

Our ref 1003474

Mr Philip Reynolds
By email
request-143172-3d0207d9@whatdotheyknow.com



10th January 2013

90 High Holborn
London WC1V 6BH

Tel: 020 7166 3000
Fax: 020 7404 0430
Minicom: 020 7404 0431
Email: enquiries@ipcc.gsi.gov.uk
Web: www.ipcc.gov.uk

Dear Mr Reynolds

FOI Request

Thank you for your email received at the IPCC on 22nd December 2012, regarding your request for information.

I note you have requested a current list of IPCC Investigators, Case workers and Supervisors and if they have an ex Police background.

I can confirm the IPCC holds the information that you have requested. I will disclose some of this information but I will not disclose all of the information. I will explain this further in my response.

The information that I am disclosing are the names and job titles of our Investigators and Caseworkers. We have omitted to include staff at junior levels that have no decision making powers or have limited contact with the public.

Further, there is one member of staff whose name has not been included on the list and this is because disclosure would be likely to endanger the health and safety of this individual.

The relevant part of section 38 of the FOI Act states:

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

(b) Endanger the safety of any individual

As section 38 is a qualified exemption I must still go on to consider whether the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

The Public Interest Test

I have taken into account the general public interest in openness, in the public being reassured and knowing the reasons behind the decisions, the general public interest in the accountability of the decision making process within public authorities and the public interest in individuals knowing the reason for decisions that may affect them.

I have also taken into account the duty public authorities such as the IPCC has an employer for the responsibility of their staff where there is a genuine risk to the health and safety of its staff. I therefore find that naming this individual cannot be justified and conclude that the public interest in maintaining this exemption outweighs the public interest in disclosure.

Disclosure of career background

I have decided that the IPCC is not obliged to release the information it holds regarding ex police background with the exception of Directors, Senior Investigators and Heads of Casework. This information is being withheld because it engages the exemption from the right to know contained in section 40 of the FOIA. My reasons for withholding this information in reference to section 40 are as follows.

FOIA section 40 - personal information

Section 40 of the Freedom of Information Act preserves the Data Protection Act restrictions on the disclosure of personal information. Information as to the career history of an individual who is identified by name falls within the definition of 'personal data', so that the Data Protection Act 1998 is engaged.

Section 40 sub-sections (2) and (3) of the Freedom of Information Act exempt personal information relating to persons other than the person making the request where disclosure of this personal information would contravene any of the data protection principles. In this case it is the first data protection principle that needs to be considered. This requires that the processing of personal data should be fair and lawful and that at least one of the conditions in Schedule 2 of the DPA must be met.

In considering whether or not complying with your request in full would be unfair on the individuals concerned and therefore contravene the requirements of the first principle, the IPCC has taken the following factors into account:

1. The individual's reasonable expectations of what would happen to their personal data
2. The seniority of the individual
3. Whether disclosure would cause any unnecessary or unjustified damage to the individual
4. The legitimate interests of the public in knowing the identity of the individual against the effects of disclosure of their name.

Consistent with guidance from the Information Commissioner, the IPCC accepts that public sector employees should expect some information about their roles and the decisions they take to be disclosed under the Act. A distinction can be drawn, however, between the types of information which junior staff should expect to have disclosed about them compared to what information senior staff should expect to have disclosed about them. This is because the more senior a member of staff is the more likely it is that they will be responsible for making significant policy decisions and/or decisions as to the expenditure of significant public funds.

For these reasons, the IPCC considers that individuals in the roles of Directors, Senior Investigators and Heads of Casework have a reasonable expectation that information about their career history would be disclosed where, as in regard to your request, this is directly relevant to issues of transparency and accountability and the

performance of their current duties. Conversely, a relatively junior member of staff with no outward facing role and more limited responsibilities would not reasonably expect details of his or her career history to be published. Decisions made in the context of police complaints and misconduct are often contentious and there is a lesser expectation that an individual in a lower grade should be able to withstand the type of personal criticism that would be more likely to follow if they are identified with an unwelcome decision and details of his or her career background are available to the public. It is the view of the IPCC that this risk to privacy cannot be justified in respect of persons it employs who occupy more junior positions.

It is also necessary to consider whether disclosure of the policing background of any staff other than Directors, Senior Investigators, Heads of Casework and junior employees can be brought within the first principle because such processing would be compliant with at least one of the conditions in Schedule 2 of the 1998 Act. As no staff members have not consented to disclosure, I find that your request must be refused insofar as it relates to these individuals *unless* Condition 6(1) can be met.

