

**Date:** 30<sup>th</sup> April 2021

**Our Reference:** FOIA-2021-044

**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 **16/04/2021**, in which you requested:

"Please provide as much of a concise list of job roles held within the organisation and their required vetting levels as possible that you hold."

**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.

In line with section 1(1) of the FoIA 2000, I can confirm the College **does hold information** relevant to your request.

Within disclosure document 1, we have provided a list of job titles within the organisation, as at 31/03/2021. It must be noted that the College does not have information held on 'job roles', but rather 'job titles'.

The vetting levels have been withheld in their entirety under the section 40(2) – Personal information exemption. All our staff are vetted at levels deemed appropriate to their roles.

Your rights are provided at the bottom 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 the vetting levels, combined with the list of job titles may lead to the indirect identification of a living individual, therefore breaching 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 details of College employees, however, we also have a legal duty to ensure that the right to privacy of individuals is protected.

Consequently, we do not believe that it would be fair to disclose the vetting levels as part of this request. Therefore, we have either withheld all vetting levels in their entirety.

## **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**

JobTitles

20k Adaptive Delivery Manager  
20K Uplift Lead  
20K Uplift Programme Director  
Accounts Administrator - AP & AR  
Accreditation Manager  
Accreditation Registrar  
Acting National CMO Adviser  
Administrator  
Analyst  
Application Support Analyst  
Applications Specialist  
Approved Provider Scheme Manager  
Assessment Centre Quality Coordinator  
Assessment Centre Quality Manager  
Assessment Centre Site Coordinator  
Assessment Manager  
Assessment Officer  
Assistant Financial Accountant  
Assistant Librarian  
Assistant Research Librarian  
Assistant Systems Librarian  
Assoc Graphic Designer/Artworker  
Benefits Manager  
Bids & Contracts Manager  
Business & Project Manager  
Business Administration Coordinator  
Business Administration Manager  
Business Analyst  
Business Change & Assurance Lead  
Business Change Analyst - Fast Streamer  
Business Change Manager (Metis)  
Business Client - Selection & Assessment  
Business Continuity Manager  
Business Coordinator  
Business Co-ordinator (OD&Internat)  
Business Coordinator CAA  
Business Coordinator Digital Services  
Business Development Mgr-LdrShip&Talent  
Business Manager  
Business Manager - Future Leaders Hub  
Business Safety and Environment Lead  
Business Systems Architect  
Business Systems Product Owner  
Business Systems Support Officer  
CCD National Training Coordinator  
CCD Training & DMI Implementation Lead  
CDCP Portfolio Support Officer  
CED Taser Trainer & Training Designer  
Centre Support Officer  
CEO

Change Programme Communications Lead  
Change Programme Office Coordinator  
Chief Digital Officer  
Chief Inspector - Operation Hampshire  
Chief of Staff  
Civil Contingencies & DVI Co-ordinator  
Client Services Manager  
Collaboration & Systems Specialist  
Collections Librarian  
Command Training Lead-Public Order Gold  
Content Creator  
Copyeditor  
Corporate Strategy & Policy Lead  
Corporate Strategy and Policy Adviser  
COVID-19 College Response Lead  
CPCD Deputy Project Manager  
Creative, Design & Publishing  
Curr Quals & Apprenticeships Advisor  
Curr Quals & Apprenticeships Snr Adv  
Custody Liaison Manager  
Customer Contact Centre Advisor  
Customer Contact Centre Agent  
Customer Contact Centre Manager  
Customer Contact Centre Team Leader  
Customer Services Manager  
Customer Support Engineer  
Customer Support Manager  
Customer Support Team Leader  
Cyber First Project Officer  
Data Analyst  
Data Manager  
Data Protection Manager  
Data Protection Officer  
Database Administrator  
Database Manager - Digital Services  
Delivery Coordinator  
Delivery Manager  
Delivery Manager - Investigation  
Delivery Services Co-ordinator  
Deputy Data Protection Manager  
Deputy Head of Corporate Communications  
Developer  
Digital Designer  
Digital Production Manager  
DII Admin Support  
DII Capability improved Hub Coordinator  
DII Copy Editor  
DII Deputy Project Lead  
DII Engagement Officer  
DII Learning Designer  
DII Portfolio Support Officer

