



FREEDOM OF INFORMATION REQUEST



Request Number: F-2018-01418

Keyword: Human Resources

Subject: Corporate Communications Interviews

Request and Answer:

You submitted two pieces of correspondence to PSNI on the 13th June 2018 which contained requests under both Freedom of Information and the subject access requests under the General Data Protection Regulation ('GDPR'). For ease of reference this response deals with those requests which triggered the 'Freedom of Information Act 2000' (FOIA). Your request for your own personal data in relation to notes made by the panel during your interview will be dealt with under a Subject Access Request under Data Protection legislation and you will be responded to under Subject Access Request reference number DPA -2018 -01434. You will be contacted separately about this.

In terms of those requests under the FOIA which this response addresses, under section 1(1) (a) of that Act I can confirm that the Police Service of Northern Ireland does hold information to which your requests relate. The decision has been taken to supply you with information in relation to Request 1, 2, 5 and 6 below subject to minor redactions of PSNI third party staff names. Please note we have extracted the FOIA requests you have made from both of your pieces of correspondence so our numbering of requests made to us below, does not match those submitted by you. We are not supplying you with information in relation to requests 3, 4 and 7 as these we consider are exempt under section 40 (2) of the FOIA. Our rationale as to why this exemption applies is detailed below. We have also provided you with links to guidance issued by the Information Commissioner's Office which we have followed in responding to your request.

You made the following FOIA requests:

Request 1

Under the Freedom of Information Act please provide me with the following information in respect of your recently advertised Corporate Communications Officer and Senior Press Officer positions:

The key points, or model answer, that panel members agreed they were looking for from applicants for the presentation component.

Request 2

The key points, or model answer, that panel members agreed that they were looking for in respect of each question asked at interview.

Request 3

Anonymised interview notes for each of the other candidates interviewed for both the Corporate Communications Officer and Senior Press Officer positions. The personal data of the other

candidates can be redacted to protect them.

Request 4

For both the Corporate Communications Officer and Senior Press Officer jobs please supply anonymised copies of the interview notes and summary sheet for each candidate invited to interview with their personal data removed or redacted to comply with the Data Protection Act for these applicants.

Request 5

Copy of all documentation on how the PSNI scores interviews for jobs advertised. Please include in this the scoring framework for both the presentation element and interview questions.

Request 6

The total number of people who applied for both the Corporate Communications Officer and Senior Press Officer jobs and the number of people interviewed for both jobs.

Request 7

Was the successful candidate for both the positions above already employed by the PSNI?

Answer (1, 2, 5 and 6)

In response to Request 1, 2 and 5 above, Human Resources have advised that the Assessor Guidance document illustrates how candidate responses are assessed and scored. We are supplying this to you. This is briefed to all Interview/Presentation Panel assessors by an HR representative before the first Interview/Presentation takes place. A copy of the document is also included in each panel member's competition file for reference purposes.

The Job Descriptions document lists the competency behavioural areas for the Senior Press Officer and Corporate Communications Officer roles (pages 8 & 9 illustrate the behavioural competencies associated with this role) which we are also supplying to you. It is the evidence of the competency within the response provided which translates into the award marking. The Presentation topic and Interview questions are selected from these behavioural areas during the planning stages of the recruitment process. They are selected by a subject matter expert from that area of business as being the most appropriate.

The scoring sheets illustrate how the panel will assess the evidence presented during the presentation and interview phase. Please note that for all Police Service of Northern Ireland external recruitment competitions, to pass the assessment, a minimum score of 4 is required for each competency area being tested.

