



West
Yorkshire
Combined
Authority

Tracy
Brabin
Mayor of
West Yorkshire

Our Reference: 3219

29/05/2026

Freedom of Information Request – Internal Review

Thank you for your email, which was received by the West Yorkshire Combined Authority on 5 April 2026, requesting an internal review of your Freedom of Information request.

You requested:

“ My understanding of your response is that;

- (a) Every Casework & Reviews Officer and Manager has attended such training, but you can not tell me when they did.*
- (b) There is no specific and/or mandatory training programme that needs to be adhered to.*
- (c) SG2020 requires sufficient training for anyone handling review requests of police complaints.*
- (d) I am apparently already aware that the Casework and Reviews Manager and Casework Officer, who were in post before the responsibility for Reviews commenced on 1 February 2020, both attended Reviews training in 2019 which was jointly delivered by the IOPC and the Home Office.*
- (e) Your casework team in March 2023 comprised 1 Casework Manager and 2 Casework Officers, and all three had received training.*
- (f) WYCA does not hold a specific record of the training that the team has undertaken.*
- (g) Training is recorded only in personnel files and is thus unavailable under FOIA 40(2).*

My replies to which are;

- (1) The information you have provided is not the information I requested. (I asked for details of what relevant training your Casework Officers had received, not for details of its recipients or its providers (unless these are also necessary to validate the training’s suitability).)*



West
Yorkshire
Combined
Authority

Tracy
Brabin
Mayor of
West Yorkshire

(2) I specifically asked for details of training received before March 2023, yet you have grouped training before and after March 2023 in your response on this point, thus rendering your response of no use.

(3) I have no knowledge of item (d), and my FOIR gave no indication that I have. Can you therefore please tell me why you have made this false statement?

(4) The argument that proof of publicly-funded training can be withheld under FOIA exemption 40(2) is illogical, because such information is not the data subject's personal data. (I trust you are not confusing the words personnel and personal?)

Because the public purse presumably paid for them, the training provided by the IOPC and/or the Home Office, and the physical proof of that provision, both belong to WYCA. Exemption 40(2) could therefore only apply if the training and its documentary proof had been paid for by the data subject themselves (i.e. that it is the caseworkers' private property) and you have made it clear that it is not.

(5) There is in any case no logical reason why non-personal data (especially that necessary to prove to the public that an employee is fit for their role) can not be extracted from personnel files and provided under a neutral heading, e.g. 'WYCA Casework Officer review training provided up to and including Mar 2023'.

(6) The FOIA duty to confirm or deny does not apply if the circumstances exist for an exemption under 40(2), yet you have confirmed that the information I have requested does exist (in personnel files). I must conclude from this that those details can be

extracted from those personnel files, otherwise you wouldn't have mentioned their existence.

(7) If WYCA can not prove to the public that an employee designated to handle reviews is suitably trained to do so, that employee should not be tasked with carrying out reviews – yet your three casework team members presumably do carry out reviews.

Furthermore, if WYCA can not provide to the public a record of specific employee training, there is no proof that it has provided the public with the requisite public function of reviewing police complaint handling, or that it has spent on that provision the public funds made available to it for that provision.



West
Yorkshire
Combined
Authority

Tracy
Brabin
Mayor of
West Yorkshire

Logically, WYCA should therefore never have made personnel files the sole repositories for proof of WYCA's caseworker training – and should not now be arguing that the FOIA prevents that proof from being made known to the UK public.

