

Ref: 202207/1042

23 August 2022

Reply to request for information under the Freedom of Information Act	
Your ref	Email of 30 July 2022
Request	<ol style="list-style-type: none">1. Confirm whether your organisation applied to be part of the Stonewall Workplace Equality Index in A) 2018 (for 2019), B) 2019 (for 2020) or C) 2021 (for 2022) (NB the index was suspended in 2020/21 because of Covid)2. Give details of the total amount of money you paid to Stonewall in 2021 whether or not as payment for goods or services.3. State whether you intend to continue your membership of any Stonewall scheme in the future, and if so which. <p>If the answer to any part of 1 is yes please supply:</p> <ol style="list-style-type: none">4. Any application you made in 2021 to be included on Stonewall's Workplace Equality Index, including any attachments or appendices to those applications. Please redact personal details if necessary.5. Any feedback you received in 2018/19 or 2019/20 or 2021/22 from Stonewall in relation to either application or programme. This must include the priorities or objectives written by your organisation's representative at the end of the feedback form (under the heading 'Priorities for the year ahead' in 2019; 'Your priorities' in 2020).

Dear A McNaughton

I write in reply to your email requesting the information detailed above.

Item 1:

The University of Oxford applied to be part of the Stonewall Workplace Equality Index (WEI) in 2018, 2019 and 2021.

Item 2:

The University paid £2500, plus VAT, to Stonewall in 2021 for membership of the Diversity Champions Programme.

Item 3:

The information requested is not held.

Items 4 – 5:

Please find the information requested at annexes A and B to this letter.

We have redacted from the annexes the names of any individuals and any information which could be used to identify them, except where this relates to individuals in public facing roles.

In taking this measure, we are applying the exemption in s 40(2) of the Freedom of Information Act. 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 in the exact form 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 that information relating to them would be made public under the FOIA without their consent.

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.

The exemption in section 40(2) is an absolute exemption and is not subject to the public interest test provided for in section 2(2)(b) of the FOIA.

INTERNAL REVIEW

If you are dissatisfied with this reply, you may ask the University to review it, by writing to the Head of Information Compliance at 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