Greater Cambridge Development Corporation ("GCDC")

Transparency Policy

Adopted By The Board On 20 October 2026

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1. PURPOSE

1.1 Greater Cambridge Development Corporation ("**GCDC**") is committed to operating openly, transparently and accountably. This Transparency Policy ("**Policy**") sets out GCDC's approach to transparency and accountability. It also brings together and signposts the legal, governance and administrative requirements that support that approach.

1.2 The requirements referred to in this Policy arise from legislation, the Framework Document, the Board Terms of Reference and GCDC's other governance arrangements.

1.3 GCDC recognises that transparency is fundamental to maintaining public confidence in its activities, enabling effective scrutiny of decision-making, demonstrating proper stewardship of public money and public assets, supporting ethical conduct by Board members, committee members, staff and advisers, and ensuring that communities, partners, public authorities, businesses and other stakeholders can understand GCDC's role, powers, priorities, performance and decisions.

1.4 This Policy establishes GCDC's transparency principles, its proactive publication commitments, its approach to the Information Commissioner's approved model publication scheme, the handling of information requests, circumstances in which information may lawfully be withheld or redacted, and the governance arrangements that support compliance with this Policy.

1.5 This Policy applies to all Board members, committee members, employees, secondees, contractors, consultants and advisers acting for or on behalf of GCDC.

1.6 This Policy is intended to operate as an umbrella transparency framework and should be read together with GCDC's supporting governance, financial, procurement, information governance, records management, complaints, whistleblowing, anti-fraud and market-sensitive information documents.

1.7 Persons to whom this Policy applies must:

1.7.1 support the proactive publication of information where publication is lawful and proportionate;

1.7.2 identify information that may require redaction, deferred publication or withholding;

1.7.3 protect personal data, confidential information, legally privileged material, commercially sensitive information and market-sensitive information;

1.7.4 comply with applicable records management and information governance requirements;

1.7.5 assist GCDC in responding to requests under FOIA and EIR;

1.7.6 maintain any registers, logs and records for which they are responsible; and

1.7.7 raise any actual or potential breach of this Policy with the General Counsel.

2. STATUS AND SCOPE

2.1 GCDC will apply transparency standards appropriate to a public body and, where applicable, an MHCLG-sponsored arm's-length body or non-departmental public body.

2.2 Where GCDC is subject to a specific statutory, regulatory, sponsor department or framework document requirement, that requirement will take precedence over this Policy.

2.3 Where this Policy adopts requirements or standards by way of best practice, GCDC will apply them on a "comply or explain" basis. Where GCDC determines that a requirement is not applicable, is not proportionate, or cannot lawfully be met in full, the relevant accountable owner must record the reason and, where appropriate, publish an explanation.

2.4 Nothing in this Policy requires GCDC to publish information where publication would breach the law, prejudice the public interest, compromise legal privilege, disclose personal data unlawfully, breach a duty of confidence, prejudice commercial negotiations, undermine procurement integrity, compromise security, create market abuse or inside information risks or impose an unreasonable administrative burden having regard to the resources of GCDC.

2.5 References in this Policy to "Board members" are references to members of the board of the corporation as defined in the GCDC's Board Terms of Reference as updated by the Board from time to time.

3. TRANSPARENCY PRINCIPLES

3.1 Openness by default

The information described in Schedule 1 should be published unless there is a lawful, proportionate and documented reason not to publish it.

3.2 Useful transparency

Transparency should help the public understand what GCDC is for, how it is governed, how it makes decisions, how public money is used, how it performs, and how concerns or complaints may be raised.

3.3 Timeliness

Information should be published promptly and in accordance with the publication schedule in Schedule 2.

3.4 Accessibility

Information should be easy to find, understand, access and re-use. GCDC will publish information in accessible formats and will seek to use HTML, CSV, open spreadsheet formats and other open formats where appropriate. GCDC recognises that some members of the public may be unable to access an Open Meeting livestream because they do not have internet access or suitable technology. Where a person notifies GCDC of this difficulty, GCDC will, where reasonably practicable and having regard to the notice given and the resources available, use reasonable endeavours to make alternative arrangements to enable that person to observe the livestream. Any alternative arrangements will be determined by GCDC in the circumstances and need not include admission to the room in which the Open Meeting is taking place.

3.5 Accountability

GCDC will identify accountable owners for key transparency obligations and will report performance to the Audit and Risk Assurance Committee and Board.

3.6 Integrity

GCDC will maintain arrangements to identify and manage conflicts of interest, gifts and hospitality, lobbying, procurement risks, fraud, bribery, corruption, market-sensitive information and inappropriate disclosure.

3.7 Proportionality and lawful restraint

GCDC will balance transparency against its legal duties and legitimate public interest considerations, including confidentiality, privacy, commercial sensitivity, legal privilege, security, procurement integrity and market-sensitive information and having regard to the resources available to GCDC.

4. LEGAL AND GOVERNANCE FRAMEWORK

4.1 GCDC will comply with all transparency and information governance requirements applicable to it, including, where relevant:

4.1.1 Freedom of Information Act 2000;

4.1.2 Environmental Information Regulations 2004;

4.1.3 Data Protection Act 2018 and UK GDPR;

4.1.4 Re-use of Public Sector Information Regulations 2015;

4.1.5 Procurement Act 2023 and related regulations and guidance;

4.1.6 Subsidy Control Act 2022;

4.1.7 applicable public records and records management requirements;

4.1.8 applicable sponsor department and framework document requirements;

4.1.9 applicable public body governance standards;

4.1.10 Bribery Act 2010;

4.1.11 applicable market abuse and insider dealing requirements; and

4.1.12 any further statutory or administrative requirements applying to GCDC's functions.

4.2 In applying this Policy, responding to information requests and making decisions relating to publication, disclosure, redaction or withholding of information, the General Counsel, the Data Protection Officer, the relevant information owner and any other person responsible for the relevant decision shall have regard to recognised public sector transparency standards and guidance, including:

4.2.1 the ICO model publication scheme and associated guidance;

4.2.2 the Local Government Transparency Code 2015, where relevant or adopted as best practice;

4.2.3 central government transparency publishing standards, where relevant;

4.2.4 best practice guidance applicable to arm's length bodies;

4.2.5 the Algorithmic Transparency Recording Standard, where relevant or adopted as best practice; and

4.2.6 guidance relating to the identification, management and disclosure of market sensitive or inside information.

