



Redaction Policy & Procedure

Core Documentation Cover Page

Redaction Policy & Procedure

Version number	Dates produced and approved (include committee)	Reason for production/ revision	Author	Location(s)	Proposed next review date and approval required
V1.0	Mar 2020 SMT	To ensure that redaction of information is undertaken consistently and appropriately in compliance with relevant legislation.	Executive Assistant & DPFIO	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	Mar 2023

Equality Impact

Positive equality impact (i.e. the policy/procedure/guideline significantly reduces inequalities)

Neutral equality impact (i.e. no significant effect)

X

Negative equality impact (i.e. increasing inequalities)

If you have any feedback or suggestions for enhancing this policy, please email your comments to: quality@uco.ac.uk

Redaction Policy

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1. SCOPE

- 1.1 This policy deals with the redaction and publication and release of minutes of meetings or panels within University College of Osteopathy (UCO), these include minutes of the Board of Directors and Academic Council which are published on the website as standard and for any that might be requested as a freedom of information request or a subject access request.
- 1.2 The aim is to ensure that an open, transparent and clear policy is in place for the redaction of certain information contained within meeting and minutes which would be inappropriate to disclose publicly and for the protection of personal data.
- 1.3 The Redaction Policy applies to all employees, directors, advisers, consultants and officers who may be involved in redacting meeting or panel minutes or processing freedom of information and subject access requests.
- 1.4 This policy shall be reviewed at least every three years.

2. REASONS FOR REDACTION

- 2.1 Information may be published or released in redacted form where this is necessary to protect commercial confidentiality, candid debate, financial stability or protection of personal data. All redactions must be limited to the extent that they are necessary, reasonable and justifiable.
- 2.2 The information that may be redacted, and reasons for this, is explained below:
 - Commercial confidentiality or sensitivity
 - This is any information which:
 - If disclosed to a competitor, would be liable to cause real (or significant) harm to the UCO;
 - May damage the reputation or the confidence that customers, suppliers, members or stakeholders may have in the UCO;
 - Threatens the ability to obtain supplies or secure finance;
 - Includes details of staff (including personal information), members, third- party contracts / suppliers
 - Candid Debate
 - The UCO encourages candid debate, including during investigation, disciplinary and similar panels and normal business meetings. Information will normally be redacted from such records where third parties have not consented to have their personal information disclosed in accordance with current data protection legislation or where the information is commercially sensitive in line with freedom of information legislation.
 - Information Provided in Confidence
 - Where the UCO have expressly agreed to keep information confidential, there is a duty of confidence, provided that the information has the

necessary quality of confidence. This would also apply where the nature of the information or the circumstances in which the information is obtained imply that the information should be kept confidential.

- Legal and Professional Privilege
 - This may include communications between UCO and (a) external lawyers in private practice (solicitors or counsel), and (b) in- house legal advisers, provided that the information has been given either for the purpose of obtaining legal advice or there is a reasonable prospect of litigation or litigation is pending.
- Prohibition
 - Publication of information may be prohibited for the following reasons:
 - Where there is an existing statutory bar to disclosure.
 - Where disclosure would be incompatible with a legal obligation.
 - Where disclosure is prevented by the common law duty of confidentiality.
- Data Protection
 - Publication of information may be prohibited where an exemption may apply in line with current data protection legislation (General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA)).
 - When responding to a Subject Access Request (under the GDPR and the DPA).
 - When proactively making information available under the Freedom of Information Act 2000 (FIA) or the Environmental Information Regulations 2004 (EIR).
 - When responding to a Freedom of Information Request under the FIA or EIR and disclosing third party personal information would breach the GDPR / DPA.

3. BOARD OF DIRECTOR & ACADEMIC COUNCIL MINUTES

- 3.1 The Clerk to the Board will be responsible for ensuring that Board of Director and Academic Council meeting minutes are redacted appropriately.
- 3.2 Two sets of minutes will be held by the UCO: (1) a full, un-redacted set for Board or Academic Council distribution only; (2) a redacted set with the relevant text deleted and the reason for redaction appearing after the number of the minute item. Only the fully redacted set will be published on UCO's website.
- 3.3 Redacted minutes for Board of Directors and Academic Council will be published on the Company's website once they have been agreed by the Board (usually at the following Board meeting) within a month of that approval Board meeting. The Clerk to the Board is responsible for publishing redacted minutes.

4. CONFIDENTIAL MEETINGS, COMMUNICATIONS & OTHER RECORDS

- 4.1 It is the responsibility of all UCO stakeholders to ensure that when they share or publish information, it is reviewed carefully to ensure that any personal or confidential information is not shared or published in error or without due consent.
- 4.2 Confidential meetings include those related to disciplinary cases, complaints, grievances, fitness to practice and other meetings of a personal nature that are recorded formally and kept on file, either on paper or electronically.
- 4.3 Communications include those of a confidential nature and include email communications, online forum messages, text messages, etc.
- 4.4 Records include both paper and electronic records held within a filing system or a database.
- 4.5 The following Redaction Procedure should be followed in all cases.

5. REDACTION PROCEDURE

- 5.1 If information needs to be redacted prior to publication or sharing of information the document / record owner responsible for redacting should consult the [Redaction Toolkit published by the National Archives](#) to ensure that the most appropriate redaction method is used for the type and format of document / record concerned.
- 5.2 Following redaction, a second appropriate member of staff should review the original and the redacted document / record to confirm that the redaction has been undertaken and completed appropriately, referring to the redaction toolkit as appropriate. Both staff members should complete the Redaction Confirmation Form (Appendix 1) to verify that this has been completed.
- 5.3 Both the original and the redacted version of the document / record must be kept by the document / record owner responsible for the redaction in line with the UCO's Retention Schedule.
- 5.4 Only a copy of the redacted document / record should be provided to a third party.

6. GUIDANCE & SUPPORT

- 6.1 Guidance and support for redacting a document / record is available from the UCO's Executive Assistant or Data Protection & Freedom of Information Officer.
- 6.2 Guidance about how to disclose information safely is also published by the [Information Commissioner's Office](#).

APPENDIX 1: REDACTION CONFIRMATION FORM

Document / Record Title:	
Document / Record Owner: (Name & Role Title)	
Reason for Redaction:	
Date of Redaction:	
Redaction Reviewed & Confirmed by: (Name & Role Title):	
Date Redaction Reviewed & Confirmed:	