Please see the Assessor Guidance, Job Descriptions, Interview questions and Scoring Guidelines documents attached separately to this correspondence. **Please note:** *names of PSNI staff have been redacted from the documents subject to Section 40 as this constitutes the personal data of these individuals; the rationale is explained further in the response below.*

In response to Request 6, i.e. the total number of people who applied for both the Corporate Communications Officer and Senior Press Officer jobs and the number of people interviewed for both jobs please see the table below:

	Senior Press Officer	Corporate Communications Officer
Total number of applications	26	41
Total number invited to interview	22	26

Answer (Request number 3, 4 & 7 - minor redactions of staff details from the above released documents)

PSNI are not supplying this information to you as we consider it attracts an exemption under the FOIA. Section 17(1) of the Freedom of Information Act 2000 requires the Police Service of Northern Ireland, when refusing to provide such information (because the information is exempt) to provide you the applicant with a notice which:

- (a) states that fact,
- (b) specifies the exemption in question and
- (c) states (if not otherwise apparent) why the exemption applies.

The exemption, as well as the factors PSNI considered are listed below:

Section 40(2)(a)(b) by virtue of 40(3)(A)(a) Personal Information – Information constitutes personal data and disclosure would contravene any of the Data Protection principles.

We have explained below in our response why this exemption is engaged and the full text of exemptions can be found at www.legislation.gov.uk. Further guidance on how they operate can be located on the Information Commissioners Office website www.ico.org.uk.

Section 40 (2) of the FOIA is an absolute exemption which means there is no requirement on the PSNI to consider whether there is a public interest in disclosure. It is an interface exemption and we must consider whether release of the information would breach the General Data Protection Regulations ('GDPR') or the Data Protection Act 2018 ('DPA') Third party personal information in relation to candidates, constitutes their 'personal data' under the GDPR (Article 4) and DPA (Part 1 s.3).

Under the FOIA, PSNI must consider if information can be released into the public domain which would not infringe Data Protection legislation. Given the small number of appointments, the nature of the role and interactions with other areas of the media, release of information could contribute to the identification of individuals, and PSNI staff. This information we consider amounts to their 'personal data'. We considered therefore whether release of this personal data would contravene any of the six data protection principles contained within the GDPR or DPA.

The six data protection principles are good information handling standards which PSNI must comply with in relation to how it handles personal information, including deciding whether to disclose it or not. In particular, the first principle requires personal data to be processed 'fairly and lawfully'. In considering whether it is 'fair' to any individual to release information about them, PSNI considered the likely expectations of those individuals and the nature of the information involved. Individuals must have confidence that their information is treated sensitively and appropriately by PSNI. We consider those individuals would not have any reasonable expectation PSNI would disclose such information of this nature about them. We further consider it would not be possible to anonymise information sufficiently in terms of information candidates provided at interview and examples given of their work which could identify them. It would also not be in the reasonable expectations of those candidates who went for these roles, for PSNI to provide details of their background employments into the public domain. We consider it would be unfair to those individuals and therefore a breach of the first principle of data protection legislation. This information is therefore exempt under section 40 (2) of the FOIA as it contravenes data protection legislation to release it and the PSNI has made the decision to withhold that information.

If you have any queries regarding your request or the decision please do not hesitate to contact me

on 028 9070 0164. When contacting the Freedom of Information Team, please quote the reference number listed at the beginning of this letter.

If you are dissatisfied in any way with the handling of your request, you have the right to request a review. You should do this as soon as possible or in any case within two months of the date of issue of this letter. In the event that you require a review to be undertaken, you can do so by writing to the Head of Freedom of Information, PSNI Headquarters, 65 Knock Road, Belfast, BT5 6LE or by emailing foi@psni.pnn.police.uk.

If following an internal review, carried out by an independent decision maker, you were to remain dissatisfied in any way with the handling of the request you may make a complaint, under Section 50 of the Freedom of Information Act, to the Information Commissioner's Office and ask that they investigate whether the PSNI has complied with the terms of the Freedom of Information Act. You can write to the Information Commissioner at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. In most circumstances the Information Commissioner will not investigate a complaint unless an internal review procedure has been carried out, however the Commissioner has the option to investigate the matter at his discretion.

Please be advised that PSNI replies under Freedom of Information may be released into the public domain via our website @ www.psni.police.uk

Personal details in respect of your request have, where applicable, been removed to protect confidentiality.