



Corporate Guidance on Redaction

Version Awareness

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1. Purpose

The purpose of this document is to provide employees with advice and guidance on how to remove (redact) information from a document prior to its release, sharing with others including partner organisations or publication to ensure that the risk of a data breach is minimised and the Council is compliant with its regulatory and legal obligations.

This Guidance is aimed at those employees who handle, publish, release, share or manage information in accordance with the following legislation:

- Freedom of Information (Scotland) Act 2002
- Environmental Information (Scotland) Regulations 2004
- Data Protection Act 2018
- Common Law Duty Of Confidentiality
- Local government (Scotland) Act 1973 as amended

The above list is not exhaustive and other legislation may apply.

It is not within the scope of this document to provide advice and guidance in respect of the management of the above. Reference should be made to specific subject matter guidance which is held by your service or subject expert.

2. Introduction

The Council regularly shares information with internal services, external organisations, partners, elected members and responds to requests for information from members of the public. Employees must ensure that only information which can be legitimately released or shared is done so. Where information cannot be released or shared then a decision must be taken on whether to withhold the release of the information in its entirety or apply redaction.

3. What is Redaction?

Redaction is a terms used to describe the editing process whereby information is removed from a document. It is a process which is undertaken to render information unreadable. This is done by blocking out individual words, sentences and paragraphs or by removing whole pages or sections prior to the release of the document.

4. Identifying Information for Redaction

The personal data of living individuals, including employees, customers and service users and members of the public is protected under data protection legislation and should be withheld or redacted, except in certain circumstances.

Wherever there is a duty or expectation of confidentiality, that information should be withheld or redacted, except in certain circumstances. It is possible such information

will be withheld rather than redacted, in which case a public interest test may be necessary or requirement to determine if a legislative exemption applies.

5. Commonly Redacted Information

There are details which are commonly redacted and in all cases where redaction is applied, the reasons must be stated and any legislative exemptions/exceptions applied. For example releasing personal identifiers in a response to a request for information under Data Protection or Freedom of Information legislation.

5.1 Names and Contact Details

In certain cases it may not be appropriate to release contact names and contact details of employees below Head of Service level as a matter of course. However there may be circumstances where it is appropriate to do so. For example if an employee's name and contact details are already within the public domain through attendance at public meeting there would be no need to redact these from published minutes.

When redacting names ensure redaction is followed through by redacting any pronouns which relate to redacted names. For example her/his, he/she.

5.2 Signatures

In most cases, signatures constitute personal data as they can identify the person signing and should be redacted as a matter of course prior to release of publication.

5.3 Subject Access Requests

When dealing with redaction of names in relation to Subject Access requests, considerations are different. It is important that the rights of the individual's names on documentation should be weighed against the right of access of the individual who is seeking the information. Further information is provided in the [Guidance on Handling Subject Access Requests](#).

6. Redaction Criteria

The following tables outlines the categories of information that should be redacted (or withheld) and the relevant circumstances.

Type	Examples	Reason for Redaction	Exceptions to redaction
Bank Account Details	Individuals	Personal Information	<ul style="list-style-type: none"> Data Subject (an individual) exercising their data protection rights including access over own data
	Business/organisations	Confidential Information	
Commercial Information	Details of contractual arrangements with external providers	Confidential Information	
Criminal Offence Data	Any information in connection with an offence	Personal Information	<ul style="list-style-type: none"> Data Subject (an individual) exercising their data protection rights including access over own data
Date of Birth	Including day, month or year or any combination of these	Personal Information	<ul style="list-style-type: none"> Data Subject (an individual) exercising their data protection rights including access over own data
Home address	All lines of an individual's home address, including postcode	Personal Information	<ul style="list-style-type: none"> Data Subject (an individual) exercising their data protection rights including access over own data Home Addresses of planning applications Address of anyone making objections/representations to a planning application
Legal Communications	Information relating to legal proceedings or advice	Confidential Information	
Name	Including all first, middle and last names along with nicknames	Personal Information	<ul style="list-style-type: none"> Names of planning applicants and any individuals making objections/representations Licensees on Licensing registers. Data Subject (an individual) exercising their data protection rights including access over own data Senior ERC staff and other authorised signatories of the Council agreeing to non-redaction of signature Senior third party representatives, acting in an official capacity on behalf of their organisations ad not at a personal level Names of officers in published minutes which are in public domain through attendance at a public meeting