Under Condition 6(1) of Schedule 2, it is necessary to balance the legitimate public interest in disclosure against the interests of the individuals whose data it is.

There is a legitimate public interest in the disclosure of information that enables the public to decide for itself whether the IPCC is, as it claims, an independent organisation. For this reason, the IPCC accepts that the public has a right to know how many former or serving police officers and civilian staff are employed by the IPCC and in what positions. The IPCC does not accept, however, that there is a legitimate public interest in the disclosure of the identities of all these persons that would be sufficient to justify the degree of risk to their privacy that would be likely to result.

It is concluded that further disclosure is not necessary for the purposes of the legitimate interests of the IPCC or the persons to whom the information will be disclosed. I find that the public interest in disclosure is met by a combination of:

- Confirmation of the names of the IPCC Directors responsible for Investigations and Casework, Senior Investigators and Heads of Casework
- Confirmation of the number of serving and former police officers and civilian staff at IPCC and the positions they hold

In these circumstances, the disclosure of further names would not add value to the information already in the public domain and would not be reasonable and proportionate to the legitimate aim of informing the public about how the IPCC safeguards its independence. The reason why there is likely to be an adverse effect on more junior staff is explained above and it is concluded that the potential for such harm to the legitimate interests of all staff below the level of the senior staff named above would be unwarranted when there would be little or no legitimate purpose served by releasing their names.

Accordingly, it has been decided that further compliance with your request would contravene the Data Protection Act, thus engaging the exemption in section 40(2) and 40(3)(a)(i) of the Freedom of Information Act.

You may also refer to our Annual Report (page 131) on our website http://www.ipcc.gov.uk/Documents/annual_report_IPCC_2012_web.pdf which has information about the number of staff at IPCC and the proportion that have an ex police background.

If you are not satisfied with this response you may request an independent internal review by our FOI appeals officer, who has had no involvement in dealing with your request. If you wish to complain about any aspect of this decision, please contact:

Amanda Kelly
Director of Business Services
Independent Police Complaints Commission
90 High Holborn
London WC1V 6BH

All emails requesting a review should be sent **directly** to:
amanda.kelly@ipcc.gsi.gov.uk

Should you remain dissatisfied after this internal review, you will have a right of complaint to the Information Commissioner; however, I should point out that under section 50(2)(a) of the Freedom of Information Act, you are normally obliged to exhaust the IPCC's own internal complaint mechanism before complaining to the Information Commissioner

Yours sincerely



Colin Woodward
Head of Human Resources

Employee	Job Title	Division	ExPolice Officer YN
Moir Stewart	Director Of Investigations	Investigations	Y
Amanda Rowe	Senior Investigator	Investigations	N
Anzac Evans	Senior Investigator	Investigations	Y
John Cummins	Senior Investigator	Investigations	Y
Joseph Penrose	Senior Investigator	Investigations	Y
Michael Grant	Senior Investigator	Investigations	Y
Peter Orr	Senior Investigator	Investigations	Y
Simon Cousins	Senior Investigator	Investigations	Y
Stephen Reynolds	Senior Investigator	Investigations	Y
Adrian Tapp	Deputy Senior Investigator	Investigations	Exempt
Ally Hamilton	Deputy Senior Investigator	Investigations	Exempt
Andy Riley	Deputy Senior Investigator	Investigations	Exempt
Catherine Hall	Deputy Senior Investigator	Investigations	Exempt
Chris Mahaffey	Deputy Senior Investigator	Investigations	Exempt
Colin Dewar	Deputy Senior Investigator	Investigations	Exempt
Colin Sparrow	Deputy Senior Investigator	Investigations	Exempt
Corrina Kidd	Deputy Senior Investigator	Investigations	Exempt
Darren Quinlan	Deputy Senior Investigator	Investigations	Exempt
Georgia Wilson	Deputy Senior Investigator	Investigations	Exempt
Hannah Fernandez-Arias	Deputy Senior Investigator	Investigations	Exempt
Ian Tolan	Deputy Senior Investigator	Investigations	Exempt
Jay Howells	Deputy Senior Investigator	Investigations	Exempt
Mandy Bartholomew	Deputy Senior Investigator	Investigations	Exempt
Peter Moore	Deputy Senior Investigator	Investigations	Exempt
Richard Reynolds	Deputy Senior Investigator	Investigations	Exempt
Sally Peers	Deputy Senior Investigator	Investigations	Exempt
Sarah Patten	Deputy Senior Investigator	Investigations	Exempt
Tom Milsom	Deputy Senior Investigator	Investigations	Exempt
Stephen Bimson	Deputy Senior Investigator	Investigations	Exempt
Adam Stacey	Investigator	Investigations	Exempt
Adil Jamil	Investigator	Investigations	Exempt
Alan Carey	Investigator	Investigations	Exempt

