



Date: 16 June 2020

Our Reference: FOIA-2020-054

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

“With regard to section 7.9 -7.15 financial checks, please supply the following information.

Please provide all source documentation that was used in producing the policy to support the assumption that an individual experiencing financial difficulties is a greater risk than an individual not experiencing financial difficulties of 'becoming vulnerable to financial inducement.'

Please further supply all source documentation that was used in producing the policy to support the assumption that individuals with a County Court Judgement (CCJ) are a greater risk than individuals experiencing financial difficulties without having a CCJ, or individuals with no financial difficulties with respect to 'becoming vulnerable to financial inducement.'

If there is no evidence available to support these assumptions, please clearly state that the College of Policing have no evidence to demonstrate those in financial difficulties (with or without CCJ) are a greater risk to 'becoming vulnerable to financial inducement.'

Please provide all evidence that demonstrates all information used when deciding upon section 7.9 Financial Checks when producing the APP Vetting May 2019 policy document.

Please clearly state if no evidence was taken into account when writing Section 7.9 -7.15 Financial Checks when producing the APP Vetting May 2019 policy document.

Please provide the numbers of currently serving Police staff in England known to have financial difficulties, the number of currently serving Police staff to have CCJ(s), and the number of currently serving Police staff who are Bankrupt (discharged and undischarged). If the these numbers are not known, please state that the numbers are unknown.

Please confirm that it is known within the Police Forces of England and the College of Policing that there are currently serving Police Officers, and Police staff who have active CCJ(s) and bankruptcy.”

Decision

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. This should be borne in mind where a request is made for personal data of named individuals.

College of Policing Limited is a company registered in England and Wales, with registered number 8235199 and VAT registered number 152023949. Our registered office is at College of Policing Limited, Leamington Road, Ryton-on-Dunsmore, Coventry CV8 3EN

I can confirm that the College of Policing does hold some of the information you have requested. I will answer each of your questions individually below:

Please provide all source documentation that was used in producing the policy to support the assumption that an individual experiencing financial difficulties is a greater risk than an individual not experiencing financial difficulties of 'becoming vulnerable to financial inducement.'

Financial checks are just one of many factors that are considered by a Force Vetting Manager is assessing a person's suitability to be given a vetting clearance. Every person's circumstances are different and each person is considered on a case by case basis. The purpose of financial checks in vetting is clearly set out at 7.9.91 ' These checks are used to assess whether applicants have been, are currently, or are likely to be in financial difficulty, or show signs of financial irresponsibility to the extent that they could become vulnerable to financial inducement'. Vulnerability to financial inducement is a well understood risk as a result of experience in Counter Corruption investigations over many years.

In many cases the risk of financial issues can be risk managed by forces, and these risks may be considered to be less of a risk in comparison to non-financial risks identified in other cases.

Please further supply all source documentation that was used in producing the policy to support the assumption that individuals with a County Court Judgement (CCJ) are a greater risk than individuals experiencing financial difficulties without having a CCJ, or individuals with no financial difficulties with respect to 'becoming vulnerable to financial inducement.'

CCJ and bankruptcy are dealt with at 7.12.3 where it states applicants should not be considered in these cases where debts are outstanding or not discharged. The answer in relation to source documents is as per the above. Whilst vulnerability to financial inducement is a factor, in these cases the primary reason is the requirement to discharge lawful debt, and the failure to discharge debts in these cases which makes a person unsuitable for vetting clearance. The APP is clear that where debts have been discharged or are being so through IVA or DRO's that persons can be considered for vetting subject to the assessment of the risk.

If there is no evidence available to support these assumptions, please clearly state that the College of Policing have no evidence to demonstrate those in financial difficulties (with or without CCJ) are a greater risk to 'becoming vulnerable to financial inducement.'

As stated the evidence base for these risks is years of counter corruption investigations.

Please provide all evidence that demonstrates all information used when deciding upon section 7.9 Financial Checks when producing the APP Vetting May 2019 policy document.

Please clearly state if no evidence was taken into account when writing Section 7.9 -7.15 Financial Checks when producing the APP Vetting May 2019 policy document.

The answer to both points is it is largely from years of experience of counter corruption investigations as an objective evidence base. The first APP for vetting was written in 2014 and prior to that it was the ACPO National Vetting Policy and the College of Policing does believe the content around this subject has significantly changed since that time

Please provide the numbers of currently serving Police staff in England known to have financial difficulties, the number of currently serving Police staff to have CCJ(s), and the number of currently serving Police staff who are Bankrupt (discharged and undischarged). If these numbers are not known, please state that the numbers are unknown.

This information is held by Vetting Units in individual police forces and not by the College of Policing.

Please confirm that it is known within the Police Forces of England and the College of Policing that there are currently serving Police Officers, and Police staff who have active CCJ(s) and bankruptcy.”

This information is held by Vetting Units in individual police forces and not by the College of Policing.

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

Yours sincerely,

James Rose | 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

Appendix A Rights

If you are dissatisfied with the handling procedures or our decision made under the Freedom of Information Act 2000 (the Act) regarding access to information you have a right to request an internal review by the College of Policing.

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

The College of Policing will aim to respond to your request for internal review within **20 working days**.

The Information Commissioner

If, after lodging a review request you are still dissatisfied with the decision you may make an application to the Information Commissioner's Office (ICO) 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 you can write to the ICO:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF