



N Jones

Sent by email only to request-724964-03fb650f@whatdotheyknow.com

15 October 2021

FREEDOM OF INFORMATION ACT 2000 (FOIA) REQUEST – REQUEST REF: FOI 021 - 089

Dear N Jones

We refer to the email sent by you (using email address request-724379-5f344d7f@whatdotheyknow.com) received by University College London (“we” or “us”) on 4 February 2021, containing a freedom of information request pursuant to FOIA which is set out in more detail below (the “**FOI request**”).

1. The FOI request

The FOI request was for the provision of any information held by us pertaining to the six limbs set out at paragraph 2 below. After undertaking the necessary searches for information in order to respond to the FOI request, we can confirm that we hold information pertaining to the various limbs listed at paragraph 2 below (the “**Documents**”). We have listed the Documents in the table annexed to this letter (the “**Table**”) by reference to the limbs of the FOI request to which they relate. We have also responded to each limb of the FOI request at paragraph 2 below.

We can confirm that we are able to disclose some of the Documents in unredacted form. However, as you will note when reviewing column d) of the Table, we have concluded that some of the information contained in the Documents is exempt from disclosure under the relevant sections of FOIA and as such we have prepared redacted versions of the applicable Documents for disclosure, which are enclosed for your review.

The redactions rely on a combination of ss40 and 43 of FOIA and we have provided details of the exemption relied upon and our rationale as to why this is the case in column f of the Table.

2. Our responses

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.*

Response: An application to the Stonewall Workplace Equality Index (“**WEI**”) was made by UCL in September 2019 for the 2020 ranking. A redacted version is enclosed. No submission was made in 2018 for the 2019 ranking. UCL was a subscribing member of the Stonewall Diversity Champions Scheme in 2019. UCL did not renew its subscription in 2020. UCL is not currently a member of the Stonewall Diversity Champions Scheme. Please note that some documents used in support of UCL’s WEI 2019 application, in particular policy documents, are available on UCL’s website (please see https://www.ucl.ac.uk/human-resources/policies-advice/all-policies?collection=drupal-professional-services-policies&meta_UclOrgUnit=%22UCL+Human+Resources%22&facetssort=alpha&) and, as we are not required to release information if it is reasonably accessible to you in another way pursuant to section 21 FOIA, these have not been included in the Documents.

2. *Any feedback you received in 2019 or 2020 from Stonewall in relation to either application or programme.*

Response: UCL did receive feedback from Stonewall on its 2019 submission for 2020 WEI ranking. Redacted versions of the applicable emails and documents are enclosed.



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).*

Response: UCL received various emails from Stonewall in 2019 and 2020, redacted copies of which are enclosed.

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).*

Response: No formal equality impact assessment was undertaken.

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.*

Response: A subscription fee of £5,000 plus £1000 VAT was paid to Stonewall to join the Stonewall Diversity Champions Scheme was made in 2019, no payment was made in 2020. This fee included access to research and resources on the members-only area of the Stonewall website and a named contact for advice and support. No fee is required to participate in the Stonewall Workplace Equality Index.

6. *Whether you intend to continue your membership of any Stonewall scheme in the future, and if so which.*

Response: As stated above UCL is not currently a member of the Stonewall Diversity Champions Scheme or any other Stonewall schemes.

Conclusion

If you are unhappy with our response to your request and wish to make a complaint or request a review of our decision, please email foirequests@ucl.ac.uk. Emails should include the words 'Internal Review' in the subject and be marked For the Attention of the Chief Operating Officer, alternatively you should write to:

Chief Operating Officer
University College London
Gower Street
London
WC1E 6BT

Please note, complaints and requests for internal review received more than two months after the initial decision will not be handled.

Please note the information supplied to you continues to be protected by the Copyright, Designs and Patents Act 1988. You are free to use it for your own purposes, including any non-commercial research you are doing and for the purposes of news reporting. Any other reuse, for example commercial publication, would require the permission of the copyright holder. Most documents supplied by us will have been produced by UCL employees or faculty members, however, where documents have been produced by a third party you must ensure that you gain their permission before reproducing any third party information.

Yours sincerely

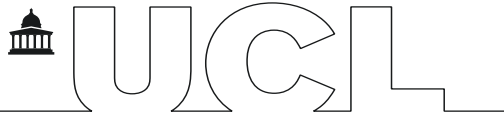


UCL

Mehwish Sultan
Senior Data Protection and Freedom of Information Adviser
University College London

Enclosed:

- Zip folder containing the Documents



Annex

Item No	a) Original Document type	b) Document name	c) Limb of FOI request	d) Redactions applied (Y/N)	e) Exemption which applies	f) Rationale
1.	Email – 24 Jan 2020	Benchmark follow up	2 and 3	Y	<ul style="list-style-type: none">i. s40(2) (Personal information)ii. s43(1) (Commercial interests)	<ul style="list-style-type: none">i. The information is exempt information as it constitutes personal data and its disclosure would contravene the data protection principles under the Data Protection Act 2018.ii. The information is exempt information as its disclosure would prejudice the commercial interests of any person, in this case Stonewall. The public interest test applies where this exemption is relied upon and, in our view, the public interest test falls in favour of withholding the information rather than disclosing it on the basis that a) feedback and advice provided by Stonewall to WEI participants is a key commercial asset and disclosure would likely give competitors entering the same market an unfair advantage and may undermine other participants' confidence in Stonewall's WEI and b) there is no obvious public interest in disclosing the information, for example, it does not relate to any major public policy decisions or instances of wrongdoing.
2.	Email – 16 Jan 2020 2020	Stonewall Membership - Expiring soon	2 and 6	Y	s40(2) (Personal information)	See above at 1(f)(i).
3.	Email – 22 Jan 2020	Fwd: Stonewall Benchmark Report & SFQ	2 and 3	Y	s40(2) (Personal information)	See above at 1(f)(i).



4.	Word Document	Written Feedback Report (Full Colour) - University College London – 0001010. Please note, this email contained an attachment which has been withheld in its entirety on the basis of the rationale set out at column f.	2	Y	s43(1) (Commercial interests)	See above at 1(f)(ii).
5.	Word Document	Staff Feedback Questionnaire Report - University College London - 0001010	2	N	N/A	N/A
6.	Email – 2 Jan 2019	Happy new year from Stonewall	3	Y	s40(2) (Personal information)	See above at 1(f)(i).
7.	Email – 22 Feb 2019	Higher Education Network of Networks meeting	3	Y	s40(2) (Personal information)	See above at 1(f)(i).
8.	Email – 22 Jan 2020	RE: contact details for Stonewall Diversity Champions Scheme	3	Y	s40(2) (Personal information)	See above at 1(f)(i).



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9.	Email – 23 Sept 2020	RE: Stonewall Diversity Champions membership	2, 3, 5 and 6	Y	<ul style="list-style-type: none">i. s40(2) (Personal information)ii. s43(1) (Commercial interests)	<ul style="list-style-type: none">i. See above at 1(f).ii. The information is exempt information as its disclosure would prejudice the commercial interests of any person, in this case UCL. The public interest test applies where this exemption is relied upon and, in our view, the public interest test falls in favour of withholding the information rather than disclosing it on the basis that a) the information is not germane to the main purpose of the request, b) the information is sensitive as to relates to the internal budgeting strategy for one of UCL's departments and that department's commercial relationships with other suppliers and c) there is no obvious public interest in disclosing the information, for example, it does not relate to any major public policy decisions or instances of wrongdoing.
10.	Email – 15 January 2020	WEI Results 2020	2 and 3	Y	s40(2) (Personal information)	See above at 1(f)(i).
11.	PDF	university-college-london-submission to Stonewall 2020 WEI (redacted)	1	Y	s40(2) (Personal information)	See above at 1(f)(i).



12.	Word document	Q2.1 B commitment in job packs	1	Y	s40(2) (Personal information)	See above at 1(f)(i).
13.	Word document	Q2.5A legislation + policy	1	N	N/A	N/A
14.	Word document	Q2.5B language stereotypes and assumptions	1	Y	s40(2) (Personal information)	See above at 1(f)(i).
15.	Word document	Q2.5C challenging behaviour	1	Y	s40(2) (Personal information)	See above at 1(f)(i).
16.	Word document	Q2.5D Bullying & harassment	1	N	N/A	N/A
17.	Word document	3586371609-2019 - Q4.1 advertising the Friends network	1	N	N/A	N/A
18.	Word document	3586371603-Q4.2 A importance of allies	1	N	N/A	N/A
19.	Word document	3586371576-Q4.2B discrimination of LGBT people	1	N	N/A	N/A
20.	Word document	3586371552-Q4.2C Personal stories of LGBT people	1	Y	s40(2) (Personal information)	See above at 1(f)(i).
21.	Word document	3586371597-Q4.2D Action allies can take	1	N	N/A	N/A
22.	Word document	Q8.1 Example tweets from UCL main twitter with 64K followers	1	Y	s40(2) (Personal information)	See above at 1(f)(i).
23.	Word document	Q8.1 tweets from the ioe	1	N	N/A	N/A
24.	Word document	Q8.5 Trans Screenshots.docx	1	Y	s40(2) (Personal information)	See above at 1(f)(i).



25.	Slide deck	Q9A4 anti bullying + harassment training	1	Y	s40(2) (Personal information)	See above at 1(f)(i).
26.	Slide deck	Q9A4 inclusive teaching practice training	1	Y	s40(2) (Personal information)	See above at 1(f)(i).
27.	Word doc	3586371975-Q9A5 example of communications demonstrating LGBT inclusion to students	1	Y	s40(2) (Personal information)	See above at 1(f)(i).