DII Project Lead  
DII Team Leader  
DII Test Manager  
Director - National Police Wellbeing Svc  
Director of Enabling Services  
Director of Knowledge & Innovation  
Director of Operational Standards  
Director of Workforce Development  
Diversity & Inclusion Advisor  
Diversity & Inclusion Advisor (Practice)  
Diversity & Inclusion Manager  
Diversity Inclusion & Engagement Officer  
Edn & Professional Development Designer  
EEA - Crime and Criminal Justice  
E-Learning Test Manager  
Engagement Manager  
Engagement Officer  
Estates Project Manager  
Events Coordinator  
Events Co-ordinator  
Events Officer  
Events Team Leader  
Evidence & Evaluation Adviser  
Evidence & Evaluation Advisor  
Executive Assistant (CEO)  
Executive Assistant (Enabling Servs)  
Executive Assistant (K&I)  
Executive Assistant (Ops Stds)  
Executive Assistant (WFD)  
Executive Police Adviser  
Facilities Manager - Harperley Hall  
Facilities Manager (Ryton)  
Faculty Lead - Crime & Criminal Justice  
Faculty Lead - Uniformed Policing  
Finance Assistant  
Finance Business Partner  
Finance Manager  
Financial Accountant  
Financial Controller  
Financial Modelling Specialist  
Financial Transaction Officer  
Financial Transactions Manager AP & AR  
Firearms & LLW Curriculum Designer  
Firearms & LLW Curriculum Manager  
Firearms Specialist Adviser  
Firearms Training Licence & Range Cert  
Firearms Training Licence&Range Cert Mgr  
Firearms Training&Range Licensing Assess  
Fleet and Transport Manager  
Fleet Assistant  
FT and HPDS Lead

FTDE Project Officer  
FTDE Senior Curriculum & Policy Advisor  
Governance Manager  
Graphic Designer  
Hd of Diversity, Inclusion & Engagement  
Hd of Information Governance & Legal Svc  
Head of Business Improvement  
Head of Business Services  
Head of Corporate Communications  
Head of Curr Quals & Apprenticeships  
Head of Delivery Services  
Head of Diversity & Inclusion  
Head of Finance&Performance Improvement  
Head of Financial Strategy  
Head of Governance  
Head of HR Operations  
Head of Imp & Quality Assurance  
Head of Learning Delivery  
Head of Learning Design  
Head of People & Organisation Developmnt  
Head of Performance Planning & Risk  
Head of Procurement  
Head of Selection & Assessment  
Head of Service Management & Integration  
Head of W/F Development & Progression  
Head of Workforce Development Enablers  
Health & Safety Coordinator  
Higher Psychologist.  
HR Admin Assistant (Apprentice)  
HR Administrator  
HR Advisor  
HR Advisor-OD  
HR Business Partner  
ICT Learning and Standards Manager  
ICT Learning Delivery Manager  
Immersive Learning & Standards Manager  
Immersive Learning Developer  
Implementation Coordinator - Day One  
Implementation Manager (Day One)  
Information Life Cycle Manager  
Information Quality Coordinator  
Information Security Assurance Officer  
Information Services Project Leader  
Information Specialist  
Infrastructure Manager  
Infrastructure Services Engineer  
Infrastructure Transition Lead  
Innovation & Knowledge Sharing Manager  
Insight Analyst  
Instructional Designer  
Int Liaison Officer (Americas&Caribbean)



Int Liaison Officer (Asia & China)  
Int Liaison Officer(Mid East & N Africa)  
Int Police Advisor (Mid East & N Africa)  
Intern  
Internal Comms & Engagement Manager  
Internal Comms & Engmnt Business Partner  
Internal Engagement Advisor  
International Liaison Officer  
International Policing Advisor  
Int'l Forensic Business Development Mgr  
IP & Licencing Assistant  
IS Application Database Manager  
IS Project Manager  
IS Security Manager  
IS Snr Product Owner&Technical Architect  
IT Business Systems Analyst  
IT Infrastructure Services Manager  
Junior Videographer & Photographer  
Knowledge & Information Specialist  
Knowledge Research & Practice Lead  
Knowledge Services Manager  
Lead Product Manager  
Leadership Delivery Advisor  
Leadership Development Manager  
Leadership Review Project Devmt Mgr  
Learning Design Specialist  
Legal Advisor  
Legal Services Manager  
Library Assistant  
Licensing & IPR Manager  
Logistics Administrator  
Marketing Account Partner  
Media Relations Manager  
Mental Health Coordinator  
NCDS Producer  
NPWS Administrator  
NPWS Delivery Sergeant  
NPWS Fleet Logistic Manager  
NPWS Fleet Logistic Support Officer  
NPWS Trainer  
NPWS Trauma & Wellbeing Dog Project Lead  
Occupational Health SME  
OD Delivery Manager  
OK NPWS Comms & Engagement Officer  
OK NPWS Comms Dig & Engage Manager  
OK NPWS Live Service Coordinator  
OK NPWS Live Service Manager  
OK NPWS Live Service Officer  
OK NPWS Support Officer  
Online Knowledge Officer WWCCR  
Org Dev Wellbeing Lead

