



Our ref: Internal Review of FOI 26/27

18th June 2026

Dear [REDACTED]

Thank you for your request for an internal review of our response dated 26th May 2026 (reference FOI 26/27). I have now completed that review.

I will address each of your points below.

1. Application of Section 40(2)

Following review, we acknowledge that Section 40(2) was applied too broadly in our original response.

While individual settlement agreements do constitute personal data, we accept that aggregated data, where appropriately anonymised, does not in itself identify individuals. We also recognise the aggregation approach you proposed as a valid means of reducing identification risk.

We have therefore revisited the request and can now provide the following aggregated information:

- 2021–2024: 3 agreements, totaling £79,775
- 2024–2026: 4 agreements, totaling £133,662.26

In respect of periods prior to 2017, The Royal Parks was incorporated as a charity in 2017 and we do not hold relevant information in scope of this request before that date.

2. Policy / Guidance (Question 3)

We accept that institutional policy information does not constitute personal data and should have been addressed separately in our original response.

The Royal Parks does not have a standalone policy specifically governing the use of settlement agreements or non-disclosure clauses. However, relevant governance is set out in the Terms of Reference for the HR Committee, which include:



- Approval of the overall budget for redundancy packages linked to corporate reorganisations or restructuring involving more than three roles at risk; and
- Delegated authority for the Chief Executive to approve termination payments outside of such programmes, up to a maximum of £95,000 per individual per year for staff below Executive Committee level.

These Terms of Reference are currently under review.

3. Workforce Data (Question 4)

As previously advised, and recognised in your response, workforce headcount information is publicly available via our annual reports, and we consider this element of the request to have been appropriately addressed.

4. Public Interest Considerations

We recognise your point regarding the distinction between personal data and anonymised statistical information.

Having considered the request for an internal review, we believe this revised response reflects a more proportionate approach, balancing your request for transparency with our obligations to protect personal data. Having reconsidered the request, we are satisfied that disclosure of aggregated figures, as provided above, does not engage Section 40(2).

5. Outcome of Review

The internal review outcome is therefore:

- Partially upheld – in relation to Questions 1–3, where we have revised our position and now provide aggregated data and relevant governance information;
- Original response maintained – in relation to Question 4, which was correctly addressed.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision, quoting the reference at the top of the page. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House



Water Lane
Wilmslow
Cheshire
SK9 5AF

Yours sincerely,

Ali Jeremy, Director of Communications, Marketing and Engagement

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