

Date: 17 December 2021

Our Reference: FOIA-2021-143

RE: Freedom of Information Act 2000 Request

I write in response to your Freedom of Information Act 2000 (or 'FoIA 2000') request dated 27 November 2021 and received by the College on 30 November 2021, in which you requested the following information:

References:

A. Henriques , Richard , Sir . Independent Review of the Metropolitan Police Service's handling of non recent sexual offence investigations alleged against persons of public prominence . London (Metropolitan Police) : 2016. (House of Commons . CDP - 2016-0244) .

B. Home Affairs Committee : Oral evidence , Police conduct and complaints , Wednesday 19 May 2021 , Questions 251-333 " . (HC 140) .

C. Her Majesty's Inspectorate of Constabulary & Fire and Rescue Services . Metropolitan Police Service An inspection of the Metropolitan Police Service's response to a review of its investigations into allegations of non - recent sexual abuse by prominent people (the Henriques report) . London (HMICFRS) : 2020. ISBN : 978-1-78655-993-7 .

1. The date on which a copy of Ref . A , or parts of it , first received , and the date on which the full report was received .
2. What changes were made to training in response to Ref . A , and when were these implemented . A summary will be sufficient at this stage . Please show tracing of each change in your training to each finding and recommendations in Ref A. Please list any recommendations that have not been adopted , with copies of any explanatory information

3. A summary of information held about information that derives from or pertains to the subject matter of Ref . A , such as minutes of meetings in which it was discussed , papers with analysis or discussions of the issues , slide presentations etc.

4. A summary of materials that show exactly what the College has done in light of Ref . A to help ensure that there shall be no repeat of such cases of injustice as are described therein .

5. A bibliography from the National Police Library , from such searches as a professional librarian shall make , of physical items held , or accessible electronically , by the Library , that relate to :

a) Ref . A.

b) how organizations allow major faults to take place , especially the group dynamics or psychological aspects . I have in mind here titles such as Vaughan , Diane . Challenger Launch Decision : risky technology , culture , and deviance at NASA . Chicago IL (University of Chicago Press) : 1996. ISBN : 0 226 85175 3 ; and Milgram , Stanley . Obedience to Authority : an Experimental View London (Tavistock) : 1974 .

c) Risk management .

6. Copies of examples from actual cases of graphical representations of root causes of organizational failure , particularly diagrams such as Ishikawa diagram , fault trees and similar diagrams that aim to analyse and show the causal factors behind a major fault .

7. (a) A summary of information held , including a bibliography , of information about how the police in particular and organizations generally resist change despite evidence of the need to change . I have in mind here the disappointing reaction to Ref . A , but my question is general . Also (b) a copy of the latest and best training material or guide for the College's senior students on this issue .

8. A copy of the latest and best training materials for (a) the most senior and (b) the most junior students at the College on , broadly , how to avoid repeating the mistakes identified in Ref . A.

9. A summary , including bibliography , of materials held , in (a) the Library , in the form of a bibliography , and (b) outwith it , of how language matters in policing . My question is general , but I have in mind the debate in the police forces as to whether to use " suspect " or " victim " , which is a matter of great significance in Ref . A and much that follows from it .

10. A summary , including bibliography , of materials held , in (a) the Library , in the form of a bibliography , and (b) outwith it , of how police should identify and handle suspected cases of torture or inhuman and degrading treatment , including policy , procedures , personal skills , and relevant laws .

11. A summary, including bibliography , of materials held , in (a) the Library , in the form of a bibliography , and (b) outwith it , of human dignity , per the HRA , including policy , procedures , personal skills , and relevant laws .

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.

It is important to note that a freedom of information request is not a private transaction. Both the request itself and any information disclosed are considered suitable for open publication, that is, once access to information is granted to one person under the legislation, it is then considered public information and must be communicated to any individual should a request be received. In light of this, our responses and disclosures are published on our external website at a later date.

Decision

After carefully considering your request we consider that section 12 of the FoIA 2000 is engaged. Section 12(1) of the Act provides that a public authority is not required to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit. That limit is set within regulations and equates to 18 hours work.

As part of the consideration of your request, I consulted with the National Police Library and asked them to give an indication of how long it would take to provide the bibliographies requested at points 5, 7, 9, 10 and 11. They provided the following breakdown of the work required and an estimated time for each search.

1 Request Analysis / Search String Development – prepare and plan each question (considering terminology, to meet the needs of the FOI), develop search string/s for each question - 1hr

2 Colleague comparison – professional discussion to ensure proposed search/es meet the needs of the question. Tailor search/es accordingly to feedback. 45mins

3 Run search/es – analyse results – meeting the needs of the question – tailor search/es if required. Select appropriate results using professional knowledge 3hrs

4 Write and summarise results into an annotated bibliography using the Harvard method. Add bibliography to a master report. Include search string/s &url's 2 hrs

Total for each question – 6.45hrs

Based on these estimations, to provide the bibliographies alone would take us beyond the appropriate limit and therefore the request, as a whole, is refused under section 12.

In accordance with our duty to provide advice and assistance, I wish to advise you that it became evident when considering the request and consulting with the subject matter experts within the College that the wording of the request was open to interpretation and was potentially very wide in scope. If you choose to submit a refined request, you may wish to consider being more specific in the information you are requesting or providing further detail to assist us in establishing whether that information is held.

You may also find the following response to a previous FOI request useful when considering refining or refocusing your request: <https://assets.college.police.uk/s3fs-public/2021-01/FOIA-2020-075.pdf>

Your rights are provided in **Appendix A**.

Yours sincerely,

Sarah Lawrence | Legal Advisor
Information Management and Legal Team
College of Policing

Email: FOI@college.pnn.police.uk

Website: www.college.police.uk

Appendix A

Rights

If you are dissatisfied with the handling procedures or the decision of the College of Policing made under the Freedom of Information Act 2000 (the Act) regarding access to information you can request that the decision is reviewed internally.

Internal review requests should be made in writing, within **forty (40) working days** from the date of the refusal notice, and addressed to: FOI team, Central House, Beckwith Knowle, Otley Road, Harrogate, North Yorkshire, HG3 1UF or email: FOI@college.pnn.police.uk

In all possible circumstances the College of Policing will aim to respond to your request for internal review within **20 working days**.

The Information Commissioner

If, after lodging an internal review request with the College of Policing you are still dissatisfied with the decision you may make application to the Information Commissioner for a decision on whether the request for information has been dealt with in accordance with the requirements of the Act.

For information on how to make application to the Information Commissioner please visit their website at <https://ico.org.uk/for-the-public/official-information/>.

Alternatively, write to:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Phone: 0303 123 1113