



Your reference:

Our reference: FOI_25_0407

E-mail: FOI

@gloucestershire.police.uk

Direct dial: 01452 754304

Postal Address: As above

Date: 13/05/2025

Dear

Gloucestershire Constabulary Freedom of Information request 2025_0407

On 10/04/2025 you sent an email constituting a request under the Freedom of Information Act asking the following:

For the period 1 April 2024 to 31 March 2025:

1. How many Non-Disclosure Agreements (NDAs), also referred to as confidentiality clauses were signed with staff (current or former) by your organisation?

Of those NDAs, how many were part of settlement agreements related to:

- a) Complaints of bullying or harassment
- b) Complaints of discrimination (on any protected characteristic)
- c) Whistleblowing
- d) Other reasons (please specify if possible)

2. What was the total amount of money paid out in settlement agreements that contained NDAs?

What is the highest individual settlement amount paid in this period as part of a settlement agreement that contained an NDA?

Please include any available breakdowns by department, staff role, or type of claim where possible.

Under the Freedom of Information Act 2000 s1, I can confirm that Gloucestershire Constabulary holds some relevant information.

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2 The total amount paid, including legal fees was £373,981.95

To breakdown the information further by the highest amount paid, department or staff role could identify the individual therefore this is exempt by section 40.

Section 17 of the Freedom of Information Act 2000 requires Gloucestershire Constabulary, when refusing to provide information (because the information is exempt) to provide you the applicant with a notice which: (a) states the fact, (b) specifies the exemption in question and (c) states (if not otherwise apparent) why the exemption applies.

With regard to the disclosure of the reasons for the NDA and personal details relating to the recipient, the following exemption applies:

Section 40(2) Personal Information

Section 40(2) applies to third party personal data. This would not be released under the Freedom of Information Act unless there is a strong public interest. The disclosure of any information which could lead to the identification of an individual would breach the Data Protection Principles contained with the Data Protection Act 2018, namely the first principle which states that personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals

This exemption is absolute and class based therefore I am not required to apply either the public interest test or harm test in disclosure.

In accordance with the Act, this letter represents a Refusal Notice for this part of your request.

If you are not satisfied with this response or any actions taken in dealing with your request, you have the right to ask that we review your case under our internal procedure. Please note that a request for an internal review must be made within 20 working days of the response to your original request.

If you decide to request that such a review is undertaken and following this process you are still unsatisfied, you then have the right to direct your complaint to the Information Commissioner for consideration.

The Information Commissioner can be contacted via the following means:

Website - <https://ico.org.uk/>

Call their helpline - 0303 123 1113

Email - casework@ico.org.uk

Post –

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire

SK9 5AF

Yours sincerely,

Disclosure Officer
Gloucestershire Constabulary