

EMPLOYMENT POLICY

Redaction

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1. Scope & Purpose

- 1.1. The purpose of this document is to provide guidance with regards to the redaction of text from documents, both physical and electronic, and its use under the Law.
- 1.2. Employees are responsible for ensuring they are familiar with the policy and any updates to this. It is the responsibility of managers and employees who handle documents/data to comply with the policy and its application.
- 1.3. This policy applies to all Lothian employees who handle/process documents and data.

2. Advice on Redaction of text from Documents

- 2.1. As a result of all recent societal and compliance changes it is now more imperative than ever to be aware of when and how to redact text from documents before sharing these with external sources or as part of Freedom of Information (FOI) or Subject Access Requests (SAR).
- 2.2. 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 a document record.

- 2.3. 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. Redaction should never result in the complete removal of text or information from a record.
- 2.4. If so much information has to be withheld that a document becomes nonsensical, the entire document should be withheld. In the case of paper documents the same principle should apply to individual pages. A copy of the information must be taken before any redaction takes place.
- 2.5. In order to redact information, it is suggested that:
 - a) The information to be withheld is cut out and then the document photocopied and given to the data subject; or
 - b) Redaction tape can be used and, once the text has been covered up, a photocopy of the redacted document may then be given to the data subject; or

- c) A black felt-tip pen (i.e. opaque ink) is used to obliterate the ineligible data and then a photocopy is taken of the redacted document (to prevent reading the redacted data through holding the page up to the light).
- 2.6. If using (c) particular care must be taken to ensure that the withheld information cannot be read through the ink.
 - 2.7. Redaction should be performed by the department which holds the information, the Data Protection Officer or by staff that are knowledgeable about the records and can determine what material is exempt.
 - 2.8. Redactions shouldn't just be blank space, it should be clear that redactions have been made to a document. The amount of information redacted should also be clear.
 - 2.9. Data Subjects may request that information be presented to them in electronic form. For paper documents, this will usually mean scanning the redacted version of the document.

3. Physical Documents

Do's	Do Not's
Never redact on the original document.	
Take great care to manage copies and shred excess.	Do not make excessive copies, do not lose or keep excess copies.
Highlight text to be obscured with black highlighter and then photocopy.	Do not rely on obscuring with highlighter only as outline or indentation may still be visible.
This assumes black text if other colour ensure underlying text is obscured then copy.	
	Do not rely solely on tipex, correction rollers or similar products to obscure text.

4. Electronic Documents

Do's	Do Not's
<p>Depending on the document type there may be hidden data in many areas, name, footers, doc properties, tables, views, etc. If sending an electronic document ensure all document properties are cleansed or seek advice from IT as necessary.</p>	<p>Do not send any electronic version of documents or files to external source without checking document properties or hidden data.</p>
<p>Remember you can redact the physical copy and then scan as pdf and send electronically.</p>	
<p>Never redact on the original document.</p>	
<p>Take great care to manage copies with appropriate version control and delete excess.</p>	<p>Do not make excessive copies or store informally.</p>
	<p>Do not rely on obscuring with black background only as</p>

	removal of this will make text visible.
<p>This assumes black text if other colour ensure underlying text is obscured then copy or as an alternative to solution above, delete relevant text and then highlight blank area with black background or word “redacted” and save as temporary/redacted version.</p>	
	<p>If you have obscured text with black background only and saved a temp version ensure this is not released inadvertently later as the background can just be undone allowing visibility of text.</p>
<p>If doing a find & replace search take care to look for all combinations of data including misspellings.</p>	

It is not safe to hide information and then convert the document to PDF or Read Only as these can be cracked. You should redact as above and then convert to PDF or Read Only if necessary.	
Ensure you double check your work or consider assistance.	

5. The use of Redaction under Law

5.1. Freedom of Information

Names and contact details of individuals should not be disclosed as a matter of course.

Guidance issued by the Information Commissioner's Office (ICO), recommends not to routinely release the names and contact details of employees below the level of Head of Department or senior managers whose details are listed on the corporate structure chart.

There may be circumstances where it is appropriate to release the details of more junior employees and similarly where the names of senior managers should be redacted. For example, if employee names are in the public domain through attendance at a public meeting, then there would be no need to redact them from the published minutes.

5.2. Subject Access Requests

When dealing with the redaction of names in relation to Subject Access requests, disclosure considerations are slightly different. We should look to be as transparent as possible whilst still taking into account any conflicts of interest or confidentiality concerns.

The rights of the individuals named on documentation should be weighed against the right of access of the individual who is seeking the information and a decision made based on this.

5.3. Considerations are:

- **Information generally known by the individual making the request** - If the name of an individual or employee has previously been provided to the individual i.e. a member of staff (acting in the course of their duties), who is well

known to the individual making the request through their previous dealings.

- **Circumstances relating to the individual making the request** – If the names of the employees involved have been the ones that have made key decisions and choices in regards to the individual, it may be deemed appropriate to release their names.
- **Consent** – where there is uncertainty as to whether to disclose an employee name or not it is considered good practice to consult with affected employees to seek consent rather than applying a blanket redaction approach.

5.4. Further guidance and advice should be sought from the Data Protection Officer, if required.

6. Version Control

Version No.	Date of Change	Change made by:	Amendments
V1.0	13/07/2018	F Stankard	Published
V2.0	30/11/2021	N Connor	Reviewed & Published
V3.0	14/11/2023	N Connor	Reviewed & Published
V4.0	23/04/2026	N Connor	Reviewed & Published