The relevance of any particular standard or item of guidance will depend on the circumstances of the matter under consideration. The above list is illustrative and not exhaustive.

4.3 Although GCDC is not a local authority, it may adopt elements of local authority transparency practice where the Board considers that doing so supports openness, accountability and public confidence.

5. ADOPTION OF THE ICO MODEL PUBLICATION SCHEME

5.1 GCDC will adopt and maintain the Information Commissioner's approved model publication scheme and definition document for Non-Departmental Public Bodies.[1]

5.2 GCDC will maintain a public Guide to Information identifying the classes of information GCDC publishes or intends to publish, the specific information available within each class, where the information is published, the format in which it is available, how frequently it is updated, the accountable owner and whether any charge applies.

5.3 The Guide to Information is set out in Schedule 1.

5.4 GCDC will review the Guide to Information at least annually and whenever there is a material change to GCDC's functions, governance, structure, publication obligations or information holdings.

5.5 Where GCDC receives repeated requests for the same class of information, GCDC will consider whether that information should be added to the Guide to Information or otherwise published proactively.

6. PROACTIVE PUBLICATION COMMITMENTS

6.1 GCDC will proactively publish information falling within the following broad categories (subject to lawful redaction):

6.1.1 who GCDC is and what it does;

6.1.2 GCDC's governance, constitutional and legal framework;

6.1.3 GCDC's Board, committees, senior leadership and organisational structure;

6.1.4 GCDC's priorities, Strategic Vision, Corporate Plan, Business Plan and other Board-approved strategic documents;

6.1.5 GCDC's decision-making processes, including Board and committee papers, minutes and decisions;

6.1.6 GCDC's financial information, including budgets, annual reports, accounts, spending, grants, subsidies and contracts;

6.1.7 GCDC's procurement and contracting information;

6.1.8 GCDC's land, development, infrastructure and planning activities, subject to lawful restrictions;

6.1.9 GCDC's performance, risk and assurance information;

6.1.10 GCDC's policies and procedures;

6.1.11 public registers, including registers of interests and gifts and hospitality;

[1] model-publication-scheme.pdf

6.1.12 FOIA, EIR, complaints and transparency performance information;

6.1.13 data, digital and algorithmic transparency information; and

6.1.14 information about how members of the public, stakeholders and communities may engage with, contact, complain to or request information from GCDC.

6.2 Minimum publication commitments and frequencies are set out in Schedule 2.

7. GOVERNANCE AND DECISION-MAKING TRANSPARENCY

7.1 GCDC will conduct Board and committee business openly wherever reasonably practicable.

7.2 The conduct of Board meetings, including the holding of Open Meetings, public attendance rights, notice requirements, access to papers and the exclusion of members of the public where confidential or Exempt Information is to be considered, shall be governed by the GCDC's Board Terms of Reference and applicable legislation. Nothing in this Policy confers any right on members of the public to participate in meetings or to attend meetings other than in accordance with the Board Terms of Reference.

7.3 GCDC will publish:

7.3.1 the terms of reference and meeting dates of the Board and each Committee established by the Board;

7.3.2 the agenda and Papers for each Open Meeting in advance of the Open Meeting and in accordance with the Board Terms of Reference;

7.3.3 the agenda for each Board and Committee meeting that is not an Open Meeting as soon as reasonably practicable after the meeting has taken place;

7.3.4 the approved minutes of each Board and Committee meeting as soon as reasonably practicable after their approval, whether the minutes are approved at an Open Meeting or at another meeting;

7.3.5 such non-confidential Papers relating to Board and Committee meetings that are not Open Meetings as GCDC determines should be published, having regard to the nature of the matter under consideration, the public interest in publication and any confidentiality, commercial, legal or governance considerations;

7.3.6 decision records for significant decisions; and

7.3.7 a Forward Plan of significant decisions.

References in this paragraph to Committees are to Committees of GCDC and do not include committees or governing bodies of any subsidiary.

7.4 Where a document contains information that cannot lawfully or properly be published, GCDC shall, wherever reasonably practicable, publish the document with that information redacted. GCDC may withhold the document, or the relevant part of it, where redaction would not adequately protect that information or would render the published document materially misleading or unintelligible.

7.5 For the purposes of this Policy, references to confidential, exempt, restricted or protected information include any "Exempt Information" identified in the GCDC's Board Terms of Reference. This Policy should be interpreted consistently with the Board Terms of Reference and does not limit any right or obligation to withhold information where disclosure would be prohibited or restricted by law.

7.6 GCDC will classify Board and committee papers in accordance with Schedule 3.

7.7 Where information is redacted or a document is withheld, GCDC will record the reason. Where the sensitivity is expected to be temporary, GCDC may also record a date or event for reviewing whether the information can subsequently be published.

A review date or event is not required where there is no reasonable prospect that the basis for redaction or withholding will cease to apply.

7.8 GCDC will avoid unnecessary use of confidential or private Board sessions. The fact that information is inconvenient, contentious or reputationally sensitive will not of itself justify withholding.

8. FINANCIAL, PROCUREMENT, CONTRACT AND SUBSIDY TRANSPARENCY

8.1 GCDC will publish clear information about how public money is allocated, committed and spent.

8.2 GCDC will publish, subject to lawful redaction, annual report and accounts, budget information, expenditure data, procurement pipelines, tender and contract award information, a contracts register, grant and subsidy information, senior remuneration information, Board remuneration and expenses information, prompt payment performance where applicable, and other financial transparency information required by law, sponsor guidance, framework document or adopted best practice.

8.3 GCDC will comply with applicable procurement transparency requirements under the Procurement Act 2023, the Procurement Regulations 2024 and the Central Digital Platform / Find a Tender requirements.

8.4 Subject to the publication threshold approved by the Board from time to time, GCDC will publish procurement and contract information beyond the minimum required by law where this is proportionate and supports transparency in the use of public money. This may include lower-value procurement opportunities and awards, the contracts register and procurement pipeline information.

8.5 GCDC will publish subsidy and grant information in accordance with the Subsidy Control Act 2022 and any applicable transparency database requirements.

