

## Exclusion and redaction policy

The council will exclude from (omit) or redact (anonymise by deleting personal details) information concerning particular payments under a limited range of circumstance, in accordance with legal requirements and good practice. The circumstances in which this will apply are set out below.

No.	Examples of transactions that may be excluded from publication	Reason	Redacted or excluded
1	Salary payments to staff (including bonuses), except when published under the senior salary scheme. These will be published separately.	Personal information protected by the Data Protection Act.	excluded
2	Pension contributions (excluding service charge) and National Insurance Contributions.	Personal information protected by the Data Protection Act	excluded
3	Severance payments.	Personal information protected by the Data Protection Act	excluded
4	Payments to individuals from legal process - compensation payments, legal settlements, fraud payments.	Personal information protected by the Data Protection Act	redacted
5	Competition prizes – where a normal part of operations.	Personal information protected by the Data Protection Act	redacted
6	Settlements made with companies as an arbitration which is conditional on confidentiality.	Commercial-in-confidence exempt under the Freedom of Information Act	redacted
7	Potential betrayal of a commercial confidence, or prejudice to a legitimate commercial interest.	Only where justified	redacted
8	Transactions relating to the financing or underwriting of debt eg purchase of credit default swaps.	Outside the definition of expenditure for this purpose	excluded
9	Provisions or promises to pay not yet realised.	Not yet realised	excluded

In addition, payments will be excluded or redacted (and responses to any enquiries will be constrained) where other statutory provisions apply, eg:

### Exemptions in the Freedom of Information Act

Absolute exemptions:

- Information supplied by or relating to bodies dealing with security matters (s23).
- Court records (s32).
- Parliamentary privilege (s34).
- Prejudicial to effective conduct of public affairs (only information held by House of Commons or House of Lords) (s36).
- Personal Information (where the applicant is the subject of the information or where the

- information concerns a third party and disclosure would breach one of the data protection principles) (s40).
- Actionable breaches of confidence (s41).
- Where disclosure would breach another enactment or would constitute a contempt of court (s44).

Qualified exemptions:

- Information held with a view to publication at a future date (s22).
  - National security (s24).
  - Defence (s26).
  - International relations (s27).
  - UK administrations relations (s28).
  - UK economic interests (s29).
  - Investigation of offences and criminal matters (s30).
  - Law enforcement (s31).
  - Audit functions (s33).
  - Formulation of government policy, ministerial communications (s35).
  - Prejudicial to effective conduct of public affairs (except information held by House of Commons/House of Lords) (s36).
  - Communications with the Queen, the Royal Family or concerning honours (s37)
  - Health and safety (s38).
  - Environmental Information (s39).
  - Personal Information (personal information about a third party the release of which would not be in breach of the Data Protection Act) (s40).
  - Legal professional privilege (s42).
  - Commercial interests (s43).
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