



# Holt Community Primary School

## Redaction Guidelines

**[Version 2018 v1.0]**

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If you would like to discuss anything in this privacy notice, please contact:

Data Protection Officer: [dpo@dataprotection.education](mailto:dpo@dataprotection.education)

If you would like a copy of any documentation, please contact the school office:

[office@holt.norfolk.sch.uk](mailto:office@holt.norfolk.sch.uk)



## Document Version

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## Introduction

This guidance has been produced for reference when removing content from data provided under a request for information, such as a Subject Access Request (**SAR**) or Freedom of Information (**FOI**) request.

In order to comply with an SAR or FOI request, schools may be required to provide some information that identifies another individual. In order to protect their data protection rights this Personally Identifiable Information (PII) must be removed by editing the document before release.

## What is redaction?

Redaction is the separation of disclosable from non-disclosable information by blocking out individual words, sentences or paragraphs or the removal of whole pages or sections prior to the release of the document. In the paper environment some organisations will know redaction as extracts when whole pages are removed, or deletions where only a section of text is affected.

## Scope

This guidance is for all employees who have responsibility for preparing a response to a SAR or FOI.

## Why redact?

Redaction is carried out in order to edit exempt details from a document. Use it when one or two individual words, a sentence or paragraph, a name, address or signature needs to be removed.

## Identifying what to redact

When deciding what to redact, all information relating to the someone who is not the data subject must be removed.

This includes:

- Name
- Address
- Date of birth
- Email address
- Phone number
- Job title (if this is an identifier of them directly, i.e. the Headteacher)
- Signature
- Health data (i.e. information about sick leave or an operation)

When redacting it is important to:

- Have the staff member who is knowledgeable about the document involved in the process. They will be able to help determine what is exempt as they know the information best
- Only redact the exempt material and not a whole paragraph for 2 or 3 words that cannot be disclosed
- Ensure electronic redaction cannot be removed or reversed
- Ensure personal information cannot be deduced from the remaining data
- Check other records of the same document to ensure consistent redaction

When the redaction necessary to protect someone else's personal data is so significant that it renders the document unintelligible then providing a summary is acceptable.

## Redaction Methods

There is a range of redaction methods, and any may be used effectively according to what best suits the organisation concerned. This may depend on issues such as the structure and content of the document, the degree of confidentiality, and the cost and time available.

Whichever method is employed, the end result must ensure that the redacted material cannot be seen or guessed due to incomplete redaction. This means checking to make certain that words cannot be made out when the document is held up to light or that the ends, top or bottom of text are not visible.

### Hard Copy files

#### Cover-up tape

The simplest form of redaction is to use a high-quality cover-up tape that can be placed on the original documents over the areas to be redacted, taking care that no parts of words are showing. By making a photocopy of the redacted text, an access version is produced ready for presentation.

The tape is white, and acts in much the same way as if using correction fluid, but can be reused several times. It is available in 1/6 inch for a 10-12 font typewritten line, 1/3 inch for two typewritten lines and 1 inch for general corrections.

#### Blacking/whiting out

Another simple solution is to photocopy the original document and use a black marker pen to block out the sensitive material. The redacted version should then be photocopied again to produce an access version. The further photocopy is necessary as information redacted using marker pen can be read when held up to light.

The same process can be employed substituting a good quality correction fluid for marker pen. Ensure that no redacted text is visible before making the second photocopy, which again is necessary as correction fluid can be easily removed.

#### Photocopier with redaction facilities

Photocopiers are available which, in addition to normal copying functions, also have facilities to remove marked out areas on a document automatically. They provide a secure method of redaction, as there is no possibility of the removed text being visible after copying. However, they are limited in their effectiveness as the programmes can, at present, only remove paragraphs and stand-alone areas of text such as addresses or signatures. They cannot reliably detect small areas of data such as sentences or individual words.

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A photocopier of this nature would probably be cost-effective only for organisations carrying out a large volume of redaction, where savings on more conventional materials would outweigh the cost of investing in such a copier.

### Electronic Files

The redaction of electronic records should always be carried out in accordance with the following principles:

- Never redact the original or master version of an electronic record - redaction must always be carried out on a new copy of the record, either in paper or electronic format.
- Redaction must irreversibly remove the required information from the redacted copy of the record.
- Carry out electronic redaction in a controlled and secure environment that provides access only to those trained and authorised to carry out redaction.
- Delete all intermediary stages of the redaction process. Only the original record and the appropriately redacted copy should be retained.

### Traditional redaction

For electronic records, which can be printed as a hardcopy, traditional redaction techniques, as described above, can be applied. Either the record may be printed, and redaction carried out on the printed copy, or the information may be redacted from an electronic copy, which is then printed. If the redacted copy is required in electronic format, this can be created by scanning the redacted paper copy into an appropriate format.

### Conversion

An electronic record may be redacted through a combination of information deletion and conversion to a different format. Certain formats, such as plain ASCII text files, contain displayable information only. Conversion to this format will, therefore, eliminate any information that may be hidden in non-displayable portions of a bit stream.