

Date: 28th October 2020

Our Reference: FOIA-2020-120

Your Reference: N/A

RE: Your request for information under the Freedom of Information Act 2000 (“FOIA 2000”)

I am writing regarding your email dated 2nd October 2020 in which you requested information regarding our international training, and gifts received, as below:

1. How many days of training has the College of Policing provided to Saudi police and military in each of the last five full calendar years, plus 2020 to date?
2. What rank were the police and military service people who received the training over the stated period?
3. How much in total was the College of Policing paid for the training over the stated period?
4. What gifts have College of Policing employees received from people in Saudi Arabia over the stated period?

Decision

I can confirm that the College of Policing holds information relevant to your request however some information is to be withheld because a number of exemptions apply:

- Section 27 – International Relations
- Section 31 – Law Enforcement
- Section 43 – Prejudice to Commercial Interests

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.

With this in mind, we are able to provide you with the following information:

In the last five full calendar years, plus 2020 to date, the College has provided the following to Saudi Police and military:

Year	No. days training provided
2015	505
2016	245
2017	170
2018	482
2019	0
2020	0

There is no information held on the rank of those who received the training.

Information regarding gifts received by the College can be found on our external website here:

<https://www.college.police.uk/About/Transparency/Pages/Transparency.aspx>

In addition to this information, I can confirm that we have records of '1 x Saudi Arabia Commemorative Coin' being transported from the College of Policing Sunningdale site to the Ryton site on March 2017. The date of receipt and value of this item is unknown.

Details of income generated from international training from 2013 to 2019 can be found here:

https://www.college.police.uk/What-we-do/Learning/International-Academy/Documents/International_Income_Jan_2013_to_Dec_2019.pdf

Additional context about our international work and further detail on the categories in the table above can be found on our external website here:

<https://www.college.police.uk/What-we-do/Learning/International-Academy/Pages/International-FAQ.aspx>

Having carefully considered your request, we are unable to provide any further detail because a number of exemptions apply, namely, section 27(1)(a), (c) and (d) (International Relations), section 31(1)(a) (Law Enforcement) and section 43(2) (Prejudice to Commercial Interests).

The above exemptions require me to consider the prejudice or harm that would, or would be likely, to result from disclosure. I must then go on to consider the public interest test, this requires a consideration of the arguments on both sides as to whether the public interest in disclosure is outweighed by any harm that disclosure may cause. The arguments in relation to prejudice/harm and the public interest test are inter-dependent and so I have amalgamated them under each exemption below.

Section 27 – International Relations

(1) Information is exempt information if its disclosure under this Act would, or would be likely to, prejudice—

- (a) relations between the United Kingdom and any other State,
- (b)
- (c) the interests of the United Kingdom abroad, or
- (d) the promotion or protection by the United Kingdom of its interests abroad.

Section 27(1) (a), (c) and (d) are relevant to your request. The College accepts that releasing the income from the training we have delivered around the world would be of interest to the general public. We agree that to disclose this information would bring greater transparency and aid the public in being able to see the nature of the work we do and the way in which we have supported international policing. It would also help to provide more detail on the ways in which the College is able to generate additional revenue to the grant-in aid received from the Home Office.

However, section 27(1) (a), (c) and (d) also recognise that the effective conduct of international relations is reliant upon an open dialogue between the College and its international clients, partners and other stakeholders in maintaining the trust and confidence of those with we choose to work with. If we fail to do so, the interests of the United Kingdom abroad may be adversely affected. Providing detail on the specific training delivered to particular countries and regions (over and above the broader information published on our website) could potentially damage the bilateral relationship between the UK and our international clients. This would significantly reduce our ability to promote UK interests abroad and may potentially affect the relationships we have with those clients, as well as any prospective clients that may wish to work with us in the future.

The College is committed to openness and transparency and we accept that we have a duty to share detail about our work, where we are able to do so. With this in mind, over recent years, our International Faculty have published considerable information via our external website which you can access via the link provided earlier in this letter.

You will see that we have listed the countries we work with, highlighted the broad areas of our international work coupled with the overall income generated and provided information about the international leadership courses that we offer here in the UK. We are committed to publishing relevant information, wherever we can, and where this would not jeopardise our relations with other states or affect our ability to protect or promote the UK's interests abroad.

We are also of the view that the release all of the information you have requested might contribute to the 'mosaic' effect. This can occur where the information you are seeking is paired with additional information already in the public domain. This may result in an increase in the likelihood of harm resulting if the disclosure takes place. Some of the information you have requested may, at first glance, seem fairly unremarkable, however we have to consider what information may have been released in the past, what information partner agencies may have released and any other information that might be available in the public domain. The request cannot be taken in isolation and it is right to consider how the totality of any information might fit together.

On balance, we consider that the harm of disclosure and the public interest in withholding the information outweighs the public interest in disclosing the information to you.

Section 31(1)(a) – Law Enforcement

As a publicly funded body and from an ethical perspective, the College accepts it has a duty to make appropriate information available to the public wherever possible. We appreciate that there is a public interest in the nature of the training provided by the College to our international clients and our International Faculty publish information, wherever possible, in order to better inform the public about the work that we do. Additionally, we appreciate that spending of public money and a public authority's ability to generate income, are matters of strong public interest.

However, the College must also consider the wider impact of disclosing specific detail about our international training. By the very nature of our work, the disclosure of the information requested carries the potential risk of highlighting areas of weakness within a country or police force. The possible disclosure of law enforcement capabilities and funding, or lack thereof, in certain countries may have a negative impact on law enforcement operations, both in the UK and abroad. This in turn could increase the risk to the safety of the public and indeed law enforcement personnel in those countries with which we engage. Disclosure could hinder the effective prevention and detection of crime as it has the potential to reveal gaps in the capabilities and funding within those countries. Disclosure of information that undermines the

operational integrity of law enforcement capabilities is highly likely to have an adverse impact on public safety and a negative effect on law enforcement generally. This risk to public safety cannot be said to be in the public interest.

As stated above, the public interest test is a consideration of whether the community benefit of possession of the information outweighs the potential harm. It is not an evaluation of what interests the public. On weighing up the competing interests, I consider that the public interest test favours withholding the finer detail of the requested information. We are committed to being as open and transparent as possible about the work that we do and it is with this in mind that we publish a list of all the countries we have worked with, along with details of overall income generated.

Section 43(2) – Prejudice to commercial interests

As a publicly funded body and from an ethical perspective, the College accepts it has a duty to make appropriate information available to the public wherever possible. We appreciate that there is a public interest in the income generated by the training provided by the College to our international clients and our International Faculty publish information, wherever possible, in order to better inform the public about the work that we do. Additionally, we appreciate that spending of public money and a public authority's ability to generate income, are matters of strong public interest.

However, the College must also consider the wider impact of disclosing detail about the income generated by our international training. Disclosure of income from specific countries and/or organisations would be likely to be prejudicial to the commercial interests of the College. There is a public interest in withholding information which, if disclosed, would reduce the ability of the College to compete in a commercial environment. Revealing details of income generation would be detrimental to the College's ability to negotiate other contracts and procurements, allowing exploitation for profit or other gain. In addition to this, disclosure of certain information would result in loss of customer confidence and damage the relationship of trust that we have with the countries/organisations for which we offer international support and training and, in turn, damage the commercial interests of the College through loss of trade.

On balance, we consider that the harm of disclosure and the public interest in withholding the information outweighs the public interest in disclosing the information to you.

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

Yours sincerely,

Abi Robertson | Legal Services Manager
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