

Transparency policy

Payments over £500

November 2013

Transparency policy

Why is some information excluded?

The Council does not publish information on payments to individuals, or to its staff, or to its pensioners, in order to either protect their privacy or to protect vulnerable people. Payment details exclude;-

- salaries and pensions
- housing benefit payments
- council tax or business rate refunds
- sensitive social care services information which could put vulnerable individuals at risk

However individuals who have a commercial relationship, i.e. receive payments as a result of an invoice, with the Council (Sole Traders) will have their payments details published.

Details of Councillors and their allowances and of senior staff and their remuneration are excluded as they are already covered by statutory publication schemes and are published annually;-

1. Details of allowances paid to Councillors can be found at;- <http://www.croydon.gov.uk/democracy/elected/generalinfo/membersallowances>
2. Details of the Corporate Management Team's remuneration are contained in the Council's Accounts, which can be found at;- <http://www.croydon.gov.uk/democracy/budgets/finaccts>

Why is some information redacted from the records?

The council is under a legal duty of care not to reveal certain details. Information that is redacted includes;-

- Personal details or any payments which may reveal personal details about an individual. i.e. details that may identify individuals, include;-
 - the names and/or addresses of individuals receiving payments for providing supplies or services
 - payments to people who receive direct payments for social care,
 - payments to people who provide care services e.g. foster parents (payments to organisations providing care services are not redacted).
 - invoices identifying any individual who is receiving a service e.g. social care clients or children in care.
- Information that has been provided to us in confidence
- Information that is commercially confidential

In these cases we provide as much information as we can, and remove or redact the minimum amount necessary. The examples of this are relatively limited compared to the amount of information we do publish.

Croydon's Redaction Process

A report containing all the previous month's creditor payments is produced by the Oracle Team around the 5th of the month.

Excluded - a number of interfaced payments;-

- council tax refunds,
- business rate refunds,
- social care payments,
- schools advances,
- payments to voluntary organisations,
- salary cheque payments

Also excluded;-

- payments to suppliers with a classification of individuals,
- employees,
- petty cash,
- refunds
- grants and donations

These exclusions were agreed by the Director of Finance.

The transactions listing is reduced by omitting items <£500

Visual search is made of the resulting transaction schedule in the "Supplier's Name" column and the "Invoice Number" column.

Where the payee's name is identified as an individual (or there is some doubt) then the name is Googled. Should the individual, for example;-

- have a LinkedIn reference
- is a member of chambers or
- provides consultancy or advisory services

then it is assumed that the transaction is of a commercial nature.

Reference is also made to both the Code and the Department against which the transaction is charged. For example if the department is identified as "Capital" then it is assumed that the transaction is of a commercial nature.

Suppliers identified as individuals are highlighted and the transaction listing is then circulated to Departmental Heads of Finance for review and amendment. The Listing is then forwarded for publication around 15th of the month.

If a request for further information is received after publication it is treated as a FoI (freedom of information) request and dealt with by the accountancy team responsible for the service against which the invoice is charged. It is at this stage that further redaction may be necessary if the requested invoice contains personal information.