



13th January 2019

Freedom of Information Request Reference N°: FOI 004254/19

I write in connection with your request for information received by the Norfolk and Suffolk Constabularies on the 22nd November 2019 in which you sought access to the following information:

- 1 Please confirm which commercial providers of training the force has used in the last 12 months if any?
- 2 Please confirm the value of training services purchased in the last 12 months
- 3 Please confirm the type of training services purchased in the last 12 months
- 4 How much apprenticeship levy training has the force purchased in the last 12 months?
- 5 Please confirm the type of apprenticeships the organisation uses the apprenticeship levy training fund for.

Response to your Request

The response provided below is correct as of 27th November 2019.

Norfolk and Suffolk Constabularies have considered your request and our response is below.

Research has been undertaken of costs allocated to training spend between October 2018 and November 2019. It should be noted that some of the costs relate to accommodation, training facilities, etc. Additionally, there are costs paid to other Constabularies, education establishments, NHS Trusts and the College of Policing, which we would not consider as commercial training providers.

Q1/3 Please see training details below. The type of training is not always recorded:-

Behavioural Measures UK	Polygraph
Blackbag Technologies Inc	Training Forensics
Carmar Consultants – The Professional Standard Ltd	Advanced Response Driving
Cellebrite UK Ltd	Course
Central Law Training Ltd	Legal Training
Communicating Matters – ABELS Ltd	ABELS Training
Control-F Ltd	Training Forensics
Delight Training Services Ltd	MAPPA Training
Denise Nathan Consultancy Ltd	Senior PNAC
DEWVA	Professional Development
Dr Brendan O’Mahony	Op Hydrant Workshop

Drone Training Ltd (The Aerial Academy)	Drone Training
Drystone Chambers	No details
Eastern Horizon Training	Broadsbeat Training & First Aid
ERAS Ltd	Quest Profiles
Essex & Suffolk School of Purchasing	Level 4 CIPS
Evac Chair International Ltd	Key Trainer Master Class
F3 First Forensic Forum	Training Forensics
Firebrand Training Ltd	Cyber Training
Fitt Healthcare Training Services	First Aid at Work
Force Information Systems Ltd	Training PSD
Getty Images International	Media Content Training
Insight Direct (UK) Ltd	Blackberry Training
Institution of Occupational Safety & Health	IOSH Event
IT Governance Ltd	DPA & DPIA Training
Ivstitia Ltd	RJ Training / Licence
James Traynor	CAID Training
Jarrold Training	Excel/Powerpoint/Publisher/Report Writing
Limeculture Ltd	Independent Sexual Violence Advisor Development Programme
Magnet Forensics Inc	Training Forensics
Marie Collins Foundation	Conference
Mental Health First Aid England CIC	Mental Health First Aid Training
MJJ Consulting	Firearms Training
North Wales Active Ltd	Police Cadet Training
Northgate Public Services (UK) Ltd	PENTIP Training
Petans Ltd	Personal Survival Techniques
Phil Mitchell	CSE Training
Phixos Ltd Training as Ruas	Pilot Training
Plain English Campaign Ltd	Writing Course
Police Crime Prevention Initiatives Ltd	PCPA Designing Out Crime Module
Primary Care Commissioning CIC	SIO Conference
QA Ltd	Prince & IT Training
RISC (Research and Intelligence Support Centre)	Analysis Course
Road Safety Support Ltd	RSS Training
Roma Support Group	Roma Culture Awareness
Safelives	Domestic Abuse Training
Sancus Solutions Ltd	PSD Investigators Course / Road Death Lead Investigator Course
Serco Ltd Emergency Planning College	Wildlife Crime Conference / Emergency Planning Course
Simply Mindfulness Norwich	Mindfulness Course
SJ Events Consultancy Ltd	Community Safety Event