FOIR 2 (The difference between Casework Officers and Casework and Review Officers)

My understanding of your response is that;

- (a) The role 'Casework Officer' was replaced by the role 'Casework and Review Officer' at some undisclosed time in 2023.*
- (b) You claim to have sent me two 'role profile' documents – one purporting to be the 'Casework Officer Role Profile 2020', and another purporting to be the 'Casework and Review Officer Role Profile 2023'.*
- (c) You have stated that you "do not hold further details regarding the differences in training and police complaint handling between the two job profiles".*

My replies to which are;

- (1) Both documents are for the same position – that of 'Casework Officer' – and the differences between those documents therefore do not provide or even represent the information I requested.*
- (2) The word 'further' in item (c) suggests that each document already identifies some details of the training and police complaint handling involved in the role it covers – yet neither document does. (There is no mention of the training that will be required to be undertaken by successful applicants for these roles.)*

To summarise, it is clear that no diligent attempt has been made to fulfil my FOI request, and furthermore, it appears that the training information that I have requested (and which you claim exists) does not exist. I therefore request an internal review of your response."



West
Yorkshire
Combined
Authority

Tracy
Brabin
Mayor of
West Yorkshire

In accordance with the Combined Authority's internal review procedure, this matter has been reviewed by the Assistant Director, People & Transformation and the Data Protection Officer.

The reviewer has:

- Considered all of the correspondence;
- Discussed with the authors of the initial response to you the reasons for the response, together with their views on your request for a review; and
- Considered the legislation and relevant ICO guidance

The independent review noted the application of Section 40 (2) was applied for information you requested for *details of the relevant training your Casework Officers had to have received before being tasked with handling police complaint reviews from March 2023 onwards*.

You then clarified above that the request for information is for '*...details of training received before March 2023*'

Upon review it is determined that details of the training received by our casework officers before March 2023 for which we hold information can be disclosed under the Act as follows:

- Foundation Course in LPB Review Handling Skills delivered by Delivering With Difference, early March 2023. This has been supplemented with CPD in OPCC Regional Complaint Handling and Reviews workshop, delivered by Sancus Solutions, in the same year
- OPCC Workshop and Training events- Complaints, Reviews and Oversight – delivered by Sancus, December 2022
- Reviews Practitioner Workshop, IOPC, Aug – Sept 2020, Nov 2021.
- Reform Act Training for Appropriate Authority roles, delivered by Sancus, Sept 2019

In the previous response letter to your FOI, we explained that every Casework & Reviews Officer and Manager has attended individual training- this is confirmed as information published on the following page: [Policing and Crime transparency](#) under 'Assessment of our own performance in carrying out other complaints handling functions'. While the above covers information held by the Combined Authority in relation to your request, our



West
Yorkshire
Combined
Authority

Tracy
Brabin
Mayor of
West Yorkshire

casework officers have participated in continued professional development and learning within this field, however the Combined Authority does not hold information on the details of this. This may be due to multiple reasons including that the information deleted under retention policies, or simply not in a recorded format.

The IOPC's statutory guidance on the police complaints system, stipulates that ***18.12 Local policing bodies must ensure that anyone considering applications for reviews has sufficient training.***", and does not specify a mandatory training programme that needs to be adhered to.

On (3) above, I can confirm the Combined Authority treats all freedom of information requests as applicant-blind. If you may be dissatisfied with the way the Combined Authority has handled your request, you have the right to raise a complaint by contacting customerfeedback@westyorks-ca.gov.uk

On your internal review request for *FOIR 2 (The difference between Casework Officers and Casework and Review Officers)*, the information supplied in response to FOI 3219 explained the role profile change from Casework Officer to Casework and Reviews Officer in 2023, along with the information held (the two role profiles, dated 2020 and 2023) showing the difference between Casework Officers and Casework and Review Officers. To provide some context to the main differences, this was an evolution of the role from 2020 to 2023, Further to this, the Office of the Police and Crime Commissioner (OPCC) transferred to the Combined Authority in 2021, after which the organisation undertook an organisation design. This included a review of role profiles with a view to ensuring terms and conditions were harmonised across the organisation after the transfer of the OPCC, which would explain any differences in the two profiles.

If you are not content with the outcome of this internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113/01625 545745

Website: www.ico.gov.uk



West
Yorkshire
Combined
Authority

Tracy
Brabin
Mayor of
West Yorkshire

For your information, there is no charge for making an appeal.

Yours sincerely,

Information Governance Officer

freedom.info@westyorks-ca.gov.uk