

Gwasanaethau Corfforaethol ac Arolygiaethau
Corporate Services and Inspectorates



Llywodraeth Cymru
Welsh Government

Mark Isherwood MS
Chair of the Public Accounts and Public
Administration Committee
Welsh Parliament
Cardiff Bay, Cardiff
CF99 1SN

4 February 2025

Dear Mr Isherwood,

In 2019 PAPAC made a recommendation 'Welsh Government to work with sponsored bodies to review Board and Audit Committee meeting information to develop a consistent minimum'. This was discussed at the Public Leaders Forum in 2020 when it was agreed to set up a working group to implement the recommendation. Work on this was delayed due to the pandemic but I'm pleased to say that a discussion at the May 2024 meeting of the Public Leaders Forum resulted in a working group being set up with input from chairs, chief executives and Audit Committee members. The group produced a draft set of principles which have now been signed off by the December meeting of the Public Leaders Forum. The principles for the publication of minutes are not mandatory. They do however represent good practice for Boards and Audit Committees. They are intended to allow flexibility – for example when commercially sensitive, security or pay negotiations are discussed. The principles also draw attention to data protection implications and give a contact point for further advice on this point.

I will arrange for them to be posted on the Welsh Government's website and send a link to chairs and chief executives.

A copy of the principles is at Annex 1.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tim Moss'. The signature is written in a cursive style with a horizontal line above it.

Tim Moss
Cyfarwyddwr Cyffredinol a Phrif Swyddog Gweithredol
Llywodraeth Cymru
Director General and Chief Operating Officer
Welsh Government

Annex 1

Principles for the publication of Welsh Public Sector Board and Audit Committee meetings

Introduction

The devolved public sector in Wales consists of many different public bodies, some of which are regulated under the Governance Code for Public Appointments while many more are unregulated. Bodies and their Boards are also subject to various legal duties according to company and charity law and other legislation. Board meetings take different forms, some are held in public and others in private while some have a mix of both. These principles are intended to cover all types of Board and Audit Committee meetings.

The principles are for guidance only, to set standards which have been agreed by the Public Leaders Forum on 4 December 2024.

The Principles

1. The publication of information about Board and Audit Committee meetings enable a public body to be transparent about its ways of working and its decision making which leads to greater accountability. Sharing information proactively leads to greater understanding of how a Board or Committee grapples with and resolves issues. When done in an open, accessible way it can lead to greater engagement with the community it serves so that there is confidence in how the public body carries out its work and greater trust in the organisation.
2. These principles are intended to apply to Board and Audit Committee meetings. It will be for each Board to consider whether they should apply to meetings of other sub-groups of the Board.
3. There should be a default position that information will be shared with the public unless there are reasons why the information shouldn't be in the public domain. For example, information about security, commercially sensitive or information which would be excluded under Freedom of Information requests should not be publicly available. Care should also be taken with the inclusion of personal data.
4. Publication can take the form of minutes or summaries of meetings. It is up to each Board and Committee to decide which will be most appropriate. Considerations when taking this decision should include not stifling debate at meetings, becoming risk averse and leading to unintended consequences including business being held through informal discussion rather than through a formal meeting. It is for each Board and Committee to decide whether to publish papers which have been circulated ahead of the meeting to Board or Committee members.
5. Both summaries and minutes can be produced where the Board or Committee think this is the most practical approach. It may be helpful to do this where full details of speakers or discussions are needed to be kept for internal record and for the effective running of the organisation.
6. The audience for the minutes or summary should be considered. Accessibility to the general public should be paramount. Text should be engaging and informative. Minutes or summaries should be set out in plain English or Welsh, with acronyms spelled out the first time they are used and jargon minimised.
7. Minutes or summaries should present a coherent picture of decision making. They should set out what was the item under discussion and what was the outcome of the

discussion. Where decisions have been difficult to reach, this should not prevent transparency. Being open with the public about difficult decisions can help manage public expectations.

8. Minutes or summaries should make it clear what actions arise from the discussion and how they have been taken forward including what was the outcome of the actions.
9. Unless there is a specific reason to name an individual and/or their role, the approach should be to summarise discussion and points made without attributing who made each particular point. Including individuals' names in published meeting minutes or summaries must comply with UK GDPR, as their name and their work title are their personal data. Individuals must be informed before the meeting takes place. Consideration should be given to using job titles rather than names (although, it should also be remembered job titles are also personal data where they apply to a specific person), particularly in the case of people who are not senior or where publishing their names could result in security concerns. Individuals who are quoted should have the opportunity of confirming the accuracy of the record as they recall it before minutes are published,
10. Minutes or summaries should be put in the public domain as soon as they have been agreed by the Board or Committee. There is a balance to be struck between waiting for the next meeting and putting making the information publicly available while it is topical. Consideration should be given to agreeing text in between meetings if there is a long gap (3 months or more) between meetings. It should be clear how long the minutes/ summary will remain publicly available (there should be some form of time limit).

For further information on the data protection implications of publishing minutes and summaries or the implications for reports by internal audit, please contact AuditAssuranceandCounterFraud2@gov.wales