Role Profile Type:	04 - Posts Graded SO1 or SO2
Role Profiles:	Gov and Comp: Disclosure Officer
Published:	Yes
Superintendent Role:	No
Description: This Role Profile describes the main areas of responsibility associated with this post along with the knowledge, skills and experience required of the post holder. In addition it describes the key activities and behaviours that the Constabulary expects all employees at this grade to be able to perform and demonstrate. In performing this particular role you may not be required to carry out or demonstrate all of the activities and behaviours described below, however you must be capable of doing so as the post-holder will be required from time to time to contribute to Organisational Objectives which may not be directly related to this role profile. The Constabulary operates a rigorous vetting policy and applicants and employees must be aware that personal vetting will be applied as part of their recruitment and ongoing employment with the Constabulary.	
Main Responsibilities: 1. Process information disclosure requests, be they under DP, FOI or any other legislative or agreement based information exchange 2. Support the organisation in adhering to all aspects of DP and FOI Acts e.g. FOI publication scheme, Data Protection compliance etc 3. Provide support and guidance to IDU Disclosure Officers where required undertaking to audit and quality assure responses made by the Disclosure Officers 4. Provide advice to members of the public and staff at all levels as and when required on matters of disclosure related legislation, FOIA and Environmental Information Regulations (EIR) as well as ACPO, Home office and local Force policies and guidance 5. Contribute to disclosure awareness throughout the Force by assisting in the delivering of training and presentations as directed by the Head of IDU. 6. Undertake research and projects as directed by the Head of IDU. 7. Take responsibility for own personal development maintaining an up to date awareness of changes to legislation, codes of practice, policies and procedures 8. Deputise for the Head of Unit when required, including representation at regional bodies as required. 9. Contribute to the development of the working environment and working practices so as to build best practice 10. Effective and efficient use of relevant Information Technology in support of Information Disclosure Unit functions. 11. Adhere to Health and Safety, Environmental Management, Data Protection, Equal Opportunities, Freedom of Information, Race Relations and European Convention on Human Rights (ECHR) legislation, and ensuring compliance with appropriate local procedures. Communications & Working Relationships. This will include, but is not limited to: - CIMB Managers at all levels - ACPO CRU - Home Office - Office of the Information Commissioner - Constabulary Police Officers and Staff at all levels - Members of the public - Councils, solicitors and other government departments and public sector agencies and Forces - National Police Improvement Agency - ACPO Criminal Records Officer - CAFCASS	

Rank\Scale:	Scale 6 - SO1 dependant on relevant qualification
Reports To:	Disclosure Team Leader
Additional Information: Vetting Level: The role must be vetted to a minimum of Recruitment Vetting (RV). Mobility: The Force reserves the right to request you to carry out any other duties or move you to any other post appropriate to your grade, at any location within the county of Gloucestershire, as business requirements dictate. Working Pattern: Normal working hours will average 37 per week or will be pro rata. This will be worked subject to the needs of the service and may involve shift, night, weekend and public holiday working. Standards of Professional Behaviour: All members of Police Staff / Police Officers must comply with these standards. Training and development: Undertake the required training and development to maintain working knowledge.	
Experience and Qualifications: Essential Experience 1. A working knowledge of and ability to apply information disclosure related legislation, primarily Data Protection Act 1998, Freedom of Information Act, Computer Misuse Act 1990, Human Rights Act 1998 and other relevant legislation 2. Working knowledge of MS Office products 3. Keen eye for accuracy and detail 4. Experience of working in a confidential environment demonstrating a high level of personal integrity and discretion when dealing with confidential matters. 5. Experience of interpreting and applying legislation so as to make balanced decisions concerning information disclosure 6. Must demonstrate history of personal and professional development 7. Ability to prioritise work according to deadlines and be able to work under pressure, with a minimum of supervision. Desirable Experience 1. Experience of developing and maintaining effective working relationships with other departments and external agencies 2. Experience of interacting with members of the press 3. Experience of undertaking research and providing clear, concise and accurate guidance to users at all levels. 4. A working knowledge of the processes for CAFCASS, Notifiable Occupations Scheme (NOS), Subject Access Requests (SAR), disclosures to courts in cases relating to children, FOI publication schemes, records management code of practice 5. A knowledge of ACPO Home Office guidance and Force policies, procedures and codes of practice 6. Experience of delivering presentations within organisations, with the aim of engaging all relevant stakeholders through the use of various mediums including Microsoft Office products.	

Essential Qualifications

1. Practitioner Certificate in Data Protection or equivalent qualification or relevant experience and a willingness to undertake the qualification.
2. Have attended or willingness to attend the ACPO CRU FOI Decision Makers Course
3. Minimum of 4 GCSE's (A* to C grades) or equivalent, to include English and Maths

Notes:

Job holders start on Scale 6, unless already appropriately qualified.

Month/Year	Total
2023	
Dec	1
2024	
Jan	27
Feb	32
Mar	35
Apr	27
May	30
Jun	27
Jul	35
Aug	33
Sep	36
Oct	37
Nov	34
Dec	28
2025	
Jan	36
Feb	35
Mar	46
Apr	27
May	48
Jun	52
Jul	49
Aug	39
Sep	35
Oct	45
Nov	47
Dec	38
Total	879