Alan Wright	Investigator	Investigations	Exempt
Alex Hall	Investigator	Investigations	Exempt
Alexander Ives	Investigator	Investigations	Exempt
Amanda Trevett	Investigator	Investigations	Exempt
Amy Carr	Investigator	Investigations	Exempt
Andrea Stables	Investigator	Investigations	Exempt
Andrew Ryden	Investigator	Investigations	Exempt
Andrew Whiting	Investigator	Investigations	Exempt
Anna Proctor	Investigator	Investigations	Exempt
Berwyn Jones	Investigator	Investigations	Exempt
Brian Green	Investigator	Investigations	Exempt
Carol Dowling	Investigator	Investigations	Exempt
Catherine Bates	Investigator	Investigations	Exempt
Chris Lovatt	Investigator	Investigations	Exempt
Clara Harriott	Investigator	Investigations	Exempt
Colin Fisher	Investigator	Investigations	Exempt
Daniel Budge	Investigator	Investigations	Exempt
David Kirkpatrick	Investigator	Investigations	Exempt
David Yates	Investigator	Investigations	Exempt
Edmund Koerber	Investigator	Investigations	Exempt
Emily McMurrough	Investigator	Investigations	Exempt
Emma Kyne	Investigator	Investigations	Exempt
Emma Maloney	Investigator	Investigations	Exempt
Erik Waitt	Investigator	Investigations	Exempt
Farha Khan	Investigator	Investigations	Exempt
Gareth Jones	Investigator	Investigations	Exempt
Garry Jones	Investigator	Investigations	Exempt
Gary Liddler	Investigator	Investigations	Exempt
Geraldine Headon	Investigator	Investigations	Exempt
Harry Gamlin	Investigator	Investigations	Exempt
Heather Beck	Investigator	Investigations	Exempt
Helen Morgan	Investigator	Investigations	Exempt
Himalie Laxman	Investigator	Investigations	Exempt

Ivan West	Investigator	Investigations	Exempt
James Davies	Investigator	Investigations	Exempt
Janet Anderson	Investigator	Investigations	Exempt
Jayne Gardner	Investigator	Investigations	Exempt
Jennie Sugden	Investigator	Investigations	Exempt
Joanna Saunders	Investigator	Investigations	Exempt
Joanne Fitzgerald	Investigator	Investigations	Exempt
John Brennan	Investigator	Investigations	Exempt
Judith Lee	Investigator	Investigations	Exempt
Karen Roche	Investigator	Investigations	Exempt
Kathryn Matthews	Investigator	Investigations	Exempt
Keith Tagg	Investigator	Investigations	Exempt
Lindsay Harrison	Investigator	Investigations	Exempt
Mark Flavell	Investigator	Investigations	Exempt
Megan Campbell	Investigator	Investigations	Exempt
Melanie Palmer	Investigator	Investigations	Exempt
Miriam Davies	Investigator	Investigations	Exempt
Natalie Michael	Investigator	Investigations	Exempt
Natalie Musto	Investigator	Investigations	Exempt
Neil Buchanan	Investigator	Investigations	Exempt
Nicki Williams	Investigator	Investigations	Exempt
Nicola Heley	Investigator	Investigations	Exempt
Paul Williams	Investigator	Investigations	Exempt
Rachel Cocker	Investigator	Investigations	Exempt
Rebecca Hinton	Investigator	Investigations	Exempt
Richard Hedley	Investigator	Investigations	Exempt
Richard Omotosho	Investigator	Investigations	Exempt
Russ McDermott	Investigator	Investigations	Exempt
Sarah Fish	Investigator	Investigations	Exempt
Shaun Coleman	Investigator	Investigations	Exempt
Simon Fuller	Investigator	Investigations	Exempt
Simone Thompson	Investigator	Investigations	Exempt
Siobhan Brennan	Investigator	Investigations	Exempt