8.6 GCDC will not publish procurement or commercial information where disclosure would prejudice competition, undermine value for money, compromise negotiations, breach confidentiality, create an unfair advantage, or otherwise prejudice GCDC's

or a third party's legitimate, commercial interests. Where such information is withheld, GCDC will consider whether it can publish a summary, redacted version or later disclosure once sensitivity has passed.

9. LAND, DEVELOPMENT, INFRASTRUCTURE AND PLANNING TRANSPARENCY

9.1 GCDC recognises that transparency is particularly important in relation to land, development, infrastructure, planning, housing, investment, viability, funding and delivery activities.

9.2 Subject to lawful restrictions, GCDC will publish information contained in its approved corporate documents, Board and Committee Papers, minutes, decision records, statutory registers and other existing records concerning:

9.2.1 its strategic objectives and development priorities;

9.2.2 development strategies, infrastructure plans and masterplans;

9.2.3 planning functions, policies, applications, decisions and registers;

9.2.4 major projects, public funding commitments and delivery arrangements;

9.2.5 land and asset information;

9.2.6 development partner selection, procurement routes and contract awards;

9.2.7 consultation and engagement;

9.2.8 key performance indicators and delivery milestones; and

9.2.9 material changes to approved plans or programmes.

This commitment concerns the publication of information held by GCDC and does not require GCDC to create a separate document solely for publication under this Policy.

9.3 GCDC will not publish land, development, viability, negotiation, acquisition, disposal or commercial information where publication would prejudice GCDC's ability to secure value for money, compromise commercial negotiations, prejudice a third party's legitimate interests, disclose legally privileged advice, breach confidence, disclose personal data unlawfully, create market-sensitive information risks, or otherwise be contrary to the public interest.

9.4 Where information is withheld because sensitivity is time-limited, GCDC will consider publication once the relevant sensitivity has passed.

10. FOIA, EIR AND INFORMATION REQUEST HANDLING

10.1 GCDC will maintain clear arrangements for receiving and responding to requests for information under FOIA and EIR.

10.2 GCDC will publish on its website how to make an FOIA request, how to make an EIR request, contact details for information requests, how GCDC handles requests, how to request an internal review and how to complain to the Information Commissioner.

10.3 GCDC will ordinarily respond to FOIA and EIR requests within the applicable statutory timeframe.

10.4 GCDC will provide reasonable advice and assistance to applicants, including where a request is unclear, too broad or would exceed applicable cost limits.

10.5 GCDC will maintain records of information requests, including reference number, date received, statutory regime, responsible officer, response deadline, outcome, exemptions or exceptions relied upon, internal review, Information Commissioner involvement and lessons learned or proactive publication action arising from the request having regard to the nature and volume of requests received and available resources.

10.6 GCDC will maintain and publish a disclosure log for FOIA and EIR responses where there is wider public interest in the information disclosed, subject to the removal of personal data, confidential information and other material that should not be published.

10.7 GCDC will report FOIA and EIR performance to the Audit and Risk Assurance Committee at least annually. The report should include request volumes, timeliness, internal reviews, complaints, common request themes and proactive publication improvements to the extent reasonably practicable having regard to GCDC's size, staffing and operational resources at the time of reporting.

11. RESTRICTIONS ON PUBLICATION AND DISCLOSURE

11.1 GCDC will withhold information only where there is a lawful basis for doing so.

11.2 Information may be withheld, redacted or deferred where disclosure would or may disclose personal data unlawfully, breach confidence, prejudice commercial interests, prejudice procurement or contract negotiations, disclose legally privileged information, prejudice policy formulation or safe space for internal deliberation, undermine security or public safety, prejudice investigations, audit or enforcement activity, disclose market-sensitive or inside information, breach statutory restrictions, prejudice third-party rights or legitimate interests, be contrary to applicable FOIA or EIR exemptions or exceptions, or otherwise be contrary to the public interest.

11.3 Where an exemption or exception is subject to a public interest test, GCDC will apply that test carefully and record the reasons for its decision.

11.4 Where only part of a document is exempt or confidential, GCDC will consider whether the remainder can be disclosed.

11.5 Where information is withheld, GCDC will explain the basis for withholding so far as it is lawful and appropriate to do so.

11.6 GCDC will maintain an exceptions log for significant decisions not to publish information that would otherwise fall within this Policy, with the exception of FOIA and EIR requests where detailed decisions not to publish are held within case files.

12. MARKET-SENSITIVE INFORMATION AND INSIDE INFORMATION

12.1 This section establishes GCDC's overarching requirements for the identification, control and disclosure of market-sensitive information and inside information. GCDC may maintain separate operational guidance explaining reporting routes, escalation procedures, document controls and practical responsibilities. Any such guidance shall support, and shall not displace, this Policy.

12.2 GCDC may, through its land, development, infrastructure, procurement, investment, planning, funding or commercial activities, receive or create confidential, non-public and valuable information.

12.3 Such information may be capable of affecting financial markets, the price or value of financial instruments, property values, investment decisions, listed company securities, credit instruments, procurement outcomes, land transactions or counterparties' commercial positions.

12.4 GCDC will maintain appropriate controls for identifying, managing and disclosing market-sensitive information and, where relevant, inside information.

12.5 Board members, committee members, staff and advisers must treat potentially market-sensitive information with care, restrict access to those with a legitimate need to know, avoid selective disclosure, not use confidential or market-sensitive information for personal advantage or to benefit another person, comply with applicable law and GCDC protocols, report concerns about inappropriate disclosure immediately, and seek legal or governance advice where doubt arises.

12.6 Where information may constitute inside information or may create market abuse risk, GCDC will escalate the matter to the General Counsel, seek legal advice where appropriate, restrict circulation, maintain a restricted access or insider list where appropriate, mark relevant documents appropriately, consider whether disclosure should be delayed, controlled or made through a formal route, assess FOIA / EIR requests involving the information with particular care, and record the decision-making process.

12.7 GCDC will not use transparency obligations as a reason to make uncontrolled disclosure of market-sensitive information. Equally, GCDC will not withhold information merely because it is difficult, contentious or inconvenient. Decisions will be taken by reference to law, guidance, public interest and GCDC's governance protocols.