P Stds Mgr - Business Chnge & Efficncy  
P Stds Mgr - Ethics Integrity & Prof Std  
P&OD Engagement Officer  
PA to Senior Leader  
Painter and Decorator  
Pay and Reward Manager  
Payroll Manager  
Peer Support Manager  
PEQF Imp & Comms Manager  
PEQF Implementation Officer  
PEQF Implementation Team Lead  
PEQF Programme Approval Manager  
PEQF Programmes Regulations Snr Advisor  
PEQF Quality Assurance Team Leader  
Performance&Improvement Proj Supp Off  
Performance, Planning & Risk Officer  
Personal Assistant  
Personal Safety Curriculum Designer  
Physical Security Manager  
PIP Level 3 Registrar  
PMO Coordinator  
Policing Practice Developer  
Policing Stds Mgr - Career Dev Staff  
Policing Stds Mgr - Counter Terrorism  
Policing Stds Mgr - Criminal Justice  
Policing Stds Mgr - Cyber Crime  
Policing Stds Mgr - Investigations  
Policing Stds Mgr - Joint Operations  
Policing Stds Mgr - Local Policing  
Policing Stds Mgr - Public Protection  
Policing Stds Mgr - Serious & Org Crime  
Policing Stds Mgr - Specialist ops  
Policy Advisor  
Policy Lead  
Portfolio Coordinator  
Portfolio Support Officer  
Practice Manager  
Principal Analyst  
Privacy & Information Coordinator  
Procurement & Contracts Assistant  
Procurement & Contracts Manager  
Procurement Support Specialist  
Producer  
Product Development Officer  
Product Manager  
Products Manager  
Professional Development Manager  
Programme Manager  
Programme Mgt Office&Assurance Mgr  
Project Improvement Manager  
Project Improvement Support Officer

Project Manager  
Project Manager - Cyber First  
Project Manager - Wellbeing  
Project Support Officer  
Property Manager  
Property Programme & Project Manager  
PSM Vision 2025 Info Mgmt & Digitisation  
Psychologist  
Psychologist Team Leader  
Psychologist Team Leader - Exams  
Public Affairs & Stakeholder Eng Manager  
Public Order & Safety Curriculum Designer  
Public Order and Public Safety Lead  
Public Order Curriculum Manager  
Public Order Gold Command Lead  
Quality and Process Manager  
Quality Assurance & Evaluation Adviser  
Quality Assurance Adviser  
Quality Assurance Advisor  
Radio Frequencies Technician  
Reprographics Assistant  
Reprographics Manager  
Research & Analysis Stds Manager  
Research & Evidence Partnerships Manager  
Research Officer  
Research Officer (Cost Effectiveness)  
Resourcing Team Leader  
Roads Policing and Stop&Search Advisor  
Security Manager  
Sen Quads Equality & Regulations Manager  
Senior Administrator  
Senior Analyst  
Senior Application Specialist  
Senior Conference & Events Officer  
Senior Engagement Advisor  
Senior Engagement Officer  
Senior Ethics and EDI Business Partner  
Senior Finance Business Partner  
Senior Finance Manager  
Senior HRBP People Policy and Reward  
Senior Infrastructure Engineer  
Senior Infrastructure Support Engineer  
Senior Leaders Hub Coord - Appointments  
Senior Leaders Hub Coord - Development  
Senior Leaders Hub Dev Advisor  
Senior Leaders Hub Manager  
Senior Leadership Trainer  
Senior Media Officer  
Senior OD Business Partner  
Senior Policy Advisor  
Senior Practice Developer

Senior Product Manager  
Senior Psychologist  
Senior Reprographics Officer  
Senior Research Officer  
Senior Scheduling Co-ordinator  
Senior Statistical Officer  
Senior Team Leader  
Service Delivery Manager  
Service Manager  
Sgt - Public Order - Uniform Ops Support  
SME Neighbourhood Policing  
Social Media Executive  
Social Media&Digital Engagement Adviser  
Software Developer  
Software Development Mgr  
Specials & Volunteers Manager  
Staff Officer  
Stores Controller  
Strategic & Business Improvement Analyst  
Strategic Comms & Campaigns Manager  
Strategic Firearms Command Lead  
Subeditor  
Systems Support Officer  
Team Leader  
Technical Officer  
Technical Officer Logistics  
Technical Officer-Selection & Assessment  
Technical Portfolio and Change Manager  
Technical Skills Support Manager  
Technical Skills Trainer  
Technical Skills Trainer - HUMINT  
Technical Skills Trainer - Search  
Test Manager  
Trainer  
Trainer (High Tech Crime)  
Trainer (Search)  
Trainer CD  
Trainer Curriculum & Qual Designer  
Trainer Development & Standards Manager  
Training & Development Officer  
Training Design Team Lead  
Training Team Manager  
Transformation Programme Manager  
TTM - Search  
TTM - Serious & Organised Crime  
TTM - Surveillance  
Web Content Manager  
Web Developer  
Web Editor  
Website Content Executive  
WForce Transform Prof Dev Senior Advisor

What Works Practice Information Manager  
Workforce Transformation & Prof Dev Adv