



IRB Transparency Update

STATUS

- Open
- For Information

EXECUTIVE SUMMARY

1. ICAEW Regulatory Board (IRB) requested information on the publication of IRB papers and minutes. This paper provides data on the number of papers published since August 2021 and information on associated themes.

BACKGROUND

1. In June 2021, the IRB agreed to adopt a greater level of transparency, including the publication of meeting minutes and papers. However, it was recognised that it would be necessary to withhold or redact papers in some circumstances. Accordingly, it was agreed that papers that were deemed to fall in any of the following exemption criteria would be redacted or not published:
 - a. *Documents that include commercially sensitive information or relate to emerging strategy or policy*
 - b. *Papers that include personal data or matters involving an identified individual or business that is protected or where there is a reasonable expectation of confidentiality*
 - c. *Any document that includes legal or other information where there is a right or expectation of privilege*
 - d. *Where the IRB is considering risk and the publication of any associated paper may cause an increase in the level of risk to ICAEW as a whole, to the Professional Standards department, and ultimately to other stakeholders*
2. Guidance was issued before the August meeting advising those preparing papers that all papers would be published in full unless an exemption applied. A copy of the guidance is attached as an annexe.

Current Position

3. Approved minutes and agendas are published. Papers assessed as falling into one of the agreed exemptions are not published. A summary of unpublished papers is created and includes the following information:
 - The title of the unpublished paper
 - A list of the applicable exemptions to publication
 - A list of unpublished annexes
4. Where possible, the unpublished papers' summary includes links to externally available documents and information indicating whether or not withheld papers will be available in the future. For example, where a copy of a draft consultation response is withheld pending its final submission, information is provided on when a final version will be released and how it can be accessed. Table 1 provides a summary of the core data on published papers.

Table 1

	August 21	October 21	December 21	February 22	April 22	June 22
Number of Papers	10	6	6	9	9	9
Published in Full or Redacted	3	3	0	3	1	3
Withheld	7	3	6	6	8	6

5. Unless specified otherwise, annexes fall within the same classification as the main paper. Where an annexe is assessed as falling within one or more of the exemptions, whether or not the main paper has been published, it will be included in the schedule of unpublished papers.
6. It is noted that not all papers include complete annexes. The IRB bundle often includes other documentation, including copies of presentations or other material. Any documentation included in the IRB papers is assumed to be published. This assumption and papers not being included in an annexe may result in documents that could otherwise be published being missed or withheld. Similarly, unmarked documents may be published by default.
7. It has been necessary to redact or otherwise amend titles of particularly sensitive papers to enable them to be included in the summary of unpublished papers.
8. A list of withheld papers for all meetings between August 2021 and June 2022 is attached at annexe B.

APPENDICES

Appendix A: Copy of guidance notes sent to drafters

Appendix B: List of unpublished papers August 2022 to June 2022

Executive Director

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Date of report	6 October 2022