13. CONFLICTS OF INTEREST AND DECLARATIONS

13.1 GCDC will maintain robust arrangements for identifying, declaring, recording, managing and publishing interests.

13.2 All Board members, committee members, designated officers, and staff must declare relevant interests on appointment, annually, whenever a new interest arises, and at the start of any meeting where an agenda item may relate to an interest.

13.3 Relevant interests may include employment, office, trade, profession or vocation; directorships; shareholdings or other financial interests; land, property or development interests; significant contracts or business relationships; roles with developers, landowners, investors, contractors, consultants or representative bodies; political, charitable, community or other roles relevant to GCDC business; family or close personal relationships that may give rise to an actual or perceived conflict; and any other matter that could reasonably be regarded as affecting impartiality.

13.4 GCDC will maintain and publish a Board Register of Interests, a committee member Register of Interests, senior officer interest information where appropriate, and meeting-specific declarations recorded in minutes.

13.5 Where a person has an actual or perceived conflict of interest, GCDC will determine the appropriate management action. This may include recording the interest only, allowing participation but not decision-making, requiring withdrawal from discussion and decision, restricting access to papers, excluding the person from related communications, or taking any other action necessary to protect integrity and public confidence.

13.6 Failure to declare an interest may be treated as a governance breach and may be reported to the Chair, Chief Executive, General Counsel, Monitoring Officer equivalent, sponsor department or Audit and Risk Assurance Committee as appropriate.

14. GIFTS AND HOSPITALITY

14.1 This section establishes GCDC's overarching requirements relating to gifts and hospitality and applies to Board members, Committee members, staff, secondees, contractors and advisers. GCDC shall maintain operational guidance explaining the process for seeking approval, making declarations and maintaining the Gifts and Hospitality Register.

14.2 Gifts and hospitality must not influence, or appear to influence, GCDC decisions.

14.3 Gifts and hospitality should not be treated as part of usual business. Acceptance should be infrequent, modest, justifiable and capable of public scrutiny.

14.4 Offers of gifts, hospitality or benefits must normally be refused where they are connected with live procurement, planning decisions, land acquisition or disposal, development agreements, funding decisions, grant or subsidy awards, contract negotiations, regulatory or enforcement matters, lobbying activity, or any matter where acceptance could reasonably be perceived as compromising integrity.

14.5 Any gift or hospitality with an estimated value of [£50] or more must be declared within 28 days, including the recipient, provider, nature of the gift or hospitality, date offered and date received, estimated value, whether accepted, declined, returned or donated, reason for acceptance or refusal, and approval obtained.

14.6 Gifts or hospitality below [£50] must still be declared where they could reasonably be perceived as influencing, or seeking to influence, GCDC business.

14.7 Staff must obtain prior approval before accepting hospitality, and where practicable before accepting any gift. Hospitality or gifts offered by developers, landowners, contractors, bidders, investors, lobbyists or advisers should be treated with particular caution.

14.8 GCDC will maintain a Gifts and Hospitality Register covering accepted, declined, returned and donated offers.

14.9 GCDC will publish the Gifts and Hospitality Register quarterly. If quarterly publication is not reasonably practicable, the General Counsel shall record the reason in the Exceptions Log and arrange publication as soon as reasonably practicable.

14.10 The Audit and Risk Assurance Committee will review the Gifts and Hospitality Register at least annually to identify patterns, risks or required improvements.

15. WORKFORCE AND REMUNERATION TRANSPARENCY

15.1 GCDC will publish information about its senior structure and accountability arrangements.

15.2 Subject to applicable legal requirements and data protection obligations, GCDC will publish:

15.2.1 its organisational structure;

15.2.2 Board membership and biographies;

15.2.3 senior leadership roles and responsibilities;

15.2.4 senior remuneration information;

15.2.5 Board remuneration and expenses;

15.2.6 pay multiple or equivalent remuneration information, where applicable;

15.2.7 gender pay gap information, where applicable;

15.2.8 appropriate equality, diversity and inclusion information; and

15.2.9 any other workforce information required by law, sponsor department guidance or adopted best practice.

The nature and level of detail published shall be proportionate to GCDC's size, resources and legal obligations.

15.3 GCDC will not routinely publish the names, personal contact details or other personal information of staff. Such information may be published where publication is required by law or is otherwise lawful, necessary and proportionate having regard to the individual's role and the public interest in disclosure. GCDC will publish appropriate corporate contact details to enable members of the public and stakeholders to contact relevant functions

16. DATA PROTECTION, RECORDS MANAGEMENT, ACCESSIBILITY AND OPEN DATA

16.1 GCDC will manage information so that it can be located, understood, retained, disclosed, redacted, archived or deleted in accordance with law and good records management practice.

16.2 GCDC will maintain appropriate records management procedures, retention and disposal schedules, information asset ownership arrangements, data protection impact assessment processes, privacy notices, information security arrangements and records of processing activity where required.

16.3 Proactive publication must comply with UK GDPR and the Data Protection Act 2018.

16.4 GCDC will publish information in formats that are open, searchable, accessible and capable of re-use wherever reasonably practicable. GCDC will also consider whether an alternative format or means of access is reasonably required where a person cannot access information or an online communication through the standard publication route.

16.5 Datasets should, where appropriate (having regard to available resources, the nature of the dataset and the proportionality of the requirement), be published in machine-readable formats, be accompanied by metadata explaining date, scope, owner and limitations, be version-controlled, identify the date of publication and date of next review, be published under the Open Government Licence or another appropriate licensing statement, and be accessible to users of assistive technology.

16.6 GCDC will maintain an archive or clear route to previous versions of key documents where appropriate and having regard to available resources and records management capacity.

17. DATA, DIGITAL AND ALGORITHMIC TRANSPARENCY

17.1 GCDC will be transparent about significant use of data analytics, algorithmic tools and AI-enabled systems in its operations and decision-making.

17.2 Where GCDC uses an algorithmic or AI-enabled tool to support a decision having a significant effect on individuals, communities, land, funding, planning, eligibility, enforcement, prioritisation or public services, GCDC will consider whether the tool is in scope of the Algorithmic Transparency Recording Standard, whether a public ATRS record or equivalent transparency statement should be published, whether a data protection impact assessment is required, whether an equality impact assessment or public law risk review is appropriate, whether the system has adequate human oversight, whether affected persons can obtain a meaningful explanation of decisions, and whether safeguards are sufficient to manage bias, error, discrimination, unfairness, opacity and accountability risks. The specified areas are intended to identify the principal categories of decisions requiring assessment and do not exclude assessment of another use that may have a significant effect.

