



## REDACTION GUIDANCE

### What is redaction?

Redaction is the process of removing third party information from a document which could identify an individual.

Redaction is also used to remove any information that may cause undue emotional harm to an individual.

### Identifying material for redaction

All staff should be aware of the categories of information that should **not** be released under the Data Protection Act.

Some examples include both direct and indirect identifiers

- Named and unnamed third parties (e.g mum, George, siblings, family, friends, neighbours and any other identifiers of such people such as 'maternal grandmother' or 'friend with vitiligo')
- Gender pronouns for third parties (Jason plays with Bruce but HE has to leave early)
- Subjective personal opinion (Alfred thinks Bruce is acting out to get attention)
- Anything that can cause undue emotional harm. Examples include unsubstantiated claims such as sexual contact, or malicious insults between parties.
- Pictures and photographs.

More information on exempt material can be found on the Office of the Information Commissioner website.

### How to redact

#### PDF DOCS

We would always recommend redacting electronically rather than using paper copies to redact as it is more secure. Redacted copies should always be formatted in PDF version so changes cannot be reversed.



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There is a software tool that can be purchased such as foxit phantom – via Cardiff Council ICT that enables electronic redaction. This can be done on your PC by drawing and filling boxes over the top of the exempt text. Again two copies would be need to be saved, - redacted and un-redacted.

When redacting electronically, a record of decisions should be kept in the same way as with paper formats.

At the very least,

- Who has carried out the redaction?
- What has been redacted?
- When was this done?
- Why was this done? Quote the exemptions applied in each case.

### Paper copies

This involves photocopying the original document - photocopies should be single sided, as black marker pen will show through to the reverse side of a double sided document and using a black marker pen to block out the sensitive material.

The redacted version should then be photocopied (it may be helpful to darken the density slightly) again to produce another version.

The further photocopy is necessary as information redacted using marker pen can be read when held up to light.

A whole sentence or paragraph should not be removed if only one or two words are non-disclosable. However, the duty to protect someone's personal information overrules the duty to give someone their own information. Use your best judgement to evaluate whether the sentence is completely nonsensical and should be removed or left in with possible confusion.

It is always better to overredact rather than underreadact.

With regard to employees – we would recommend that you do not release officer names and contact details who are graded below Head Teacher Level. These need



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to be redacted from all email trails, letters / documents etc. Whilst we appreciate that parents and children will know the names of teachers and schools based staff, it is important that the privacy expectations of individuals is met at all times.