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Reclosure Panel – Public Minutes		THE NATIONAL ARCHIVES
Date: 10 February 2026	Time: 09:30-11:00	
	Location: Meeting Room 21D / MS Teams	
Attendees		
Lucy Fletcher (LF)	Linda Stewart (LS)	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]		
Apologies		
[redacted]	[redacted]	

Minutes:

The panel welcomed [redacted] *and* [redacted] *to the Reclosure Panel meeting.* General introduction/discussion of panel membership – [redacted] & [redacted] to join on permanent basis

1) Actions/queries from previous meeting (held 16 December 2025)

1.1. T 319/2456: As requested, the Panel was presented with advice on sensitivities from stakeholders.

The Panel agreed to redact as recommended.

1.2. DEFE 70/213

Panel noted and agreed that one specific letter and the personal information of one individual within two other pages are to be redacted. Overall, the closed extract will consist of 3 pages.

1.3. DEFE 70/176: The case handler re-reviewed the record and confirmed that redaction would render the file unreadable. Additionally, the file does not contain any information already found in the public domain. Recommendation remains to close in full.

Panel noted and agreed.

1.4. CRIM 1/5213: The panel agreed full closure under s38(1)(a) & 40(2) but had queried the age of the victim and asked that this be included in the report.

This information was added to the Reclosure report.

Panel noted and agreed.

1.5. DPP 2/987 & DPP 2/1018: Panel were provided with further information on closure periods. On re-review, it was determined that both parts can open with redactions as they contain some information not covered by either sections 38(1)(a) or 40(2).

Panel noted and agreed.

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1.6. CRIM 1/3485: The Panel had noted that this is a high profile and prominent case and, given the amount of information in the public domain, sought further advice on whether redaction was feasible.

Revised recommendation to create open extract.

Panel noted and agreed.

1.7. HO 522/5: Following further review of the record alongside further research as requested by the Panel, the data subject's information was found to be in the public domain, and it was determined that they were likely to be no longer living.

Revised recommendation to open in full.

Panel noted and agreed.

1.8. LO 2/132 & 134: The Panel were not convinced on the strength of the application of s40(2) and asked whether the files could be re-reviewed in consultation with the Data Protection Officer to consider if continued disclosure would be unfair and unlawful.

After a re-review, and on advice, the Panel agreed it was neither proportionate or fair to keep the name of the individual in the public domain considering the rehabilitation of offenders.

Panel noted and agreed in line within initial recommendation (full closure).

2) Case recommendations – full closures & redacted opens

2.1. J 277/102 – Recommendation: full closure under sections 38(1)(a) & 40(2) for 97 years, until 2074

Recommendation agreed

2.2. J 265/36 – Recommendation: full closure under sections 38(1)(a) & 40(2) for 99 years until 2074

Recommendation agreed

2.3. BW 116/25 – Recommendation: redacted opening under section 40(2) for 97 years until 2085

The Panel queried whether s31 needs adding.

Recommendation not agreed

2.4. JA 653/58 – Recommendation: redacted opening under section 40(2) for 99 years until 2104

The Panel queried whether the submissions were provided under an expectation of confidence, as it was noted that some submissions were originally constituent letters to MPs.

The Panel also queried whether it was feasible to redact names, and not the subjects' related experiences.

Recommendation not agreed – handler to re-check redaction and the expectation of

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confidentiality

2.5. J 267/913 – Recommendation: full closure under sections 38(1)(a) & 40(2) for 95 years until 2079

Recommendation agreed

2.6. FCO 15/6399 – Recommendation: redacted opening under section 40(2) for 82 years until 2074

The Panel queried whether this includes s27(1) material.

Recommendation not agreed – to be confirmed with handler, but closure agreed in principle.

2.7. BT 217/2474 – Recommendation: full closure under section 44 for 90 years until 2050
The Panel queried the closure period, specifically how do we know when disclosure is no longer prohibited.

It was noted that this is a general challenge with the section 44 FOIA exemption, as closure periods are sometimes based on 'sunset clauses' within the specific legislation, but not all legislation has them. It was explained that the material would be re-reviewed when the proposed closure period expires, as the relevant legislation may have changed at that point, been superseded, or a sunset clause added.

