

Date: 6th October 2020

Our Reference: FOIA-2020-107

RE: Your request for information under the Freedom of Information Act 2000

I write in response to your Freedom of Information Act 2000 (or 'FoIA 2000') request dated **10/09/2020** in which you requested:

"About Bramshill Police Staff College, as far as I know, the college was closed.

1. Then Which training center has a responsibility for direct entry superintendent, direct entry inspector, and fast track program?

I'd like to know about **direct entry superintendent, direct entry inspector, fast track inspector**. According to this site(<https://www.college.police.uk/News/College-news/Pages/Direct-Entry-five-year-evaluation-report-published-July-2020.aspx>) in the case of direct entry superintendent, 25 out of 33 completed, 4 left and 4 were still being trained for the program.

2. What was the reason for them to leave the program and why were they still being trained? Did they fail to meet the criteria? Or were they fired?
3. Could you break down the reason, the criteria and the contents ?
4. Where does the training take place? Each police force train them respectively at their own training center or College of Policing train them or any other training center?

According to this site(<https://www.college.police.uk/News/College-news/Pages/Direct-Entry-five-year-evaluation-report-published-July-2020.aspx>)

in the case of direct entry inspector, 11 out of 54 completed, 9 left and 34 were still being trained.

5. What was the reason for them to leave the program and why were they still being trained? Did they fail to meet the criteria? Or were they fired?
6. Could you break down the reason, the criteria and the contents ?
7. Where does the training take place? Each police force train them respectively at their own training center or College of Policing train them? or any other training center?

According to this site(<https://www.college.police.uk/News/College-news/Pages/Direct-Entry-five-year-evaluation-report-published-July-2020.aspx>)

in the case of fast track inspector, 98 out of 252 completed, 14 left and 140 were still being trained.

8. What was the reason for them to leave the program and why were they still being trained? Did they fail to meet the criteria? Or were they fired?
9. Could you break down the reason, the criteria and the contents ?
10. Where does the training take place? Each police force train them respectively at their own training center or College of Policing train them? or any other training center?"

Decision

When a request for information is made under the FoIA 2000, a public authority has a general duty under section 1(1) of the Act to inform an applicant whether the requested information is held. There is then a general obligation to communicate that information to the applicant. If a public authority decides that the information should not be disclosed because an exemption applies, it must, under section 17(1), cite the appropriate section or exemption of the Act and provide an explanation for relying upon it.

After conducting careful searches for any information relevant to your request, under section 1(1), I can confirm that **there is some information held**. We have dealt with each part of your request below:

1. Then Which training center has a responsibility for direct entry superintendent, direct entry inspector, and fast track program?

Training venues vary depending on availability and cohort numbers. Traditionally, Fast Track (FT) and Direct Entry (DE) programmes have been hosted at either the College's Ryton or Harperley Hall sites.

2. What was the reason for them to leave the program and why were they still being trained? Did they fail to meet the criteria? Or were they fired?

As of June 2019, 25 had graduated the programme, 4 had resigned and 4 remained in training. The 4 remaining in training were from the 2018 cohort and all graduated in 2020. The 4 that resigned were from earlier cohorts and not the same as the 4 still being trained.

3. Could you break down the reason, the criteria and the contents ?

Reason

With regard to the Direct Entry Superintendents, there were no programme members that failed to reach the required standard.

The reason for the resignations will be withheld under the section 40(2) – personal information exemption.

Criteria & content

Direct Entry Superintendents must undertake:

- **Two action research projects**, for which the pass mark is 50% in-line with academic accreditation. One focuses on business improvement and the other community engagement. The projects are marked at level seven, by College and Teesside University assessors.
- **A 2,000 word Reflective Account**, for which the pass mark is 50% in-line with academic accreditation. This focuses on critical incidents and is marked at level seven by College and Teesside University assessors.
- **A knowledge-based examination**, which is managed and facilitated by the College. Candidates are required to pass this bespoke multiple-choice examination (based on the curriculum that underpins the national National Police Promotion Framework (NPPF) exam at Step Two) that

assesses their knowledge and understanding of relevant law and procedure in relation to the role of a superintendent, for which the pass mark is 65%.

- **Bespoke Work-Based Assessment (WBA)** assessed by in-force assessors and subsequently quality assured. Direct Entry Superintendents must complete the following WBA units:

Unit 1 – Apply Professional Standards in Policing

Unit 2 – Provide an initial Police Response

Unit 3 – Investigation and Interviewing

Unit 4 – Provide Protection to the Public

Unit 5 – Criminal Law and Offences

Unit 6- Apply a Preventative Policing Approach

Unit 7 – Manage Information and Intelligence

Unit 8 – Policing Management and Operations 1

Unit 10 – Leadership in Policing.

4. Where does the training take place? Each police force train them respectively at their own trainin center or College of Policing train them or any other training center?

The programme involves around 20 weeks of training provided by the College. This is usually at a College of Policing site. The remainder of the programme is spent in-force, on operational rotations.

5. What was the reason for them to leave the program and why were they still being trained? Did they fail to meet the criteria? Or were they fired?

The evaluation referred to 3 different cohorts of Direct Entry Inspectors, recruited annually from 2016. The figures detailed in the evaluation are accurate as of June 2019. Those that left the programme either resigned or did not reach the required standard.

6. Could you break down the reason, the criteria and the contents?

Reason

With regard to the Direct Entry Inspectors, there were nine programme members that resigned from the programme.