17.3 Where GCDC is within scope of mandatory ATRS requirements, it will comply with those requirements. Where GCDC is not formally within scope, it will apply the ATRS as best practice unless there is a lawful, proportionate and documented reason not to do so.

17.4 Human accountability for GCDC decisions will always be maintained. GCDC will not treat an automated or algorithmic output as determinative without appropriate human review where the decision has significant consequences.

18. COMPLAINTS, WHISTLEBLOWING AND PUBLIC FEEDBACK

18.1 GCDC will publish a clear Complaints Procedure explaining who may complain, how complaints may be submitted, how complaints will be assessed, expected response stages, escalation routes and any relevant external review or oversight route.

18.2 GCDC will publish annual complaints information, subject to data protection and confidentiality, including complaint volumes, themes and learning points where appropriate.

18.3 GCDC will maintain a Whistleblowing Policy to enable concerns about wrongdoing, fraud, corruption, misconduct, health and safety, legal breach, environmental harm, improper disclosure, conflicts of interest or misuse of public funds to be raised safely.

18.4 GCDC will publish information explaining how concerns may be raised and how GCDC responds to them, while protecting confidentiality and whistleblower protections.

18.5 GCDC will provide routes for public feedback and stakeholder engagement, including in relation to strategic plans, consultations, development proposals, planning matters and community impact, where relevant.

19. ROLES, RESPONSIBILITIES AND ESCALATION

19.1 The Board is responsible for approving this Policy and setting the tone for transparency, openness and accountability.

19.2 The Audit and Risk Assurance Committee is responsible for overseeing compliance with this Policy, reviewing transparency risks and receiving regular assurance reports.

19.3 The General Counsel is the executive owner of this Policy and is responsible for:

19.3.1 maintaining and interpreting this Policy;

19.3.2 overseeing the publication scheme and Guide to Information;

19.3.3 overseeing FOIA and EIR governance;

19.3.4 establishing and maintaining the registers, logs and governance controls required by this Policy;

19.3.5 advising on confidentiality, legal privilege, data protection, market-sensitive information and disclosure risk;

19.3.6 coordinating the Legal Secretariat and other operational support required to implement this Policy; and

19.3.7 reporting material matters to the Audit and Risk Assurance Committee.

19.4 The Chief Executive is responsible for ensuring that GCDC's executive team implements this Policy across GCDC. The Chief Executive shall ensure that the General Counsel and each accountable owner have access to the resources and information reasonably required to discharge their responsibilities under this Policy.

19.5 Executive Directors and functional leads are responsible for ensuring that information within their areas is accurate, current, appropriately classified and published in accordance with this Policy.

19.6 Information owners are responsible for identifying, maintaining, updating and reviewing information falling within the Guide to Information.

19.7 All Board members, committee members, staff, secondees, contractors, consultants and advisers must comply with this Policy and must raise concerns where they become aware of potential non-compliance.

19.8 Material breaches, repeated failures or high-risk disclosure issues must be escalated to the General Counsel and, where appropriate, to the Chief Executive, Chair, Audit and Risk Assurance Committee, sponsor department, Information Commissioner or other relevant authority.

20. MONITORING, ASSURANCE AND ANNUAL TRANSPARENCY REPORT

20.1 GCDC will monitor compliance with this Policy through maintenance of the Guide to Information, publication schedule tracking, FOIA and EIR performance monitoring, disclosure log review, exceptions log review, register of interests review, gifts and hospitality register review, procurement and contract transparency review, data, digital and algorithmic transparency review, complaints and whistleblowing trend review, internal audit or assurance review where appropriate, and annual reporting to the Audit and Risk Assurance Committee and Board. GCDC will prioritise monitoring activities having regard to available resources, risk assessment, and the relative significance of each obligation. The frequency and depth of each monitoring activity will be determined by the General Counsel in consultation with the Audit and Risk Assurance Committee.

20.2 GCDC will publish an annual Transparency Report covering publication scheme compliance, changes to the Guide to Information, FOIA and EIR request volumes and performance, internal reviews and Information Commissioner complaints, use of exemptions and exceptions, disclosure log activity, Board and committee publication performance, register of interests compliance, gifts and hospitality declarations, procurement and contract transparency, subsidy and grant publication, complaints information, data, digital and algorithmic transparency records, market-sensitive information governance issues where disclosable, transparency breaches or improvement actions, and priorities for the following year. GCDC will produce the Annual Transparency Report having regard to available resources, and may present information at a level of detail proportionate to the significance of the issues arising in the relevant reporting period. Where a topic has generated no material issues, GCDC may note this briefly rather than providing detailed analysis.

20.3 GCDC will consider whether transparency performance should be included in its annual report and accounts.

21. REVIEW

21.1 This Policy will be reviewed at least annually.

21.2 The review will consider legislative change, sponsor department requirements, Information Commissioner guidance, procurement transparency developments, public body governance standards, internal audit or assurance findings, FOIA / EIR performance, complaints and stakeholder feedback, technology, data and AI developments, market-sensitive information risks, and experience of operating the publication scheme.

21.3 Material amendments to this Policy require Board approval.

21.4 The General Counsel may make minor administrative updates, such as correcting links, job titles, document names and publication routes, provided the substantive obligations in the Policy are not changed.

SCHEDULE 1 - GUIDE TO INFORMATION

This Guide supports GCDC's adoption of the Information Commissioner's approved model publication scheme. Information published online will ordinarily be free of charge. Where information is available in hard copy, GCDC may charge reasonable disbursement costs where permitted by law and where the charge is published in advance. The exact information to be published in each class detailed below is defined in the Information Commissioner's model publication scheme for Non-Departmental Public Bodies.

