



REDACTION

GUIDELINES FOR THE EDITING OF EXEMPT INFORMATION FROM PAPER AND ELECTRONIC DOCUMENTS PRIOR TO RELEASE

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1 Purpose of this toolkit

- 1.1 This toolkit has been produced to provide guidance on the editing of exempt material from information held by public bodies. Its purpose is to promote good records management practice across the public sector and to assist in the implementation of the Freedom of Information Act. Under the Act, authorities are required to supply information to anyone that requests it unless an exemption applies, and even then, there is a further requirement, in most cases, to consider whether the public interest lies in providing the information or maintaining the exemption.

The guidance also covers the release of records for reasons other than Freedom of Information, for example under Parliamentary business or as a result of transfer to The National Archives. In some of these cases information may need to be redacted for legal or security reasons.

- 1.2 The Lord Chancellor's Code of Practice on Records Management, issued under S 46 of the FOI Act, states that where a complete document cannot be made available 'Authorities should consider whether parts of records might be released if the sensitive information were blanked out'. (Para 11.7) While this applies only to public records being transferred to record offices, it nonetheless serves as a general reminder of one of the basic features of the Act, namely the right of access is to information not records or documents.
- 1.3 The guidance covers a number of redaction methods for presentation of information in hard copy (see Appendix 1). It examines several processes, but does not recommend any overall, as it is for each authority to decide which best applies to its organisational demands and the resources it has available.
- 1.4 The guidance also provides general advice and guidance on technical issues related to the preservation and management of electronic records. It provides detailed guidance on methods for securely redacting electronic records of all types (see Appendix 2).

2 Who is this guidance for?

- 2.1 This toolkit is aimed at all authorities subject to the Freedom of Information Act (FOIA), Data Protection Act (DPA) and Environmental Information Regulations (EIR's), from central Government departments to local, police, health and education authorities.
- 2.2 If you are unsure whether your organisation is affected by FOI, a list can be found in Schedule I to the Act, which can be purchased from HMSO or seen at <http://www.hmso.gov.uk/acts/acts2000/20000036.htm>. An up to date list of bodies subject to the Act is available on the website of the Department for Constitutional Affairs at <http://www.dca.gov.uk/foi/coverage.htm>.

3 What is redaction?

- 3.1 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.

4 Principles of redaction

- 4.1 Redaction should always be reversible - it should never result in permanent removal of text. Redaction should always be carried out on copies, whether paper or electronic.
- 4.2 Redaction is carried out in order to edit exempt details from a document. It should be used when one or two individual words, a sentence or paragraph, a name, address or signature needs to be removed.
- 4.3 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.
- 4.4 When undertaking redaction, reviewers should consider whether any other factors are important for the understanding of the material. For example, if colour makes meaning clear in a paper document, a redacted colour copy should be released.
- 4.5 Redaction should be performed or overseen by staff that are knowledgeable about the records and can determine what material is exempt. If those staff identifying such material do not carry out redaction themselves, their instructions must be specific e.g. 'Memo dated ..., paragraph no..., line starting... and ending...' etc.
- 4.6 Under FOI, applicants may request that information be presented to them in electronic form. For paper documents, this will usually mean scanning the redacted version of the material. If, however, the level of resources required to do the scanning would make this unduly onerous, the FOIA allows the organisation to set aside the applicant's stated preference on the grounds of practicability (S 11). The Act also permits that a summary of the document be transcribed. If a large percentage of the document needs to be redacted, this option of summarising its contents may be worth considering as a more viable alternative to redaction.
- 4.7 Departments should bear in mind that exemption decisions will be subject to appeal. For more information, see Section VI of the Code of Practice under Section 45 of the FOI Act
<http://www.dca.gov.uk/foi/codepafunc.htm#part16>

