



WOODBIDGE HIGH SCHOOL

Redaction Guidance and Checklist

Spring 2026

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 proceedings

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 information.

Any Subject Access Requests which may require redaction should be considered using Appendix A – Reasonable Search Guidelines.

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, or other software, where available

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 Council'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](#)

Completed redactions using Adobe Pro or any other redaction software must be manually checked once completed.

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>

Use of AI for Redactions

There are now many solutions available which use AI to provide redactions. These should be used with caution. Results should be carefully checked, and AI should not be used to redact Subject Access Requests.



Appendix A – Guidance on Reasonable Searches for Information

Reasonable Search

UK GDPR places a high expectation on schools to provide information in response to a SAR. Schools should make reasonable efforts to find and retrieve the requested information. However, they are not required to conduct searches that would be unreasonable or disproportionate to the importance of providing access to the information. To determine whether searches may be unreasonable or disproportionate, schools must consider:

- the circumstances of the request.
- any difficulties involved in finding the information; and
- the fundamental nature of the right of access.

Example searches

Information	Note	Additional
Pupil Record	Only core record not ephemeral information	For example, not post it notes, memo's, class lists, duplicates
Emails	Only relevant staff, current class teacher, Head and specialist roles if applicable e.g., pastoral care, SENco or Safeguarding lead	Emails intended as information only with just the requesters email address copied in with no personal information in the body do not need to be disclosed.
Information systems	Only information relevant to the individual	Not metadata, system generated reminders, system logs or user fields
Safeguarding records	Whole record	Redact other children, references to junior members of staff, seek third party consent if





		relevant.
Staff file	Whole record	Only exempt third party data
Unstructured data	Only where relevant	Seek advice
Grievance and Disciplinary action files	Only sections directly covering the requester	Seek advice

A note on time

If you receive a request where it is genuinely unclear whether an individual is making a SAR, then the time limit does not begin until you have clarified whether the individual is making a SAR, and what personal data they are requesting. In such cases, you are expected to contact the individual as quickly as possible (for example by phone or email where this is appropriate). You should keep a record of any conversation with an individual about the scope of their request and the date when you sought and received any further explanation.

In all circumstances, you should explain to the individual why you are seeking further details and be able to justify your position to the ICO, if asked to. A request for all information held does not require clarification.

When you ask for clarification, the timescale for responding will stop until the requester clarifies the request and will resume on the date you receive clarification from the requester.

Note: Subject Access requests can be made verbally. This can lead to confusion if the requester does not receive the information that they thought they had requested. It is good practice with to write the organisations understanding of the request in the formal acknowledgement of the request to help avoid this confusion.

Manifestly unreasonable or excessive request.

A first request for information under the right of access cannot be considered as unfounded or excessive.

A subsequent request may be manifestly unfounded if:





- the individual clearly has no intention to exercise their right of access. For example, an individual makes a request, but then offers to withdraw it in return for some form of benefit from the organisation; or
- the request is malicious in intent and is being used to harass an organisation with no real purpose other than to cause disruption. For example, the individual:
 - explicitly states, in the request itself or in other communications, that they intend to cause disruption;
 - makes unsubstantiated accusations against you or specific employees which are clearly prompted by malice;
 - targets a particular employee against whom they have some personal grudge; or
 - systematically sends different requests to you as part of a campaign e.g., once a week, with the intention of causing disruption.

This is not a simple tick list exercise that automatically means a request is manifestly unfounded. You must consider a request in the context in which it is made. If the individual genuinely wants to exercise their rights, it is unlikely that the request is manifestly unfounded.

To determine whether a request is manifestly excessive you need to consider whether it is clearly or obviously unreasonable. You should base this on whether the request is proportionate when balanced with the burden or costs involved in dealing with the request.

A subsequent request may be manifestly excessive if:

taking into account all the circumstances of the request, including:

- the nature of the requested information.
- the context of the request, and the relationship between you and the individual
- whether a refusal to provide the information or even acknowledge if you hold it may cause substantive damage to the individual
- your available resources
- whether the request largely repeats previous requests, and a reasonable interval hasn't elapsed; or
- whether it overlaps with other requests (although if it relates to a completely separate set of information it is unlikely to be excessive).



Remember, a request is not necessarily excessive just because the individual requests a large amount of information.

Approval: Approved by the F&GP Committee on 4th February 2026

Reviewer: Headteacher and School Business & Finance Manager

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