Personal Email Addresses	To include any part of a business email address that includes an individual's name	Personal Information	<ul style="list-style-type: none"> • Data Subject (an individual) exercising their data protection rights including access over own data • Senior ERC staff and other authorised signatories of the Council agreeing to non-redaction of signature • Senior third-party representatives, acting in an official capacity on behalf of their organisations and not at a personal level • Data already published and in the public domain
Personal telephone numbers	Including landline and mobile numbers	Personal Information	<ul style="list-style-type: none"> • Data Subject (an individual) exercising their data protection rights including access over own data • Data already published and in the public domain.
Pronouns	In relation to redacted names i.e. her/his or he/she	Personal information (to ensure redacted text is not deducible from surrounding text)	<ul style="list-style-type: none"> • Senior ERC staff and other authorised signatories of the Council agreeing to non-redaction of signature • Senior third-party representatives, acting in an official capacity on behalf of their organisations and not at a personal level
Sensitive personal information (special categories)	Any information revealing an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or data concerning a person's sex life or sexual orientation.	Personal Information	<ul style="list-style-type: none"> • Data Subject (an individual) exercising their data protection rights including access over own data
Signatures	Handwritten or electronic	Personal Information	<ul style="list-style-type: none"> • Data Subject (an individual) exercising their data protection rights including access over own data
Title	Ms/Mrs/Miss/Mr/Master/Dr/Professor	Personal information (to ensure redacted text is not deducible from surrounding text)	<ul style="list-style-type: none"> • Senior ERC staff and other authorised signatories of the Council agreeing to non-redaction of signature • Senior third-party representatives, acting in an official capacity on behalf of their organisations and not at a personal level

7. Managing Redaction

Irrespective of whether information is held electronically or in paper format there are certain principles which apply to the redaction process. The principles are listed below:-

- Never alter the original document as redaction can be challenged.
- Original text should always be in the original document.
- Use redaction to remove single words, sentences or paragraphs and names and addresses.
- If colour within a document makes the meaning clear, a redacted colour copy should be released.
- If a vast amount of information is being redacted consider withholding the entire document or provide an extract of the relevant information from the document.
- Redaction should be performed by the service who holds the information and by staff that are knowledgeable about the records and can determine what material is exempt.
- Redact only that information that can legitimately be exempt from disclosure.
- Do not remove a whole sentence or paragraph, if only one or two words are non-disclosable. If release of the redacted information would enable the recipients to place the missing words in context and make their meaning clear, the entire sentence can be redacted.
- Check relevant records for other copies of same documents to ensure redaction is carried out consistently.
- Check relevant indexes to ensure that they do not contain details of the redacted material.

8. Methods of Redaction

There is a range of redaction methods which can effectively be utilised:

- **Cover-up tape** can be placed on original documents over areas to be redacted and then photocopied to produce a version fit for disclosure. You are still required to go over the redacted portion with a black pen in order to highlight that the information has been redacted.
- **Blacking out** involves photocopying the original document and using a black marker pen to block out the sensitive material.
- **Redaction tools** such as Adobe Acrobat or Pro used to edit content or remove content from documents prior to sharing or releasing.

Determining which method to be used will depend on issues such as:

- the document structure and content
- degree of confidentiality required

- cost and time available

Irrespective of the method selected the end result must ensure that the redacted material cannot be seen or guessed due to incomplete redaction. It is important to check that certain words cannot be made out when the document is held up to the light or that the ends, top or bottom of text are not visible.