Stephen Bimson
Stephen Day
Stephen Liston
Suzanne Moore

Investigator
Investigator
Investigator
Investigator

Investigations
Investigations
Investigations
Investigations

Exempt
Exempt
Exempt
Exempt

Employee	Job Title	Division	ExPolice Officer YN
David Knight	Director Of Casework And Customer Services	Casework & Customer Services	N
David Ford	Head Of Casework	Casework & Customer Services	N
JohnPaul Napier	Head Of Casework	Casework & Customer Services	N
Brenda Lewis	Senior Casework Manager	Casework & Customer Services	Exempt
Christina Davies	Senior Casework Manager	Casework & Customer Services	Exempt
Christine Richards	Senior Casework Manager	Casework & Customer Services	Exempt
Christopher McCoy	Senior Casework Manager	Casework & Customer Services	Exempt
Claire Slade	Senior Casework Manager	Casework & Customer Services	Exempt
Clare Hogan	Senior Casework Manager	Casework & Customer Services	Exempt
Hannah Bunker	Senior Casework Manager	Casework & Customer Services	Exempt
Jonathan Francis	Senior Casework Manager	Casework & Customer Services	Exempt
Marie Lydon	Senior Casework Manager	Casework & Customer Services	Exempt
Melanie Ford	Senior Casework Manager	Casework & Customer Services	Exempt
Natalie Heptonstall	Senior Casework Manager	Casework & Customer Services	Exempt
Neil Rushmere	Senior Casework Manager	Casework & Customer Services	Exempt
Peter Crouch	Senior Casework Manager	Casework & Customer Services	Exempt
Rebecca Reed	Senior Casework Manager	Casework & Customer Services	Exempt
Sian Budge	Senior Casework Manager	Casework & Customer Services	Exempt
Simon Timms	Senior Casework Manager	Casework & Customer Services	Exempt
Sunny Bhalla	Senior Casework Manager	Casework & Customer Services	Exempt
Jemma Missen	C C C: Deputy Senior Casework Manager	Casework & Customer Services	Exempt
Laura Bailey	C C C: Deputy Senior Casework Manager	Casework & Customer Services	Exempt
Claire Hall	Deputy Senior Casework Manager	Casework & Customer Services	Exempt
Alice Mabbett	Casework Manager	Casework & Customer Services	Exempt
Alison Latham	Casework Manager	Casework & Customer Services	Exempt
Alison Thomas	Casework Manager	Casework & Customer Services	Exempt
Amy Cridge	Casework Manager	Casework & Customer Services	Exempt
Andrew Cunningham	Casework Manager	Casework & Customer Services	Exempt
Andrew Getty	Casework Manager	Casework & Customer Services	Exempt
Andrew Larkin	Casework Manager	Casework & Customer Services	Exempt
Andrew Thomas	Casework Manager	Casework & Customer Services	Exempt
Angela Goddard	Casework Manager	Casework & Customer Services	Exempt

Angela Job	Casework Manager	Casework & Customer Services	Exempt
Anthony Coulson	Casework Manager	Casework & Customer Services	Exempt
Arlene Daniel	Casework Manager	Casework & Customer Services	Exempt
Astrid Nason	Casework Manager	Casework & Customer Services	Exempt
Ayaz Hassan	Casework Manager	Casework & Customer Services	Exempt
Carol Staff	Casework Manager	Casework & Customer Services	Exempt
Casey Griffiths	Casework Manager	Casework & Customer Services	Exempt
Catherine Cooper	Casework Manager	Casework & Customer Services	Exempt
Charles Robson	Casework Manager	Casework & Customer Services	Exempt
Chris Shiels	Casework Manager	Casework & Customer Services	Exempt
Christalla Power	Casework Manager	Casework & Customer Services	Exempt
Christina Davies	Casework Manager	Casework & Customer Services	Exempt
Claire Parsons	Casework Manager	Casework & Customer Services	Exempt
Claire Swain	Casework Manager	Casework & Customer Services	Exempt
David Turner	Casework Manager	Casework & Customer Services	Exempt
Dionne Layne	Casework Manager	Casework & Customer Services	Exempt
Elizabeth Pollard	Casework Manager	Casework & Customer Services	Exempt
Emily-Jane Dorr	Casework Manager	Casework & Customer Services	Exempt
Emma Pearce	Casework Manager	Casework & Customer Services	Exempt
Esmeralda Wong	Casework Manager	Casework & Customer Services	Exempt
Gail Mead	Casework Manager	Casework & Customer Services	Exempt
Graeme Thame	Casework Manager	Casework & Customer Services	Exempt
Hannah Skelton	Casework Manager	Casework & Customer Services	Exempt
Hayley Gogarty	Casework Manager	Casework & Customer Services	Exempt
Helen Alderson	Casework Manager	Casework & Customer Services	Exempt
Helen Ellul	Casework Manager	Casework & Customer Services	Exempt
Ian Downey	Casework Manager	Casework & Customer Services	Exempt
Ian Drew	Casework Manager	Casework & Customer Services	Exempt
Jack Harvey	Casework Manager	Casework & Customer Services	Exempt
James Abraham	Casework Manager	Casework & Customer Services	Exempt
Jamie Wood	Casework Manager	Casework & Customer Services	Exempt
Jane Carruthers	Casework Manager	Casework & Customer Services	Exempt
Jane Crane	Casework Manager	Casework & Customer Services	Exempt

