

Ref. FOI/20210205/03

05 March 2021

Reply to request for information under the Freedom of Information Act	
Your ref	Email of 5 February 2021
Request	<p>This is a request under the Freedom of Information Act 2000 (FOIA). Please provide any information that you hold answering to any of the following descriptions:</p> <ol style="list-style-type: none">1. Any application you made in 2019 or 2020 to be a "Stonewall Diversity Champion" or to be included on Stonewall's "Workplace Equality Index," including any attachments or appendices to those applications. Please redact personal details if necessary.2. Any feedback you received in 2019 or 2020 from Stonewall in relation to either application or programme.3. Any other communication you have received from Stonewall in 2019 or 2020 unless privileged or otherwise exempt from disclosure (but if you claim privilege or exemption in relation to any material, please say in broad terms what the material is and the basis on which you claim to be entitled to withhold it).4. Full details of any equality impact assessment you carried out connected with any of these applications (including any equality impact assessment carried out prior to an earlier application of the same kind, if no further assessment was done).5. Details of the total amount of money you paid to Stonewall (i) in 2019; (ii) in 2020, whether or not as payment for goods or services.6. Whether you intend to continue your membership of any Stonewall scheme in the future, and if so which.

Dear E Pasternack

I write in reply to your email of 5 February, requesting the above information.

Items 1 – 3:

Please find the information requested at the following annexes to this letter:

- Annex A: Workplace Equality Index (WEI) 2020 application
- Annex B: attachments to WEI application.

We are collating the application feedback and communications for points 2 – 3 of your request, and aim to provide an update on this part of the request by 12 March.

We have redacted from the annexes the names of staff members and any other information that could be used to identify them, except where the information relates to those in senior, public facing roles. In making these redactions, we have applied the exemption in section 40(2) of the Freedom of Information Act (FOIA). Section

40(2) provides an exemption from disclosure for information that is the personal data of an individual other than the requester, where disclosure would breach any of the data protection principles in Article 5 of the General Data Protection Regulation (GDPR). We consider that disclosure of the information requested would breach the first data protection principle, which requires that personal data is processed lawfully, fairly and in a transparent manner. Disclosure would be unfair to the individuals concerned, as it would be contrary to their reasonable and legitimate expectations. They would not reasonably expect the information in the annexes to be made public in an attributable form under the FOIA without their consent. (Please note that a disclosure of information under FOIA is presumed to be a disclosure to the world at large, and not just a disclosure to the individual making the request.)

For the disclosure of personal data to be lawful, it must have a lawful basis under Article 6 of the GDPR. There are six possible lawful bases in Article 6; we do not consider that any of them would be satisfied in respect of the disclosure.

Item 4:

No equality impact assessment was carried out in relation to this application.

Item 5:

The University paid £2,500 (not including VAT) to Stonewall in each of 2019 and 2020.

Item 6:

The University is a Stonewall Diversity Champion for 2021, and has no plans to end its subscription.

INTERNAL REVIEW

You may request an internal review of this response by e-mailing foi@admin.ox.ac.uk. A request for internal review should be submitted no later than 40 working days from the date of this letter.

THE INFORMATION COMMISSIONER

If, after the internal review, you are still dissatisfied, you have the right under FOIA to apply to the Information Commissioner for a decision as to whether your request has been dealt with in accordance with the FOIA. You can do this online using the Information Commissioner's complaints portal.

Yours sincerely

Information Compliance Team