9. How to Redact Information

Flowchart step guides are provided in –

[Appendix A – How to Redact Microsoft Office or Paper Files](#)

[Appendix B – How to Redact a PDF Document](#)

9.1 Paper (Hard Copy) Files

In redacting information it is important that the following steps are applied:

1. Remove document from the identified source folder/file that contains information to be redacted.
2. Photocopy the original documents and place originals back into the source folder/file.
3. On the photocopy use a black permanent marker, overwrite the information to be redacted and once completed make a second photocopy.
4. Retain original photocopy containing the redactions in the original source file.
5. Prepare a note outlining the reasons for the redactions and retain this with the source file.
6. Ensure that the redacted text is completely illegible on final copy before releasing or publishing.

9.2 Electronic Files

Electronic file redaction is more complex given the number of ways in which information can be recovered electronically. However the principles in [Section 5](#) apply equally to electronic records as they do paper records.

9.3 Microsoft Office Documents

Documents created in the Microsoft Office suite of applications (Ms Word, Excel or PowerPoint) must be redacted by following the steps detailed below:

1. From the source folder/file, make an electronic copy of the original document.
2. Ensure the original electronic file is not altered. At this stage a copy of the file could be printed and the process outlined in Section 6.1 for hard copy files followed.
3. Identify the text to be removed on the electronic copy.
4. Delete the text to be redacted and replace with the word **REDACTED**.

5. Save the newly created document in Portable Document Format (PDF) before releasing the information. This ensures the integrity of the redaction and reduces risk of being further altered.

Note

Never utilise the text highlight function to block out text and electronically issue document in this format. This does not remove the text as it can be recovered simply by removing the highlighter!!



9.4 Portable Document Format (PDF) Documents

PDF documents cannot be altered unless a user has access to the specific software Adobe Acrobat PRO read/write software. Dependent on the nature and sensitivity of the document consider the requirement for additional protection such as password protection or printing restrictions to prevent alteration of the redacted documents. Guidance and assistance about handling controls for information can be found within the [Information Classification Procedures](#).

This function is only available where Adobe Acrobat PRO software is installed on PC or laptop. The same principles ([Section 5 Managing Redaction](#)) apply.

[Appendix B](#) provides a flow chart to assist with redaction in Adobe Acrobat PRO. This may vary dependent on installed version of Adobe Acrobat PRO.

10. Withholding Without Redaction

Redaction only applies where specific elements of a page or document can be released and certain elements are withheld. If it is decided that a whole document or pages are not to be disclosed, then the information contained within it does not need to be redacted.

Instead, the information can be withheld in its entirety. However this must be referenced in any response or stated when published. For example **“this report is 45 pages long, Pages 23 to 27 have been withheld”**.

11. Checking the Redaction

Before releasing or publishing a redacted document it is good practice to check the redaction process has worked correctly.

Microsoft documents – open the redacted PDF, check that all sensitive content has been replaced with the text **REDACTED** and that the highlight function has not been used.

PDF documents – open the redacted version, select a section of text containing a redaction, copy and paste this to another document, if the redaction has not been done correctly the original text will be visible, if done correctly the redaction ‘blocks’ will be copied across.

12. Summary

Redaction must never be undertaken on an original document as to do so will impact on the integrity of the original information and may lead to a breach of relevant information legislation.

Whilst appropriate methods of redaction may vary to suit the needs and resources of the service it is important to recognise that whatever method is employed, the end result must ensure that redacted information cannot be seen or guessed due to incomplete redaction.