Skillstec	iPAF Training
Specialist Security Training	SFIC Training
Duke Of Edinburgh's Award	Police Cadet Training
The Heightec Group Ltd	Climbing Course & Hazards Course
The Investigator	Child Protection
The Knowledge Academy Ltd	MSP & Prince
The Survivors Trust	Violence Advisor Training
The Wildlife Works	Wildlife & Countryside
The Yana Project	Mental Health First Aid Training
Total Comms Training Ltd	Fibre Training Course
Westminster Forum Projects	Comms Seminar
Why Me?	No details
Wildlife Training Consultancy	Wildlife Crime Officers Course
YHA (England & Wales)	Police Cadets Outward Bound
YHA Castleton	Police Cadets Outward Bound
Yoga With Rosie	Yoga Training
Exempt - Section 40	Firearms Training
Exempt - Section 40	Communication Course

- Q2 Between October 2018 and November 2019, the total costs allocated to training spend was £686,196.66
- Q4 The Suffolk spend is £8929.27. There has not been any spend from the Norfolk Levy account.
- Q5 All spend is associated with Senior Leader Masters Degree: Apprenticeship Level 7.

Section 40

Where training has been provided by a named individual and the details are not already in the public domain, the name has not been provided and the exemption at section 40 engaged.

- **Section 40(2) Personal Information**

Section 40 is an absolute; class based exemption and applies to third party personal data. This would not be released under the FOIA unless there is a strong public interest. This is because any release would breach the Principles contained within Article 5(1) of the GDPR and Part 2 of the Data Protection Act 2018.

One of the main differences between the Data Protection Act and the Freedom of Information Act is that any information released under FOI is released into the public domain, not just to the individual requesting the information. As such, any release that identifies an individual through releasing their personal data, even third party personal data, is exempted unless there is a strong public interest in its release. The public interest is not what interests the public but what benefits the community as a whole.

Personal data is defined under the Data Protection Act as data that is biographical in nature, has the applicant as its focus and/or affects the data subject's privacy in his or her personal, professional or business life.

Principle A of Article 5(1) states that information must be processed fairly, lawfully and in a transparent manner. In this case the individuals would have a reasonable expectation that information would not be processed if it related to their personal data.

FOIA disclosures are to the world at large and will remain in the public domain indefinitely. Therefore, provision of this information would exceed the original requirement for the processing of the information and would not be lawful or fair to the individuals in question.

It is for these reasons outlined above; that I feel the principle A would be breached by this disclosure and the Section 40 exemption remains in place. I am not obliged to consider any further principle in my arguments.

This is an absolute, class-based exemption and, as such, there is no requirement to consider the public interest test.

This response will be published on the Constabularies web-site under the Freedom of Information pages:-

<https://www.norfolk.police.uk/about-us/our-data/disclosure-log>

<https://www.suffolk.police.uk/services/freedom-information/disclosure-logs>

Should you have any further queries concerning this request, please contact Amanda Gibson, FOI Decision Maker, quoting the reference number shown above.

A full copy of the Freedom of Information Act (2000) can be viewed on the 'Office of Public Sector Information' web-site;

<http://www.opsi.gov.uk/>

Norfolk and Suffolk Constabularies are not responsible for the content, or the reliability, of the website referenced. The Constabulary cannot guarantee that this link will work all of the time, and we have no control over the availability of the linked pages.

Your Right to Request a Review of Decisions Made Under the Terms of the
Freedom of Information Act (2000).

If you are unhappy with how your request has been handled, or if you think the decision is incorrect, you have the right to ask the Norfolk and Suffolk Constabulary to review their decision.

Ask Norfolk and Suffolk Constabularies to look at the decision again.

If you are dissatisfied with the decision made by Norfolk and Suffolk Constabularies under the Freedom of Information Act (2000), regarding access to information, you must notify the Norfolk and Suffolk Constabulary that you are requesting a review within 40 days of the date of its response to your Freedom of Information request. Requests for a review should be made in writing and addressed to:

*Freedom of Information Decision Maker
Information Management Department
Norfolk Constabulary
Operations and Communications Centre
Jubilee House
Falconers Chase
Wymondham
Norfolk NR18 0WW
OR
Email: freedomofinformation@norfolk.pnn.police.uk*

In all possible circumstances Norfolk and Suffolk Constabulary will aim to respond to your request for us to look at our decision again within 20 working days of receipt of your request for an internal review.

The Information Commissioner.

After lodging a request for a review with Norfolk and Suffolk Constabulary, if you are still dissatisfied with the decision, you can apply 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 www.ico.org.uk or contact them at the address shown below:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 01625 545 700