Recommendation agreed

2.8. DEFE 70/251 – Recommendation: redacted opening under sections 38(1)(b) & 40(2) for 82 years until 2054

Recommendation Agreed

2.9. T 437/38 – Recommendation: redacted opening under section 40(2) & 41 for 82 years until 2069

The Panel sought clarity on the extent of the redactions. It was explained that the recommendation refers only to names under sections 40(2) and 41(1).

Recommendation Agreed

2.10. FD 7/957 – Recommendation: redacted opening under section 40(2) for 90 years until 2062

Recommendation Agreed

FD 7/958 – Recommendation: redacted opening under section 40(2) for 92 years until 2064

Recommendation Agreed

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FD 7/959 – Recommendation: redacted opening under section 40(2) for 92 years until 2064

Recommendation Agreed

FD 7/960 – Recommendation: redacted opening under section 40(2) for 92 years until 2064

Recommendation Agreed

FD 7/961 – Recommendation: redacted opening under section 40(2) for 91 years until 2064

Recommendation Agreed

FD 7/962 – Recommendation: redacted opening under section 40(2) for 91 years until 2064

Recommendation Agreed

2.11. ASSI 45/1024 – Recommendation: full closure under sections 38(1)(a) & 40(2) for 97 years until 2068

Recommendation Agreed

ASSI 45/1025 – Recommendation: full closure under sections 38(1)(a) & 40(2) for 97 years until 2068

Recommendation Agreed

2.12. PREM 49/4102 – Recommendation: redacted opening under section 40(2) for 54 years until 2060.

Previously agreed via write-round, with the report noted for audit purposes.

2.13. J 267/1022 – Recommendation: full closure under sections 38(1)(a) & 40(2) for 84 years until 2073

The Panel queried whether redaction was feasible, given the public interest.

On discussion, it was determined that redaction would not be feasible given the level of redactions needed

Recommendation Agreed

2.14. MEPO 3/2216 – Recommendation: redacted opening under sections 38(1)(a) & 40(2) for 100 years until 2043.

Recommendation Agreed

2.15. WO 305/7225/2 – Recommendation: redacted opening under sections 38(1)(b) & 40(2) for 82 years until 2077

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Recommendation Agreed

2.16. J 82/4287 – Recommendation: full closure under sections 38(1)(a) & 40(2) for 89 years until 2065.

The Panel queried the closure period, as there was a discrepancy between the report and the catalogue entry – it was noted that the catalogue entry is correct, report to be amended accordingly.

Recommendation Agreed

2.17. CK 2/367 – Recommendation: redacted opening under section 40(2) for 80 years until 2056

The Panel queried whether redaction was needed for the general manager named in the document.

The name does appear in local press articles relating to this case. Other names to propose for redaction have a stronger case for removal.

The Panel agreed that given the amount of information in the public domain, anything mentioned in contemporary reporting of this case should remain open.

The Panel agreed with a redacted open as suggested, but propose disclosing the general managers name – this was agreed to be proportionate

2.18. AVIA 4/11 – Recommendation: redacted opening under section 44 for 90 years on a "rolling-10" basis until 2050

Recommendation Agreed

2.19. IR 40/19334 – Recommendation: full closure under sections 23(1), 24(1) & 26(1)(a)(b) for 50 years on a "rolling-10" basis until 2034

Recommendation Agreed

2.20. T 464/492 – Recommendation: full closure under sections 23(1), 24(1) & 26(1)(a)(b) for 50 years on a "rolling-10" basis until 2033

The Panel noted that redaction was not feasible.