The reasons for the resignations will be withheld under section 40(2), as will the number of candidates falling under each reason.

Criteria & content

Direct Entry Inspectors must undertake:

- **A community engagement action research project** for which the pass mark is 50% in-line with academic accreditation. The project is marked at level seven, by College and Teesside University assessors.
- **A 2,000 word Reflective Account**, for which the pass mark is 50% in-line with academic accreditation. This focuses on critical incidents and is marked at level seven by College and Teesside University assessors.

- **A knowledge-based examination**, which is managed and facilitated by the College. Candidates are required to pass the NPPF exam in the same way their standard track peers aspiring to the rank of inspector are. The exam assesses their knowledge and understanding of relevant law and procedure and the pass mark is 65%.
- **Bespoke WBA** (in addition to the NPPF Step Four WBA at inspector level), assessed by in-force assessors and subsequently quality assured. Direct Entry inspectors must complete the following bespoke WBA units:

Unit 1 – Apply Professional Standards in Policing

Unit 2 – Provide an initial Police Response

Unit 3 – Investigation and Interviewing

Unit 4 – Provide Protection to the Public

Unit 5 – Criminal Law and Offences

Unit 6- Apply a Preventative Policing Approach

Unit 7 – Manage Information and Intelligence

Unit 8 – Policing Management and Operations 1

Unit 9 – Policing Management and Operations 2

7. Where does the training take place? Each police force train them respectively at their own trainin center or College of Policing train them? or any other training center?

The programme involves around 20 weeks training provided by the College traditionally at a College site. The remainder of the programme is spent in-force on operational rotations.

8. What was the reason for them to leave the program and why were they still being trained? Did they fail to meet the criteria? Or were they fired?

The evaluation referred to multiple cohorts of Fast Track Inspector, recruited annually from 2014. The figures detailed in the evaluation are accurate as of June 2019. Those that left the programme either resigned or did not reach the required standard.

9. Could you break down the reason, the criteria and the contents?

Reason

With regard to Fast Track, there were six programme members that left the programme, but remained in policing, having not reached the required standard in the legislative exam.

In regards to the other candidates who resigned from the programme, the reasons and numbers of candidates falling under each reason will be withheld under section 40(2) FoIA.

Criteria

- NPPF Step 4 Work Based-Assessment.

Contents

- Managing Self and Others
- Evidence Based Practice, Creativity and Innovation

- Collective Leadership, Organisational Change and Strategic Vision
- Valuing Difference and Inclusion
- Business Acumen, Partnership Working and Political Astuteness.

10. Where does the training take place? Each police force train them respectively at their own trainin center or College of Policing train them? or any other training center?

The vast majority of FT training is provided in force. Programme members attend around 6 x 2/3 day College modules a year to supplement their in-force training.

Please find an explanation of our decision to apply section 40(2) below; your rights are provided at the end of this letter.

Yours sincerely,

Kate Kaufman | Legal Researcher
Information Management and Legal Team
College of Policing

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Website: www.college.police.uk

Section 40(2) of the Freedom of Information Act 2000 – Personal Information

Section 40(2) FoIA states:

“Any information to which a request for information relates is also exempt information if-

- (a) It constitutes personal data which do not fall within subsection (1), and
- (b) Either the first or the second condition below is satisfied.”

Essentially, under section 40(2) FoIA (by virtue of section 40(3A)), personal data of a third party can be withheld if any of the data protection principles would be breached by disclosing that data. Personal data is defined in section 3(2) of the Data Protection Act 2018 (DPA) as being:

“Any information relating to an identified or identifiable living individual”.

Section 3(3) DPA defines an identifiable living individual as:

“a living individual who can be identified, directly or indirectly, in particular by reference to –

- (a) an identifier such as a name, an identification number, location data or an online identifier, or
- (b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual”.

Under section 40(2), we have withheld the reasons candidates left the programme and the numbers of candidates falling under each reason, as we believe releasing this information may lead to the indirect identification of individuals under section 3(3)(b) of the DPA 2018. Candidates may be identified from any information released about their ‘physical, physiological, genetic, mental, economic, cultural, or social identity’. We believe releasing the reasons for their resignation, and the figures, may allow their identification to be revealed, due to the reasoning and low figures, and consequently, we will be withholding some of the reasons for their resignations, along with the figures.

The data protection principles are provided under Article 5 of the General Data Protection Regulations 2018 (GDPR). Article 5(1)(a) states that personal data shall be: “processed lawfully, fairly and in a transparent manner in relation to the data subject”. We are committed to openness and transparency and recognise the wider public interest in full disclosure of information held by the College. However, we also have a legal duty to ensure that the rights to privacy of individuals are protected and we do not believe that it would be fair to disclose the requested information.

We consider that the disclosure of the redacted information would not be fair, lawful or transparent and would therefore breach the first data protection principle under Article 5(1) (a) GDPR.

Your right of review

Under the Freedom of Information Act 2000 you have a right to request an internal review if you are dissatisfied with our handling of your request. Review requests should be made in writing (by email or post) within **40 working days** from the date of our original response. We will aim to respond to your review request within **20 working days**.

The Information Commissioner's Office (ICO)

If, after lodging a review request you are still dissatisfied, you may raise the matter with the ICO. For further information you can visit their website at <https://ico.org.uk/for-the-public/official-information/>. Alternatively, you can contact them by phone or write to them at the following address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Phone: 0303 123 1113