5 Identifying material for redaction

- 5.1 All organisations should have staff able to identify information that may be exempt under the Freedom of Information Act and the Environmental Information Regulations. Ideally they should have a good knowledge of the records being reviewed for release.
- 5.2 All staff should be aware of the categories of information that should not be released under the Data Protection Act. Guidance on exemptions is available at the FOI section of the Department of Constitutional Affairs' website www.foi.gov.uk and on the website of the Office of the Information Commissioner <http://www.informationcommissioner.gov.uk/>
- 5.3 In order to conform fully with requests for information, it is essential that only exempt material be redacted. A whole sentence or paragraph should not be removed if only one or two words are non-disclosable, unless release would place the missing words in context and make their content or meaning clear.
- 5.4 Reviewers should also consider that earlier statements in a document might suggest the content of removed material. For example, if a paragraph refers to reports from overt sources, and the following paragraph refers to reports from covert sources, as well as removing the words 'covert sources', 'overt sources' would also need to be removed or the meaning of the missing words from the second paragraph could be inferred.
- 5.5 Records should also be checked for other copies of the same documents so that redaction is carried out consistently, and indexes should be checked to ensure that they do not contain details of the redacted material.

6 Keeping records of redaction work

- 6.1 Once redactions have been identified and agreed with any other interested parties, decisions need to be recorded. For some organisations, simply keeping a copy of the released copy of a document may be enough, with a note explaining the reasons for redaction.
- 6.2 If multiple requests are made for the same information, this will also show what decisions have been made in prior requests. If more detailed records of decisions are required, this can be done on a standard form recording as much of the following information as is relevant:
 - An identifying reference, registered file number, case file number or electronic document reference. This identifier can be anything that suits the organisation concerned, but must enable easy identification and retrieval of the document. The format chosen should be used consistently

- Precise details of the material removed (this need not describe the content, but should show which section of the document has been withheld e.g. paragraph 2 of page 4. However, if only one or two words are being withheld, these details will need to be exact to enable precise identification). This might be achieved by keeping a copy of the original document, with the details to be redacted highlighted, as well as the redacted version
- The reason for non-disclosure of the information. If one or more FOI exemptions apply, these should all be noted, along with the particular reasons that apply in each case
- Any comments made by reviewers and other organisations or individuals consulted

Sample forms for recording decisions can be found at Appendix 3 of this toolkit.

Once this has been done, the document can be redacted.

7 Redaction for transfer to The National Archives

- 7.1 Public record bodies transferring records to The National Archives (TNA) or a place of deposit (another archives office authorised to hold public records), whilst using the same redaction processes as for any organisation, must nevertheless bear other factors in mind.
- 7.2 There is a need for decisions to be recorded in detail and for the transferring department to be able to track and retrieve any material withheld from TNA under Section 3(4) of the Public Records Act 1958. The fact that material has been extracted will be shown on TNA's online catalogue in the form of items showing the identifying reference (but not details of the material itself) and in most cases the justification for redaction. This may increase the likelihood of an FOI request being made against it. It is therefore all the more essential that such material can be identified and retrieved.
- 7.3 Once reviewers have identified material for redaction, a record of decisions should be kept showing:
 - An identifying reference such as a National Archives reference, registered file number, case file number or electronic document reference
 - Precise details of the material removed (this need not describe the content, but should show which section of the document has been withheld e.g. paragraph 2 of page 4. However, if only one or two words are being withheld, these details will need to be exact to enable precise identification)
 - The reason for non-disclosure of the information. If one or more FOI exemptions apply, they should all be noted, along with the particular reasons they apply in this case

- The reason for withholding the information from TNA, if applicable (retention under S 3(4) of the Public Records Act), i.e. the criterion and the reason it applies
 - Any comments made by reviewers and other organisations or individuals consulted, bearing in mind that records may be the subject of further requests
- 7.4 If the reviewer passes the record on for redaction, this form can also serve as a method of conveying redaction instructions. The record of decisions should be retained until the full record is transferred to TNA or released.

