

## Publication framework for Senate Minutes

Having separately agreed in principle to publish Senate minutes on the University website, it is appropriate to have an agreed policy on redaction. As defined by the National Archives, “redaction is the separation of disclosable from non-disclosable information by blocking out individual words, sentences or paragraphs or the removal of whole pages or sections prior to the release of the document”.

It is important that key stakeholders are able to see evidence that Senate is working effectively, and therefore redaction should be proportionate and reasonable. Minutes will be published only after they have been approved at the subsequent Senate meeting.

Minutes will be redacted when:

**1. Disclosure would go against the principles of GDPR and the Data Protection Act as they relate to individuals or identifiable groups.**

Typically, but not exclusively, this will include:

- i) reporting on feedback from individuals (other than committee members) or from identifiable groups;
- ii) reporting on the details of individual cases for student facing procedures e.g. appeals, complaints, disciplinary, fitness to practise, support to study and other matters affecting the personal affairs of individual students of the University; and
- iii) reporting on possible appointments, not yet confirmed, and other matters affecting the personal affairs of individuals.

**2. The item of business is commercial in confidence, and disclosure would prejudice or would be likely to prejudice the University’s commercial interests.**

This should be applied, for example, where:

- i) commercial negotiations with a third party are ongoing;
- ii) the university is in a legal dispute with a third party;
- iii) the matter relates to a regulatory issue that is to be concluded and it is not yet appropriate to place information in the public domain;
- iv) there is reasonable evidence that the third party expects the university to maintain confidentiality;
- v) full disclosure of the terms of a concluded agreement could prejudice the university’s ability to make future agreements of a similar nature; and
- vi) there is sensitive operational information including, but not limited to, pricing details received from contractors and suppliers.

**3. A minute is critical of an individual not present at the meeting or otherwise prejudicial, and therefore not able to present an alternative perspective on the facts.**

**4. The minute covers other confidential matters not covered in 1 - 3 above.**

Redaction should not be applied where the minute simply covers matters where the University has not performed as well as it might have hoped or planned.

Senate recognises that it is conceivable that other, unanticipated items could emerge, the publication of which would be considered seriously prejudicial to the University’s interest. Under such circumstances, before determining the appropriate action, the Chair will seek the view of the Vice-Chancellor (and relevant colleagues). When making a decision, consideration of the

exemptions and limitations that the FOI and Data Protection Act are subject to against the legitimate interests of the University, other organisations and individuals will be made. If redaction is applied, this will be reported to the next Senate meeting.

Where items are redacted, at the end of the minute for publication, a note will be added to the effect that Senate considered X other agenda items, which have been redacted in line with the Senate's policy on redaction because they contain information relating to individuals or because they are still commercially confidential.

Apr 2022