ICO class	Information GCDC will publish	Publication route	Format	Frequency	Owner	Charge
Who we are and what we do	Establishment Order or enabling legislation	Website governance page	HTML / PDF	On adoption and on change	General Counsel	Free online
Who we are and what we do	Framework Document or sponsor agreement	Website governance page	HTML / PDF	On adoption and on change	General Counsel	Free online
Who we are and what we do	Standing Orders and Scheme of Delegation	Website governance page	HTML / PDF	On adoption and on change	General Counsel	Free online
Who we are and what we do	Board and committee terms of reference	Website governance page	HTML / PDF	On adoption and on change	General Counsel	Free online
Who we are and what we do	Board membership, biographies and roles	Website governance page	HTML	On appointment and on change	GCDC Legal Secretariat	Free online
Who we are and what we do	Senior leadership structure and organisational chart	Website / annual report	HTML / PDF	On change and annually	Chief Executive / HR Lead	Free online
What we spend and how we spend it	Annual report and accounts	Website / relevant reporting route	HTML / PDF	Annually	Finance Director	Free online
What we spend and how we spend it	Budget summary and spend data	Website transparency page	CSV / HTML / PDF	Annually / quarterly where practicable	Finance Director	Free online
What we spend and how we spend it	Procurement pipeline, tender opportunities and contract awards	Central Digital Platform / Find a Tender and/or GCDC website	HTML / CSV	In accordance with procurement law and policy	Commercial Lead	Free online
What we spend and how we spend it	Contracts register	Website procurement page	CSV / HTML	Quarterly, subject to the Board approved publication threshold	Commercial Lead	Free online
What we spend and how we spend it	Grant and subsidy information	Website / subsidy database where applicable	HTML / CSV	In accordance with law and at least annually	Finance Director / Programme Lead	Free online
What we spend and how we spend it	Senior remuneration and Board remuneration / expenses	Annual report / website	PDF / HTML	Annually	HR Lead / Finance Director / General Counsel	Free online
What our priorities are and how we are doing	Strategic Vision, Corporate Plan, and Business Plan	Website	HTML / PDF	On adoption / annually / on material change	Chief Executive / Programme Director	Free online

What our priorities are and how we are doing	Performance indicators and strategic risk summary	Website / Board papers / annual report	HTML / PDF / CSV	Quarterly or annually as determined by Board	Performance Lead / Risk Lead	Free online
How we make decisions	Board and Committee meeting dates, Open Meeting agendas and public Papers, and agendas for other Board and Committee meetings	Website	HTML / PDF	Publish meeting dates annually and update on change. Publish Open Meeting agendas and public Papers in advance of the meeting. Publish agendas for other Board and Committee meetings as soon as reasonably practicable after the meeting.	GCDC Legal Secretariat	Free online
How we make decisions	Approved minutes, decision records and Forward Plan	Website	HTML / PDF	Publish minutes as soon as reasonably practicable after approval. Publish significant decision records following the decision, subject to this Policy. Publish the Forward Plan quarterly or at another frequency approved by the Board.	GCDC Legal Secretariat	Free online
How we make decisions	Consultation documents and outcomes	Website / consultation portal	HTML / PDF	During and following consultation	Programme Lead	Free online
Policies and procedures	Transparency Policy, Code of Conduct, interests, gifts, complaints, whistleblowing, procurement and privacy materials	Website governance page	HTML / PDF	On approval and review	General Counsel	Free online
Lists and registers	Board, committee and senior officer interests	Website governance page	HTML / PDF	On appointment, on change and at least annually	GCDC Legal Secretariat	Free online
Lists and registers	Gifts and Hospitality Register	Website governance page	CSV / HTML / PDF	Quarterly	GCDC Legal Secretariat	Free online
Lists and registers	Contracts Register and land / asset information where publishable	Website procurement or transparency page	CSV / HTML / PDF	Quarterly / annually as applicable	Commercial / Property / Finance Lead	Free online
Services provided	Contact details, planning service information, funding or grant programmes, engagement routes and complaints routes	Website	HTML / PDF	On change / during relevant programme	Commercial / Property / Finance Lead / Communications / Planning / Programme / Complaints Lead	Free online

SCHEDULE 2 - PUBLICATION SCHEDULE

This Schedule sets minimum publication expectations. GCDC may publish more frequently where appropriate. Publication may be deferred, redacted or withheld where justified under this Policy.

Information	Publication standard	Responsible owner
Establishment Order / enabling legislation	Publish on adoption and update on change	General Counsel
Framework Document / sponsor agreement	Publish on adoption and update on change	General Counsel
Standing Orders and Scheme of Delegation	Publish on adoption and update on change	General Counsel
Board and committee terms of reference	Publish on adoption and update on change	GCDC Legal Secretariat
Board biographies and membership	Publish on appointment and update on change	GCDC Legal Secretariat
Senior leadership structure	Publish on change and review annually	HR Lead
Board meeting calendar	Publish annually and update on change	GCDC Legal Secretariat
Open Meeting agendas and public Papers	Publish at least five clear Working Days before the Open Meeting in accordance with the Board Terms of Reference	GCDC Legal Secretariat
Agendas for Board and Committee meetings that are not Open Meetings	Publish as soon as reasonably practicable after the meeting has taken place	GCDC Legal Secretariat
Approved Board and Committee minutes	Publish as soon as reasonably practicable after approval, whether approval takes place at an Open Meeting or another meeting	GCDC Legal Secretariat
Decision notices	Publish following significant decisions, subject to review and redaction	General Counsel
Forward Plan	Publish quarterly, or at another Board-approved frequency	GCDC Legal Secretariat
Annual report and accounts	Publish annually	Finance Director
Budget summary	Publish annually and on material change	Finance Director
Spend data	Publish quarterly where operationally practicable	Finance Director
Procurement pipeline	Publish quarterly where appropriate	Commercial Lead
Tender opportunities and contract awards	Publish in accordance with procurement law and policy	Commercial Lead
Contracts register	Publish quarterly where operationally practicable	Commercial Lead
Grants and subsidies	Publish in accordance with legal requirements and at least annually where applicable	Finance / Programme Lead
Corporate Plan	Publish on adoption and review	Chief Executive
Business Plan	Publish annually	Chief Executive
Performance indicators	Publish quarterly or annually, as determined by Board	Performance Lead
Strategic risk summary	Publish annually, subject to redaction	Risk Lead
Register of Interests	Publish on appointment, on change and annually	GCDC Legal Secretariat

