Redaction Guidance and checklist

Where redactions are ABSOLUTELY NECESSARY

- The 3rd party provisions are essentially to protect other **individuals** who have a necessary and legitimate expectation of privacy…obvious examples would be whistle-blowers
- Where a child has been removed from a parent and then placed into foster care, then details of the placement must necessarily be kept confidential
- Cases that are the subject of ongoing legal proceedings and all records relating to adoptions
- Where it is considered that an individual might be affected mentally or emotionally by the release of medical/psychiatric evaluations, the advice of the medical professional should be sought prior to release.
- Information categories which are the subject of statutory exemptions:
  - Confidential references
  - Management negotiations
  - Exam scripts
  - Legal/criminal prceedings

Where redactions are definitely NOT necessary

- In any correspondence received from, or addressed to, the applicant – including documents that you know will have already been supplied to the applicant
- 3rd party individuals' information where the information is already known to the requester eg. The name and address of a foster carer that an applicant lived with as a child, as that information is already known to them
- The names of any school staff
- The names and/or the comments of professionals acting in their professional capacity eg. Police, care home managers, foster carers etc.
- Only where a file has been reviewed and there are areas of sensitivities is it appropriate to consult with 3rd party professionals. If, for example, a professional makes an inappropriate comment and may be the subject of intimidation – the comment would remain and we may also reveal the author

Other considerations:

The sensitivity of information diminishes over time. The older the information, the less likely it is necessary for information to be redacted. Many take the view that the old Public Records Act benchmark of anything over 30 years old should be disclosable automatically. This has recently been reduced to 20 years, but this is still being phased in. This demonstrates the shift to greater openness and transparency. All information should still be reviewed for sensitivities, but it is a useful guide.

Very recent information (under 5 years) and wherever the child remains "looked after" must be dealt with much more carefully.

Consideration must be given to the views of the child when releasing information to their family members. Children are generally considered old enough to submit their own requests from the age of 12, but this must be considered on a case by case basis. A bright, stable 10 year old may be capable of understanding, whilst a vulnerable or distressed 14 year old might not. The key point here is that the child is the "data subject" and their parents do not have an automatic right to their children's

General principles for redaction

1. Always carry out redaction on a copy of the original record, whether paper or electronic, never on the record itself. This ensures that while the redacted information is permanently removed from the copy of the record (which can then be made accessible) the original text remains in the original record.

2. Electronic copies should be saved into appropriate folder with "_Redacted" appended to the filename

3. Redaction should never result in the complete removal of text or information from an original record.

4. Ensure you have the complete set of the information before you start the redaction process.

5. Review the overall case before you start and seek advice from the officer who knows the

case

6. Identify the players – make notes of the names and relationships

7. Set the broad rules under which you will be conducting the redactions where they are appropriate

8. Block out a specific time in your diary and stick to it. Book a separate room, or move to an empty desk, so that you don't get distracted, and can't mix up papers (if you are doing it manually).

9. Don't waste time reviewing documents you don't have to Such as; correspondence to/from the applicant and Information outside the scope of the request – e.g. If the request only asks for information for a particular time period, discount information outside of that time frame.

10. Keep a note or create a schedule (for large bundles) of the information that has been redacted/withheld with the explanation of the exemption that has been applied (if you are redacting manually).

11. Information to be redacted is quality checked and approved by a manager or officer involved with the case before release, to ensure it is appropriate to release.

12. Seek advice from the Information Governance Lead if you are unsure about any information or the process.

Using Adobe Pro DC Redaction Software

IT can provide you with Adobe Pro DC Redaction software. Please contact the IT service desk to find out about how you can get the software.

Where you have access to the Councl's Adobe Pro DC Redaction Software, the information will need to be converted to PDF. Paper information should be scanned to PDF.

You will then need to save a second copy of the PDF, with 'Redacted' appended to the file name.

Documents can be 'marked' for redaction before you actually redact it. This is useful if you need someone else to check or review the information that is to be redacted before you actually go ahead and redact it. See below guidance on 'Add redaction code'.

Once you have 'marked' the document you add the exemption or the reason for the redaction, by going to properties and adding the 'exemption applied or reason for redaction in the 'Custom Text' box. Ensure the 'Use Overlay Text' is ticked.

Once you are happy with the 'marked' text or phrases and you have added your reasons for redaction or exemption, you can 'Apply' the redaction. See below guidance on 'Redact a Document'.

Watermark all the pages being released, including redacted pages, with the following- 'Released under subject access request'. See below guidance on 'Add a Watermark'.

You can now follow the easy step by step guidance to carryout redaction on the PDF information-

- [Edit scanned PDF's](#)
- [Redact a document](#)
- [Add a watermark](#)
- [Combine documents](#)
- [Add redaction codes](#)
- [Remember pages](#)

For more information on Adobe Pro DC Redaction Software please go to-

https://helpx.adobe.com/acrobat/using/removing-sensitive-content-pdfs.html#change_the_look_of_redaction_marks_acrobat_pro

Carrying out redaction manually

Where you do not have access to the Adobe Pro DC Redaction software you will need to carry out the redaction manually. You will be required to copy all the information first onto single sided copies, and only conduct redactions on the copy. It helps to also copy the front page of the file if that contains information also such as the file name and number and dates etc.

Keep a separate set of redaction stationery – Good tools help!

• More than one black chisel tip marker – in case they run out

• A ruler (for doing large blocks of text)

• Post-it notes in different colours (in case you need to colour code)

• A pad for putting under papers (as markers often bleed through)

• A notepad for recording abbreviations and making notes about documents to be withheld in their entirety

• Pre-printed stickers:

"Information has been withheld from disclosure by virtue of Section 7 (4) of the DPA 1998 as it relates to a third party"
• Large pot of coffee!

Create a schedule of the information that has been redacted/withheld (in particular for large bundles), with the explanation of the exemption that has been applied.
Other steps you must take prior to release:

Often you will have duplicated documents. You should not spend time trying to de-duplicate the information. It is more important to ensure the redactions are consistent.

Do not redact all the information on a document or so much information as to make its sense indecipherable. Instead you should withhold the document in its entirety

Information to be redacted should be quality checked and approved by a manager to confirm that all data has been redacted appropriately.

The response should explain the description of the information that has been supplied; and the fact that information has been redacted/ withheld and the reasons why. The explanation should be given in plain English, and does more than simply specify that a particular exemption applies. This should be presented schedule for large bundles.

The response must also outline the internal appeals process; and provide details of the Information Commissioners role and contact details. Please refer to the SAR acknowledgement and response templates on the intranet.

All hard and pdf copies ready for release should be watermarked 'released under subject access request' before release.

A copy of the disclosure bundle showing the redactions and the reasons behind them should be retained for reference.

The final response should be sent by Registered Post or sent by encrypted email via Egress. Alternatively, individuals can also pick up their responses if they prefer.
Useful Information:

The National Archives Redaction Toolkit
http://www.nationalarchives.gov.uk/documents/information-

management/redaction_toolkit.pdf

The Information Commissioner's Subject Access Code of Practice:
https://ico.org.uk/media/for-organisations/documents/1065/subject-access-code-of-practice.pdf

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