



## **Request**

I am making a request under Freedom of Information to understand the contracted hours of all staff on grades 10 to 16 inclusive, broken down per the following categories:

Directorate  
Section  
Job Title  
Grade  
Hours per week  
Flexible Retirement Y/N

## **Response**

While the Council recognises the importance of transparency, we must also ensure that individuals' privacy is protected. In some cases, the numbers of employees falling within some categories is very low. Disclosing such granular information could lead to the identification of individual employees, either directly or indirectly e.g. when combined with other publicly available data.

Section 40 (2) of the Freedom of Information Act 2000 provides an exemption if the information requested constitutes personal data and if one of three conditions is satisfied.

Job title and flexible retirement status is personal data.

The first condition under section 40(3A)(a) is satisfied if disclosure would breach any of the Data Protection Principles in UK General Data Protection Regulation

(GDPR). The first data protection principle is that personal data processing must be lawful. The only possible lawful bases for disclosure under the Freedom of Information Act 2000 would be consent or legitimate interests. The Council does not have individual employees consent to disclose this information. The Council has no legitimate interest in disclosing this information when employees would not expect it, any third party's legitimate interests in the receipt of such information would be outweighed by the data protection and privacy rights of the employees.

Therefore, the Council confirms that it has withheld section, job title and flexible retirement status using the exemption available at section 40 (3A) (a) of the Freedom of Information Act 2000.