Gifts and Hospitality Register	Publish quarterly	Finance Director
FOIA / EIR contact information	Publish and update on change	General Counsel
Disclosure log	Update periodically, subject to redaction	General Counsel
FOIA / EIR annual performance	Publish quarterly	General Counsel
Complaints Procedure and annual complaints information	Publish and update annually / on change, subject to confidentiality	Complaints Lead
Transparency Report	Publish annually	General Counsel
AI / algorithmic transparency records	Publish when qualifying tools are adopted or materially changed	Digital / Data Lead (in conjunction with General Counsel)
Publication scheme review	Review annually	General Counsel

SCHEDULE 3 - BOARD AND COMMITTEE PAPER CLASSIFICATION PROTOCOL

This Protocol governs the classification of Board and committee papers for transparency and publication purposes. It is intended to ensure that GCDC publishes Board and committee information wherever appropriate, while protecting information that must lawfully or properly remain confidential.

Classification	Description	Publication approach
Part 1: Public	Paper can be published without redaction.	Publish in accordance with the governance and decision-making transparency provisions of this Policy. Papers for an Open Meeting shall be published in advance. Papers for other meetings shall be published only where GCDC determines that publication is appropriate.
Part 1A: Public with redactions	Most of the paper can be published but specific parts must be withheld.	Where the relevant Paper is to be published under this Policy, publish a redacted version and indicate the general basis for the redaction where appropriate.
Part 2: Confidential	Paper cannot be published without causing prejudice, breaching legal obligations or disclosing protected information.	Do not publish unless and until confidentiality falls away or a redacted version is possible.
Part 2M: Market Sensitive / Inside Information	Paper may affect financial markets, financial instruments, investment decisions, property values, listed entities, land transactions or market participants.	Restricted circulation and legal / governance review where appropriate.
Part 2L: Legally Privileged	Paper contains or reveals legal advice, litigation advice or privileged communications.	Restricted circulation. Do not publish without legal clearance.

Code	Reason	Code	Reason
C1	Personal data	C7	Market-sensitive / inside information
C2	Commercial sensitivity	C8	Confidential third-party information
C3	Procurement sensitivity	C9	Policy formulation / internal deliberation
C4	Land acquisition / disposal sensitivity	C10	Audit, investigation or enforcement sensitivity
C5	Legal privilege	C11	Statutory restriction
C6	Security / public safety	C12	Other lawful reason, to be specified

The author of a Board or committee paper must propose a classification. The Board Secretary / Governance Team must review the classification. The General Counsel must review papers classified as Part 2M, Part 2L, or any paper involving significant disclosure risk. Information shall remain confidential only for so long as there is a continuing lawful or proper basis for maintaining confidentiality. A review date or event need only be recorded where the relevant sensitivity is reasonably expected to end.

This Classification Protocol governs the classification, redaction, withholding and publication of Board and Committee Papers. The Board Terms of Reference govern the conduct of Meetings, public attendance and the exclusion of the public. The two documents shall be interpreted consistently. If there is any inconsistency concerning the classification or publication of information, this Policy shall prevail. If there is any inconsistency concerning the conduct of a Meeting, the Board Terms of Reference shall prevail.

SCHEDULE 4 - TRANSPARENCY COMPLIANCE CHECKLIST

Area	Assurance question	Owner	Status	Action required
Publication Scheme	Has GCDC adopted and maintained the ICO model publication scheme?	General Counsel	[●]	[●]
Guide to Information	Has the Guide to Information been reviewed and updated?	General Counsel	[●]	[●]
Publication Schedule	Are publication commitments being met?	General Counsel	[●]	[●]
Board papers	Are agendas, papers and minutes published in accordance with the classification protocol?	GCDC Legal Secretariat	[●]	[●]
Confidential papers	Are Part 2 classifications justified and, where confidentiality is expected to be temporary, reviewed at the appropriate time?	GCDC Legal Secretariat and General Counsel	[●]	[●]
FOIA / EIR	Are requests answered within statutory timeframes?	FOI Officer	[●]	[●]
Disclosure log	Is the disclosure log maintained and published appropriately?	General Counsel	[●]	[●]
Exceptions log	Are decisions not to publish recorded and justified?	General Counsel	[●]	[●]
Register of Interests	Are interests declared, updated and published?	GCDC Legal Secretariat	[●]	[●]
Gifts and Hospitality	Is the register complete, reviewed and published?	General Counsel	[●]	[●]
Procurement	Are opportunities, awards and contracts published as required?	Commercial Lead	[●]	[●]
Subsidies and grants	Are subsidies and grants published where required?	Finance / Programme Lead	[●]	[●]
Spend data	Is spend data published in accordance with the schedule?	Finance Director	[●]	[●]
Land and development	Is publishable land, development and project information available?	Property / Programme Lead	[●]	[●]
Market-sensitive information	Are inside information and market-sensitive risks identified and controlled?	General Counsel	[●]	[●]
AI / algorithms	Are qualifying algorithmic tools assessed and recorded?	Digital / Data Lead	[●]	[●]
Accessibility	Is information published in accessible and reusable formats where practicable, and are reasonable alternative arrangements considered where a person cannot access an Open Meeting livestream or other online communication?	Communications / Digital Lead	[●]	[●]
Annual Transparency Report	Has an annual Transparency Report been prepared and published?	General Counsel	[●]	[●]

SCHEDULE 5 - DISCLOSURE LOG PROTOCOL

GCDC will maintain a disclosure log to support proactive publication, reduce repeat requests and improve public access to information.

GCDC will publish FOIA and EIR responses on the disclosure log where the information disclosed is likely to be of wider public interest or may assist in reducing repeated requests. Before publication, GCDC shall remove information identifying the applicant and any other information that should not lawfully or properly be published.

The FOI Officer is responsible for maintaining the disclosure log under the oversight of the General Counsel.

SCHEDULE 6 - EXCEPTIONS LOG

The Exceptions Log records significant decisions not to publish information that would otherwise fall within this Policy.

