

**Date:** 13 August 2021

**Our Reference:** FOIA-2021-077

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

I write in response to your Freedom of Information Act 2000 ('FoIA 2000') request, dated 23/07/2021, in which you requested:

"Direct Entry schemes are those for Inspectors and Superintendents. These are national schemes run by the College of Policing (CoP).

I would like to request annual figures that show:

- How many individuals were recruited for each financial year since the scheme started broken down by rank
- How many left within 12 months (broken down by rank)
- How many left between 12 months and 24 months
- How many left between 24 months and 36 months
- How many are still serving"

**Decision**

When a request for information is made under 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.

In line with section 1(1) of the FoIA, I can confirm the College **holds some information** relevant to your request. For ease, each part of your request has been dealt with separately below:

**How many individuals were recruited for each financial year since the scheme started broken down by rank**

Information held – please see disclosure document 1.

### **How many left within 12 months (broken down by rank)**

No information is held on the specific dates candidates left the programme. Although we do not hold information on the dates that individuals resigned, we have provided in disclosure document 1, the total number of people who resigned each year. This is not indicative of how far through the programme those leavers were at the time.

### **How many left between 12 months and 24 months**

No information is held on the specific dates candidates left the programme. Although we do not hold information on the dates that individuals resigned, we have provided in disclosure document 1, the total number of people who resigned each year. This is not indicative of how far through the programme those leavers were at the time.

### **How many left between 24 months and 36 months**

No information is held on the specific dates candidates left the programme. Although we do not hold information on the dates that individuals resigned, we have provided in disclosure document 1, the total number of people who resigned each year, this is not indicative of how far through the programme those leavers were at the time.

### **How many are still serving**

No information is held on how many candidates are still serving. However, we have provided in disclosure document 1, the number of candidates who have graduated from the programme in each year. However, post-completion, officers are not obliged to inform the College if they resign from the service; therefore, the figures provided may include officers who have now left.

The exemption under section 40(2) FoIA – personal information has been applied to some figures. Any figures of 5 or less have been replaced with the phrase '5 or less'.

Your rights can be found at the end of this letter. Please find an explanation of our decision to apply section 40(2) below.

Yours sincerely,

**Kate Kaufman | Legal Advisor**  
**Information Management and Legal Team**  
**College of Policing**

Email: [FOI@college.pnn.police.uk](mailto:FOI@college.pnn.police.uk)

Website: [www.college.police.uk](http://www.college.police.uk)

## **Section 40(2) – Personal information**

Section 40(2) states that:

“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”.

As is stated above, the two main elements of personal data are: that the information must ‘relate’ to a living person and that the person must be identifiable. Information will relate to a person if it is: about them, linked to them, has some biographical significance for them, is used to inform decisions affecting them, and has them as its main focus or impacts on them in any way.

We consider that releasing low figures may lead to the indirect identification of an individual. The figures could be combined with other information in the public domain, which could lead to an indirect identification being made. This would breach data protection principles laid out in the Data Protection Act 2018.

We are committed to openness and transparency, and recognise the wider public interest in Direct Entry figures being made available. However, we also have a legal duty to ensure that the right to privacy is protected. Consequently, we do not believe that it would be fair to provide all figures in the disclosure document, and as a result, we have replaced all figures of 5 or less with the phrase ‘5 or less’.

## **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**

<b>Year</b>	<b>Programme</b>	<b>Recruited</b>
2014/2015	Direct Entry Superintendent	9
2015/2016	Direct Entry Superintendent	6
2016/2017	Direct Entry Superintendent Direct Entry Inspector	8 17
2017/2018	Direct Entry Superintendent Direct Entry Inspector	6 20
2018/2019	Direct Entry Superintendent Direct Entry Inspector	5 or less 17
2019/2020	Direct Entry Superintendent Direct Entry Inspector	5 or less 18
2020/2021	Direct Entry Superintendent Direct Entry Inspector	0 5 or less

Left during programme	Graduated	
5 or less		8
5 or less	5 or less	
5 or less		7
	6	11
	0	6
	6	14
	0	4
5 or less		16
	0 5 or less	
5 or less		16
	0	0
	0 5 or less	