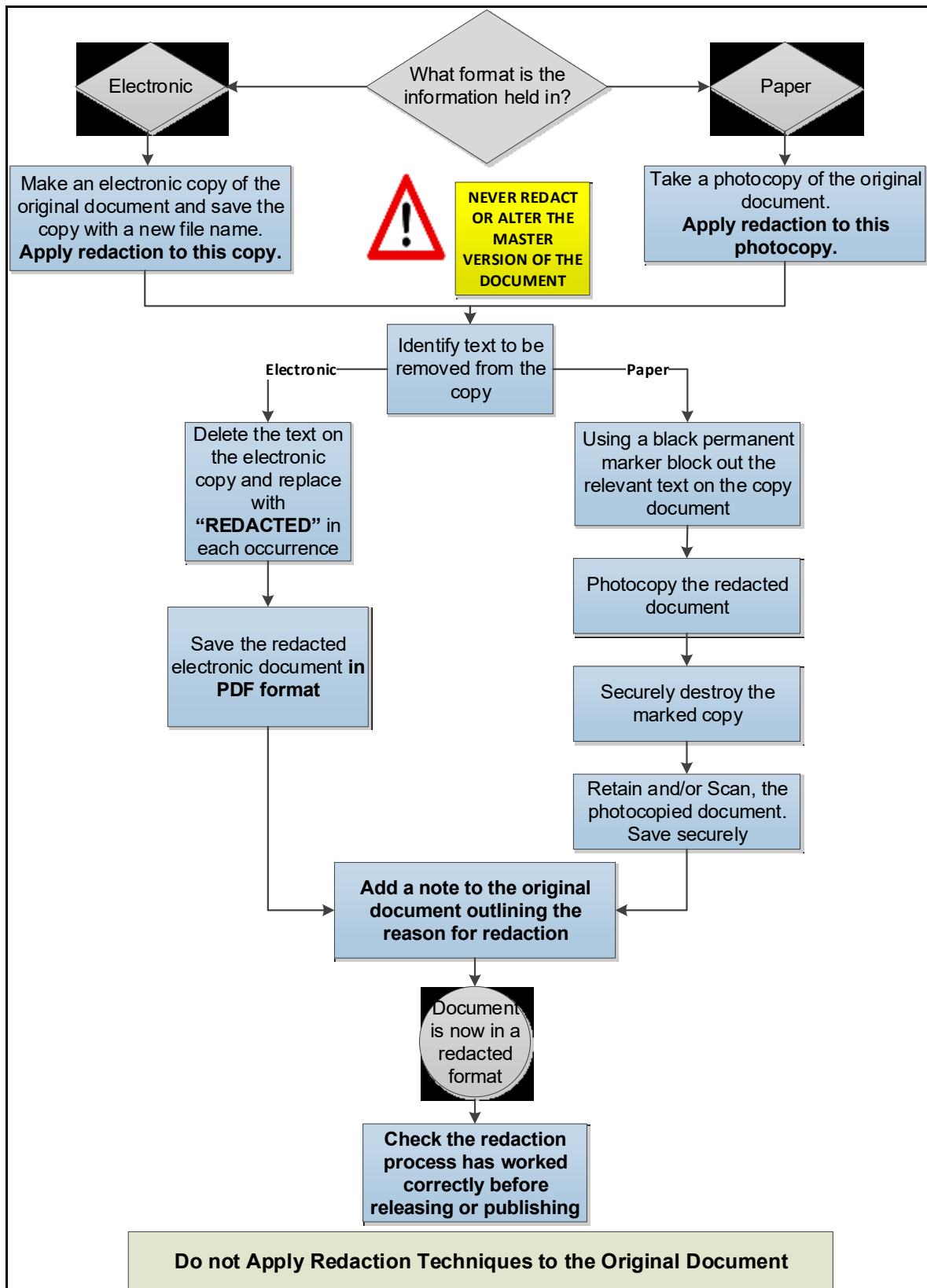
Key points to remember:

	DO	DO NOT
All Redaction	Make a copy of the original document before redacting any content	Alter the original document
Hard Copy files	Photocopy the redacted version and then send or scan this copy	Alter the original document
Microsoft Office documents	Delete text and replace with the word REDACTED	Use the highlight function
PDF files	Use Adobe Acrobat PRO to make electronic redactions on PDFs	Try to redact a PDF unless using Adobe Acrobat PRO

13. Further Information

Further information regarding this Guidance and associated procedures with regard to redaction can be sought from the [Information Governance Officer](#).

Appendix A – How to Redact a MS Office or Paper File



Appendix B – How to Redact a PDF Document

