Ministry of Defence

MOD FOI/EIR Compliance Notes

Other FOI Issues and Considerations

CN60: Redaction

Document history

Version No	Reference	Date Issued	Review Date
1	CIO-3-19-1-3	September 2013	September 2014

REDACTION

Redaction is the process by which information **not** authorised for public disclosure is removed from official documents and private or official correspondence, thereby allowing the remaining information to be made public. This note provides guidance on the correct process that must be followed to ensure that redactions are always fully effective and cannot be reversed or deciphered on the public copy.

When is redaction likely to be required?

There are many situations where it may be necessary to redact information from official documents or correspondence but the most likely will be in response to requests made under the Freedom Of Information or Data Protection Acts, the Environmental Information Regulations or in response to legal proceedings and public enquiries.

The scope of redaction and the importance of following the correct process

Redactions may be applied separately to individual words, numbers, sentences, paragraphs, or indeed whole sections of a document. It is important to protect information not authorised for disclosure to ensure harm isn't caused by its inadvertent release. If information is incorrectly redacted, information may be recoverable by those able to access it and this can result in its inadvertent release into the public domain. It is important that the scope of redactions are sufficient to ensure that the redactions made are not deducible from the surrounding text. It is also important that redactions made to documents or correspondence are both consistent and logical so that if a word is redacted in one part of a document for one reason, if that reason could apply to other text, redactions are also made to that text on the basis of the same reasoning.

Redaction policy

Redaction of information, whether it is held electronically or in hard copy must be processed as follows:

Electronic information

Information to be withheld should be black highlighted using a tool such as the word highlighter tool like this ████████ and then printed off. This print out should then be scanned in and saved as a PDF. It is advisable to use black highlighting in preference to deleting any of the information in the original document as this action can change the structure and layout of the original information which would have the effect of hiding it in the publicly released PDF version. This is normally unjustifiable (unless there are specific grounds for doing so) as the format of the original document or correspondence can contribute to the recipient's understanding of the unredacted information provided.

Hard copy information

Information to be withheld should be covered with redaction tape (this can be purchased through your i-hub and come in a roll a bit like Tipex mice). The tape should be marked over with a black

marker which indicates which information is being withheld and then scanned in as a PDF. Where electronic facilities exist to blackout redactions following a scan of the information this can be used instead of redaction tape, however the electronic redaction should always be printed off and re-scanned to PDF.

<u>Where a Scanning Facility is not available</u>
Where areas do not have access to a scanning facility, information should be redacted using the electronic black highlighting method as described above, printed off and sent in hard copy. In those cases where the original documents or correspondence are only available in hard copy and it is not possible to scan these, a photocopy of the original should be taken and the process for hardcopy redactions described above followed. Only once the redacted hardcopy redacted version has been produced, photocopied and the integrity of the redactions checked, can a **photocopied** version be sent to the requester.

NOTE: REDACTION SOFTWARE IS NOT TO BE USED, ALL INFORMATION MUST BE SCANNED TO ENSURE ALL REDACTIONS ARE NOT REVERSABLE.

It is important with all redactions to only make them on **a copy** of the original document to avoid permanent changes to the original information. At the end of the process you should have four versions of the information:

1. the original (this may be in hard or soft copy);
2. An "audit" copy of the original marked with an appropriate exemption(s) or reason(s) annotated against those parts of the information not provided to the requester in the released version;
3. a final electronic "working" version in word or excel etc (or a final hardcopy version covered with redaction tape); and
4. a scanned (or photocopied) version of the final working version reflecting what has been released.

IMPORTANT: ONLY THE VERSION AT SERIAL 4 IS SUITABLE FOR PUBLIC DISCLOSURE

Withholding parts or all of a document
Often it is only legitimate to withhold some of the information requested and you are able to release documents or correspondence after having redacted certain names, figures or other exempt information.

The following are guidelines for good practice:

- Provide as much meaningful information as possible. For example, when redacting names you may still be able to give an indication of the person's role, or which pieces of correspondence came from the same person. Where information in tables is exempt, consider whether it is also necessary to redact the title of the table and table headings as these can help the requester understand why it has been necessary to redact the table content; and

- As far as possible, ensure that what you provide makes sense. If you have redacted so much that the document is unreadable, consider what else you can do to make the information understandable and useful for the requester. In some cases where there is so

MOD FOI/EIR Compliance Notes

little information left after redaction it may make sense to provide a summary of the disclosable information instead of providing a redacted document.

Where can I find further redaction guidance?
In the first instance any questions about redaction should be put to the CIO-SPP-IR team on cio-foi@mod.uk who can advise. Another source of information is the The National Archives Redaction toolkit which provides general cross-Whitehall redaction guidance from which this guidance is based.