Matter to record	Detail
Information not published	Description of information withheld or deferred
Publication commitment affected	Relevant policy clause or schedule item
Reason for non-publication	Legal, policy or public interest reason
Decision-maker	Name / role approving non-publication
Date of decision	Date decision was made
Review date or trigger, where applicable	When confidentiality will be reconsidered if the sensitivity is expected to be temporary
Partial publication considered	Whether redaction or summary was considered
Escalation	Whether Audit and Risk Assurance Committee consideration is needed

The Exceptions Log should be reviewed at least annually by the General Counsel and reported to the Audit and Risk Assurance Committee. Where information can be published following the expiry of sensitivity, GCDC should publish it as soon as reasonably practicable.

SCHEDULE 7

ANNUAL TRANSPARENCY REPORT TEMPLATE

1. **INTRODUCTION**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

2. **PUBLICATION SCHEME AND GUIDE TO INFORMATION**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

3. **PUBLICATION SCHEDULE PERFORMANCE**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

4. **FOIA AND EIR PERFORMANCE**

4.1 number of FOIA and EIR requests received;

4.2 percentage responded to within statutory deadline;

4.3 number of internal reviews and Information Commissioner complaints;

4.4 common request themes;

4.5 exemptions and exceptions most frequently relied upon; and

4.6 proactive publication improvements arising from requests.

5. **DISCLOSURE LOG**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

6. **BOARD AND COMMITTEE TRANSPARENCY**

6.1 number of public meetings;

6.2 publication of agendas, papers and minutes;

6.3 number of confidential / Part 2 papers;

6.4 common reasons for confidentiality; and

6.5 review of confidential papers for later publication.

7. **INTERESTS, GIFTS AND HOSPITALITY**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

8. **FINANCIAL, PROCUREMENT AND CONTRACT TRANSPARENCY**

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

9. LAND, DEVELOPMENT, INFRASTRUCTURE AND PLANNING TRANSPARENCY

To include proportionate reporting on information published concerning approved strategies and plans, major projects, planning functions and decisions, land and asset information, public funding commitments, development partner selection, consultation and engagement, performance indicators and material changes to approved programmes. The report should identify any significant information withheld or deferred and the general reason for doing so.

10. DATA, DIGITAL AND AI TRANSPARENCY

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

11. MARKET SENSITIVE INFORMATION

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

12. COMPLAINTS AND FEEDBACK

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

13. BREACHES, ISSUES AND REMEDIAL ACTIONS

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

14. PRIORITIES FOR NEXT YEAR

To be completed annually with relevant narrative, data, issues, learning points and improvement actions.

SCHEDULE 8 - ROLES AND RESPONSIBILITIES MATRIX

Area	Executive owner	Operational owner	Board oversight
Transparency Policy	General Counsel	GCDC Legal team	Board / Audit and Risk Assurance Committee
Publication Scheme and Guide to Information	General Counsel	GCDC Legal Secretariat	Audit and Risk Assurance Committee
FOIA / EIR	General Counsel	FOI Officer	Audit and Risk Assurance Committee
Disclosure Log	General Counsel	FOI Officer	Audit and Risk Assurance Committee
Exceptions Log	General Counsel	GCDC Legal Secretariat	Audit and Risk Assurance Committee
Board papers	Chair and Chief Executive	GCDC Legal Secretariat	Board
Financial transparency	Finance Director	Finance Team	Audit and Risk Assurance Committee
Procurement transparency	Finance Director	Procurement Team	Audit and Risk Assurance Committee
Contracts register	General Counsel	Procurement Team	Audit and Risk Assurance Committee
Grants and subsidies	Finance Director	Programme Team	Audit and Risk Assurance Committee
Land and asset transparency	Property / Development Director	Property Team	Board / Audit and Risk Assurance Committee
Planning transparency	Planning Director / Lead	Planning Team	Board / relevant committee
Register of Interests	General Counsel	GCDC Legal Secretariat	Chair / Audit and Risk Assurance Committee
Gifts and Hospitality	Finance Director	Finance Director	Audit and Risk Assurance Committee
Complaints and whistleblowing	Chief Executive and General Counsel	GCDC Legal team	Audit and Risk Assurance Committee
Records management and data protection	General Counsel and DPO or Data Lead	Information Governance Team	Audit and Risk Assurance Committee
Open data and accessibility	Digital / Communications Lead	Digital Team	Executive Team
AI / algorithmic transparency	Digital / Data Lead	System Owner	Audit and Risk Assurance Committee
Market-sensitive information	General Counsel	GCDC Legal team	Chair / Audit and Risk Assurance Committee
Annual Transparency Report	General Counsel	GCDC Legal Secretariat	Board / Audit and Risk Assurance Committee

SCHEDULE 9 - MARKET SENSITIVE INFORMATION ESCALATION CHECKLIST

1. **INITIAL ASSESSMENT QUESTIONS**

1.1 Is the information confidential?

1.2 Is the information non-public?

1.3 Is the information specific or precise?

1.4 Could the information affect financial instruments, listed securities, debt, investment decisions, property values or market behaviour?

1.5 Does the information relate to a listed company, investor, lender, developer, contractor or other market participant?

1.6 Does the information relate to a major land transaction, acquisition, disposal, procurement, funding decision or development agreement?

1.7 Could selective disclosure give someone an unfair advantage?

1.8 Could disclosure prejudice GCDC's commercial position?

1.9 Could disclosure create insider dealing, unlawful disclosure or market manipulation risk?

1.10 Has legal or governance advice been obtained?

2. **CONTROLS TO CONSIDER**

2.1 restricted circulation;

2.2 document marking;

2.3 secure storage;

2.4 need-to-know access;

2.5 restricted access list or insider list;

2.6 Board paper classification as Part 2M;

2.7 communications controls;

2.8 external adviser confidentiality arrangements;

2.9 FOIA / EIR handling note;

2.10 legal advice;

2.11 sponsor department notification, if appropriate;

2.12 disclosure timing and route; and

2.13 review date.

2.14 Any concern about market-sensitive information must be escalated to the General Counsel. Where the matter is significant, the General Counsel should consider escalation to the Chief Executive, Chair, Audit and Risk Assurance Committee, sponsor department or external legal advisers.

SCHEDULE 10 - CHANGE CONTROL AND REVIEW RECORD

Version	Date	Approved by	Summary of change
0.1	13 July 2026	Draft for review	Initial draft
1.0	20 October 2026	Board	Approved policy