

**Date:** 18<sup>th</sup> May 2021

**Our Reference:** FOIA-2021-053

**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 **05/05/2021**, in which you requested:

"1) The Career Pathways Workshop - Please can you tell me how many officers and how many staff attended this course? I am looking for a breakdown of officers compared to staff figures. Can you provide me with the last 3-5 years?"

2) Strategic Command Course - Please can you tell me how many officers and how many staff attended this course? I am looking for a breakdown of officers compared to staff figures. Can you provide me with the last 3-5 years?"

3) Senior Leadership Development Course - Please can you tell me how many officers and how many staff attended this course? I am looking for a breakdown of officers compared to staff figures. Can you provide me with the last 3-5 years?"

**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.

In line with section 1(1) of the FoIA 2000, I can confirm the College **does hold information** relevant to your request. We have dealt with each part of your request separately below.

However, all figures of 5 or less have been replaced with the phrase '5 or less' under the section 40(2) - Personal information exemption. Please find an explanation of our decision to apply this exemption towards the end of the letter.

**The Career Pathways Workshop**

<b>Year</b>	<b>Officers</b>	<b>Staff</b>
2020	72	20
2019	51	12

2018	64	26
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### Strategic Command Course

Year	Officers	Staff
2020	36	6
2019	37	6
2018	30	5 or less
2017	36	5 or less
2016	32	5 or less

### Senior Leadership Development Programme

Year	Officers	Staff
2020	36	10
2019	106	37
2018	60	90
2017	240	238
2016	122	149

It should be noted that the data captured for the Senior Leadership Development Programme does not reflect the true number of officers and staff in attendance, due to recording measures. In reality, the number of attendees is predominantly made up of police officers.

Your rights are provided at the bottom of this letter.

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.

Consequently, we have replaced all figures of 5 or less, with the phrase ‘5 or less’ to prevent any low figures being released. We consider that releasing figures of 5 or less, may, when coupled with other information in the public domain, lead to the indirect identification of a living individual, and would therefore 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 candidate information. 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 names on the requested information.

## **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**