

**Brasenose College**  
**POLICY ON CONFIDENTIALITY (Governance and management)**  
**Approved by Governing Body on 12<sup>th</sup> March 2014**

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Brasenose College values openness and transparency, and the Governing Body and its committees, Officers and staff aspire to operate as openly as possible with Fellows, students and staff. The College also operates as a public body for the purposes of the Freedom Of Information Act.

This policy lays out the circumstances when the College needs to keep some aspects of its operations confidential within the governance and management processes.

Confidentiality of student records and on welfare matters are dealt with under separate policies.

## **1. General**

- 1.1 The reasons for confidentiality will usually fall in to one of the following categories:
  - i) Legal restrictions on disclosure, such as under the Data Protection Act 1998
  - ii) Personal matters relating to individuals (including but not limited to contact details, elections, pay, health etc.). Such details will not be disclosed without express permission of the individual, except where it is a legal requirement. This applies to all individuals including but not limited to students, staff, alumni, Fellows and members of the SCR.
  - iii) Commercial matters, where public disclosure might reduce the College's effectiveness operationally or financially
- 1.2 The College and its members have a duty to make disclosures required by law, notwithstanding this policy, except where an exemption is conferred on an individual by their professional status (eg medical confidentiality).
- 1.3 It is recognised that ICT Officers have access to all electronic data, and they are expressly instructed not to access, read or otherwise use any confidential or sensitive data.

## **2. Personnel**

- 2.1 All personal data and sensitive personal data is treated in accordance with the Data protection Act 1998, where applicable, including the use, sharing, recording and storage of information.
- 2.2 Personnel files and all records relating to individuals are restricted to the individual concerned, their manager, the Bursar, HR and Finance staff as necessary, and for academic staff, the Senior Tutor and Academic Administrator. Specific information will be provided as required to committees, other Officers, tribunals etc.
- 2.3 Payroll information is restricted to line managers, Bursar, HR Manager, HR team, College Accountant and relevant people in the Finance Bursary.
- 2.4 Recruitment: all information about candidates must be treated as confidential, with papers returned to HR, who will retain or dispose as appropriate.
- 2.5 References received are not disclosable to the individual unless otherwise stated. References for non-academic employees provided by College follow a format agreed

with HR. Any variation must be approved by HR Manager to ensure that information disclosed is appropriate in its detail and does not expose the college to undue risk.

### **3. Governing Body**

- 3.1 In addition to members of Governing Body, meetings will be attended by Fellows in their first year of office, a minute secretary (usually the Principal's secretary) and Fellows who are not members GB but are designated by GB as regular attendees (eg. Development Director). Other people may be required or invited to attend for appropriate items.
- 3.2 In addition, the presidents of JCR and HCR will be invited to attend Open Business.
- 3.3 Most business will be Open Business, but matters relating to individuals (including Fellowship, grants, buy outs and pay) or matters of commercial sensitivity will be in Closed Business, as will matters of particular sensitivity that are in early stages of discussion. Officers will determine whether business is Open or Closed when preparing the agenda for the meeting.
- 3.4 GB papers will be circulated to all invitees and attendees, and additional copies are circulated to Domestic Bursar, HR Manager, College Accountant and Academic Administrator
- 3.5 GB papers are all confidential and restricted to invitees and attendees and should not be copied or sent on to other parties without the permission of the author of the paper being circulated or the Principal.
- 3.6 The JCR and HCR Presidents receive Open Business papers and may circulate these to relevant members of their committees, but must emphasise to recipients that these are confidential and not for further circulation.
- 3.7 Discussions at GB and individual views expressed should not be repeated to those who were not eligible to attend the meeting.
- 3.8 Decisions reached will be communicated by the relevant Officer to the wider College as appropriate.
- 3.9 Governing Body email list includes all members of GB, regular attendees and, for administrative efficiency, the secretarial support for the Principal and Officers.
- 3.10 Governing Body papers should be held securely or disposed of securely. Papers left in the meeting room will be collected and disposed of securely by the minute secretary.

### **4. Committee meetings**

- 4.1 Meetings will be attended by members and co-optees to the committee, relevant officers listed in term of reference, and other people by invitation.
- 4.2 Committee meetings which include student representatives may be split into Open and Closed Business, if some business requires confidentiality by the reasons laid out in Clause 1.1, or by other similar reasons.
- 4.3 Minutes of meetings at which there are no students will be assumed to be Open Business and included in Open Business papers at GB, except for those sections of the Minutes marked as Closed Business. Personnel and Remuneration Committee meetings will always be Closed Business.
- 4.4 Committee papers are all confidential and restricted to invitees and attendees of the relevant committee and members of Governing Body and should not be copied or sent on to other parties without the permission of the author of the paper being circulated or the chair or convenor of the committee.

- 4.5 Attendees from JCR and HCR receive Open Business papers and may circulate these to relevant members of their committees, but must emphasise to recipients that these are confidential and not for further circulation.
- 4.6 The discussions at and outcomes from committees should only be discussed with invitees, attendees and members of Governing Body and should not be repeated to other parties. Views expressed in the meeting should not be attributable to individuals in reports of proceedings to anyone not invited to be at the meeting.
- 4.7 Recommendations from the committee or decisions reached will be communicated by the relevant Officer to the wider College as appropriate.

**5. Emergency contact details**

- 5.1 Emergency contact details for all staff are held by HR and will not be passed on to anyone else, except in emergency.
- 5.2 Some members of staff may be requested to leave contact details for emergencies with the Domestic Bursary and the Porters lodge. These numbers will not be given to others (including Fellows), but on request, the Domestic Bursar or porters may call the emergency contact number to pass on urgent messages.

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12<sup>th</sup> March 2014