Recommendation Agreed

T 464/493 – Recommendation: full closure under sections 23(1), 24(1) & 26(1)(a)(b) for 50 years on a "rolling-10" basis until 2033

Recommendation Agreed

T 475/63 – Recommendation: full closure under sections 23(1), 24(1) & 26(1)(a)(b) for 50 years on a "rolling-10" basis until 2031

Recommendation Agreed

2.21. J 82/1169 – Recommendation: redacted opening under sections 38(1)(a) & 40(2) for 90 years until 2065

Recommendation Agreed

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2.22. Reclosure project: BN 27 review

BN 27/52 – Recommendation: redacted opening under section 40(2) for 82 years until 2061
Recommendation agreed

BN 27/53 – Recommendation: redacted opening under section 40(2) for 82 years until 2061
Recommendation agreed

BN 27/60 – Recommendation: redacted opening under section 40(2) for 82 years until 2062
Recommendation agreed

BN 27/67 – Recommendation: redacted opening under section 40(2) for 82 years until 2064
Recommendation agreed

BN 27/79 – Recommendation: redacted opening under section 40(2) for 82 years until 2065
Recommendation agreed

BN 27/86 – Recommendation: redacted opening under section 40(2) for 82 years until 2065
Recommendation agreed

BN 27/88 – Recommendation: redacted opening under section 40(2) for 82 years until 2065
Recommendation agreed

BN 27/90 – Recommendation: redacted opening under section 40(2) for 82 years until 2065
Recommendation agreed

BN 27/100 – Recommendation: redacted opening under section 40(2) for 72 years until 2045
Recommendation agreed

BN 27/103 – Recommendation: redacted opening under section 40(2) for 72 years until 2045
Recommendation agreed

BN 27/121 – Recommendation: redacted opening under section 40(2) for 79 years until 2060
Recommendation agreed

BN 27/122 – Recommendation: redacted opening under section 40(2) for 79 years until 2060
Youngest age of 21 assumed – The Panel queried this. The case handler confirmed that as the record pertained to claims for disability allowance, it was determined that 21 was a suitable youngest age to assume.
Recommendation agreed following discussion

BN 27/127 – Recommendation: redacted opening under section 40(2) for 82 years until 2063
Recommendation agreed

BN 27/128 – Recommendation: redacted opening under section 40(2) for 80 years until 2063
Recommendation agreed

BN 27/57 – Recommendation: open in full

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Recommendation agreed

BN 27/63 – Recommendation: open in full
Recommendation agreed

BN 27/66 – Recommendation: open in full
Recommendation agreed

BN 27/69 – Recommendation: open in full
Recommendation agreed

BN 27/70 – Recommendation: open in full
Recommendation agreed

BN 27/71 – Recommendation: open in full
Recommendation agreed

BN 27/74 – Recommendation: open in full
Recommendation agreed

BN 27/76 – Recommendation: open in full
Recommendation agreed

BN 27/77 – Recommendation: open in full
Recommendation agreed

BN 27/85 – Recommendation: open in full
Recommendation agreed

BN 27/87 – Recommendation: open in full
Recommendation agreed

BN 27/92 – Recommendation: open in full
Recommendation agreed

BN 27/94 – Recommendation: open in full
Recommendation agreed

BN 27/108 – Recommendation: open in full
Recommendation agreed

BN 27/110 – Recommendation: open in full
Recommendation agreed

BN 27/111 – Recommendation: open in full
Recommendation agreed

BN 27/112 – Recommendation: open in full

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Recommendation agreed

BN 27/113 – Recommendation: open in full
Recommendation agreed

BN 27/114 – Recommendation: open in full
Recommendation agreed

BN 27/115 – Recommendation: open in full
Recommendation agreed

BN 27/117 – Recommendation: open in full
Recommendation agreed

BN 27/118 – Recommendation: open in full
Recommendation agreed

BN 27/119 – Recommendation: open in full
Recommendation agreed

BN 27/120 – Recommendation: open in full
Recommendation agreed

BN 27/123 – Recommendation: open in full
Recommendation agreed

BN 27/124 – Recommendation: open in full
Recommendation agreed

BN 27/125 – Recommendation: open in full
Recommendation agreed

BN 27/126 – Recommendation: open in full
Recommendation agreed

2.23. Reclosure project: PREM 15s

The Panel was introduced to the broader digitisation project. In collaboration with NIO, TNA will digitise records relating to the Troubles ('68-'98). There are 22 broad themes. This particular batch of records relate to the "outbreak of violence".

