

## Redactions policy

1. The proviso to the publication of Board meeting minutes is that they will be subject to redactions. On 25 March 2021, at the Special General Meeting, we told attendees the redactions would be minimal but that we needed to ensure a balance was struck between being “transparent” and ensuring we didn’t leave the organisation open to any liability for breaching our duties to individuals.
2. The following principles in respect of redactions will apply:
  - a) FCHS / Southwark staff / residents’ names would be redacted (initials could remain)
  - b) Any record which would reveal any resident’s address on the estate
  - c) Operational HR matters may require redaction and would be considered on the specifics of the record
  - d) Any record where disclosure would or could amount to a breach of confidentiality towards an individual/organisation
  - e) Any record which may cause prejudice to FCHS or any other party to legal proceedings whether or not proceedings have already commenced or are anticipated.
3. The following procedure for approving redactions will be followed:
  - a) During the Board meeting, following the minutes being agreed as an accurate record of the meeting, a review will be conducted to consider any specific redactions.
  - b) Proposed redactions must be in accordance with the principles set out above.
  - c) The Chair is responsible for noting redactions to be made.
  - d) Within 2 days of the meeting, the Chair will liaise with the Estate Manager as necessary prior to circulating redacted minutes to the Board for final agreement.
  - e) Redacted, checked & signed minutes to be uploaded within a reasonable period, no later than 2 weeks after the Board meeting where redactions are approved.