Jane Spencer	Casework Manager	Casework & Customer Services	Exempt
Jennifer Gillan	Casework Manager	Casework & Customer Services	Exempt
Joe Hibbert	Casework Manager	Casework & Customer Services	Exempt
John Campbell Ricketts	Casework Manager	Casework & Customer Services	Exempt
Jonathan Francis	Casework Manager	Casework & Customer Services	Exempt
Joseph Mulligan	Casework Manager	Casework & Customer Services	Exempt
Kathryn Lawcock	Casework Manager	Casework & Customer Services	Exempt
Kieran Coleman	Casework Manager	Casework & Customer Services	Exempt
Laura Bailey	Casework Manager	Casework & Customer Services	Exempt
Laura Hooper	Casework Manager	Casework & Customer Services	Exempt
Linda Chapman	Casework Manager	Casework & Customer Services	Exempt
Lisa Parrin-Lester	Casework Manager	Casework & Customer Services	Exempt
Louise Bell	Casework Manager	Casework & Customer Services	Exempt
Louise Waithaka	Casework Manager	Casework & Customer Services	Exempt
Mandy O'Hagan-Perry	Casework Manager	Casework & Customer Services	Exempt
Marianne Rossi	Casework Manager	Casework & Customer Services	Exempt
Michael Barrett	Casework Manager	Casework & Customer Services	Exempt
Michael Gibbs	Casework Manager	Casework & Customer Services	Exempt
Michael Meehan	Casework Manager	Casework & Customer Services	Exempt
Michelle Bennett	Casework Manager	Casework & Customer Services	Exempt
Michelle Ellington	Casework Manager	Casework & Customer Services	Exempt
Mumta Patel	Casework Manager	Casework & Customer Services	Exempt
Nadir Miheisi	Casework Manager	Casework & Customer Services	Exempt
Neil Jasper	Casework Manager	Casework & Customer Services	Exempt
Nischal Thakkar-Cunningham	Casework Manager	Casework & Customer Services	Exempt
Oliver Carr	Casework Manager	Casework & Customer Services	Exempt
Patricia Napier	Casework Manager	Casework & Customer Services	Exempt
Paula McEwan	Casework Manager	Casework & Customer Services	Exempt
Peter Hunt	Casework Manager	Casework & Customer Services	Exempt
Rachel Berios	Casework Manager	Casework & Customer Services	Exempt
Rajbir Rai	Casework Manager	Casework & Customer Services	Exempt
Rebecca Le Gall	Casework Manager	Casework & Customer Services	Exempt
Rebecca Thompson	Casework Manager	Casework & Customer Services	Exempt

Rebecca Tonge	Casework & Customer Services	Exempt
Rhys Morton	Casework & Customer Services	Exempt
Rob Sparrow	Casework & Customer Services	Exempt
Samantha Heath	Casework & Customer Services	Exempt
Sandie Clarke	Casework & Customer Services	Exempt
Sarah Turner	Casework & Customer Services	Exempt
Shardesh Ramchurn	Casework & Customer Services	Exempt
Shireece Webster	Casework & Customer Services	Exempt
Siân Budge	Casework & Customer Services	Exempt
Simon Timms	Casework & Customer Services	Exempt
Sophie Shipman	Casework & Customer Services	Exempt
Stacey Daly	Casework & Customer Services	Exempt
Steven Ireland	Casework & Customer Services	Exempt
Steven Smith	Casework & Customer Services	Exempt
Susan Badham	Casework & Customer Services	Exempt
Tim Edwards	Casework & Customer Services	Exempt
Tina Vaughan	Casework & Customer Services	Exempt
Vanessa Mensah	Casework & Customer Services	Exempt
Vyvian Nugent	Casework & Customer Services	Exempt