For this theme, CEE have been looking at several record series. The PREM 15 records contain Prime Minister's briefings (in this case Edward Heath). The whole series is ~2000 records, and of those, 93 have "Northern Ireland" in the title.

Most of the records consist of policy documents, relating to the broader picture, with few sensitivities, but it was noted that given the historical context these records may contain sensitive information requiring

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reclosure. It was noted that some similar information is withheld in other series of records held by TNA, such as the WO 305s.

Reclosure recommendations will be presented to Reclosure Panels as a schedule – but reports will be drafted for records where the recommendations are out of the ordinary (i.e. not section 38 & 40).

The Panel acknowledge that there may be further sensitivities in other records transferred to TNA post passing of FOIA and before it came into force, remaining wary of any further flags/concerns raised around possible sensitivities.

PREM 15/1001 – Recommendation: open in full
Recommendation agreed

PREM 15/1015 – Recommendation: redacted opening under sections 38(1)(b) & 40(2) for 85 years until 2058
Recommendation agreed

PREM 15/1014 – Recommendation: Redacted opening under sections 38(1)(b) & 40(2) for 84 years until 2057
Recommendation agreed

PREM 15/1010 – Recommendation: Redacted opening under sections 38(1)(b) & 40(2) for 84 years until 2057
Recommendation agreed

PREM 15/1013 – Recommendation: Redacted opening under sections 38(1)(b) & 40(2) for 84 years until 2057
Recommendation agreed

3) Access Under Review (AUR) records returned to open access

A schedule of 9 records that were reviewed by the FOI Centre and are to revert to open status was presented to the Panel for their information. These records previously had an 'access under review' status and were found not to contain any sensitive information.

3.1 **CJ 4/7427** - Gibraltar shootings (Operation Flavious), March 1988
3.2 **T 630/41** - Strategic Defence Initiative: UK participation
3.3 **T 537/29** - White Paper accounts 1982-1983 and 1983-1984: aviation and shipbuilding
3.4 **T 536/197** - Channel Fixed Link: Concession Agreement; frontier control and policing
3.5 **DEFE 70/237** - Formation of a new Northern Ireland Local Reserve Force: Ulster Defence Regiment (UDR); parliamentary business, recruitment and logistical requirements
3.6 **DEFE 70/252** - Equipment requirements for the Ulster Defence Regiment and Royal Ulster Constabulary
3.7 **T 383/662** - Falkland Islands and Dependencies: general policy
3.8 **WO 32/21734** - WO 32/21734 - Equipment: vehicles for the Ulster Defence Regiment (UDR)
3.9 **HO 405/2641** - BEENS, H P Date of Birth: 30.09.1895

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4) Virtual FOI Reclosure cases (BAU)[1]

The Panel noted that there were no records on the BAU Virtual Reclosure schedule for the February 2026 reclosure panel

5) Virtual FOI Reclosure cases (seen by Panel Chair)

The Panel noted that the below record on the Virtual Schedule (further consideration) that had previously been 'Access under Review' was now resolved following an FOI request, having been through the complete FOI process. This case was also seen and approved by the Reclosure Panel Chair, as it met the criteria for further consideration.

5.1. CJ 4/11724

The virtual reclosure process (AUR Records being requested under FOIA) was explained to the new panel members, as was the difference between BAU reclosure cases and those sent to be approved by the Panel chair.

6) Any other business

6.1. Recurring item: Access Under Review (AUR) data at TNA
Panel noted the reduction in core caseload (56 records remaining)

The panel also noted the AB/ES stats.

6.2. Date of next meeting: 01 April 2026, 14:00-15:30, Room TBA & MS teams

[1] Virtual' reclosure occurs where a Freedom of Information request is received for a record held at The National Archives which has the status of 'access under review'. The review of these records is conducted through the standard FOI process, which includes consultation with the transferring department and (if a qualified exemption applies), the Advisory Council for National Records and Archives (ACRNA) and the Secretary of State for the Department for Culture, Media and Sport.