Paper records

- 7.5 Once redaction has been completed, the redacted copy placed on the file should be marked to show under what authority the redaction has been effected e.g. 'Retained under S 3(4) of the Public Records Act' or 'Closed under FOI Exemption 42'. Departments redacting a significant volume of material may find it beneficial to procure stamps for this purpose. Alternatively, good quality labels showing the same information can be attached to the photocopied redacted version, providing they cannot easily be removed.
- 7.6 Redacted sheets within a larger document can be more readily identified if photocopied onto brightly coloured paper such as green or blue. This is not mandatory, but will make it clear to departmental staff using the record for administrative purposes in future that further redacted information was withheld at the time of transfer and will be available elsewhere, and makes the relevant page easier to locate at TNA when the full version is released and replaced in the original file.
- 7.7 The closed extract should be tagged into an acid-free folder with its TNA item reference clearly marked on the front e.g. DEFE 19/143/1. It should then be stored in a secure cabinet or room.

Electronic records

- 7.8 The transfer of electronic records to TNA is a subject being addressed by the Seamless Flow Programme and detailed specifications are yet to be formulated. For up to date information on the programme see: http://www.nationalarchives.gov.uk/electronicrecords/seamless_flow/default.htm

8 Transfer of closed extracts to TNA or places of deposit (unredacted originals)

- 8.1 Redactions closed under FOI exemptions should be transferred to TNA once the Lord Chancellor's Advisory Council on National Records and Archives has approved the exemptions. In the case of paper records, this should be done ideally at the same time as the transfer of the parent

piece; the extract file should be boxed separately. If this is not possible due to pending approval from the Advisory Council, the extract may remain with the department until the Advisory Council has completed its consideration of the matter.

9 Storage of retained extracts

- 9.1 Retained paper extracts should be placed in an acid-free folder and marked with their catalogue item reference as required for transfer to TNA. Departments may find it useful to attach a copy of the redacted access version for future reference. This will particularly aid FOI requests, as it will allow reviewers to see at a glance the redacted material being applied for.
- 9.2 These extract folders should then be kept in an organised system to enable easy recovery in the event of an FOI request. Examples of such systems would be to file records from each TNA class together, ordering by year and either TNA or departmental reference within that, or noting a shelf location on an extract tracking system.
- 9.3 Retained electronic (unredacted) documents must be kept in a secure area of the electronic file plan or local area network. They should be accessible only to designated staff (eg the Freedom of Information Officer and Departmental Record Officer).

10 Tracking of retained redactions

- 10.1 With the enactment of the Freedom of Information Act and the Environmental Information Regulations, public record bodies will need to know what information they hold, including what has been retained under S 3(4) of the Public Records Act. In addition to this, information needs to be easily retrievable to ensure compliance with FOI and EIR's.
- 10.2 Departments and agencies should ideally have a database or spreadsheet recording their retained paper and electronic extracts, showing some or all of the following information:
 - TNA reference of the parent piece from which the extract has been removed e.g. FO 371/148909. The extract itself should be given an item number that corresponds to TNA's Catalogue entry for the extract e.g. FO 371/148909/1
 - Former departmental file reference
 - Reason for retention
 - Date for re-review
- 10.3 In order to answer requests for information efficiently, a brief description of the extract's subject matter on which a keyword search can be conducted may also provide an effective aid to locating relevant records. Records managers should be aware that records of redaction decisions are likely to be the subject of FOI requests themselves, and

as such, should word these descriptions carefully. However, the essential aspect of this is that the details must allow the information to be located and retrieved. If a request for these records is made, exemptions can be applied to them if necessary.

- 10.4 Databases and spreadsheets need to have a facility to show all re-review dates as they become current. For example, if a consistent method of recording re-review dates is used, an Excel spreadsheet filter can show due dates on a monthly or annual basis, or a simple ascending chronological sort will show the next files due for re-review in order. This type of tracking system can also serve as a reminder for departmental re-review of closed material held by TNA. When setting re-review dates, departments should bear in mind that some exemptions are time limited.

11 Further information

- 11.1 More information is available by contacting the Records Management Department at TNA. The links within this guidance will also provide further suggestions. You may also find the following helpful:

http://www.nationalarchives.gov.uk/recordsmanagement/advice/pdf/sta_n_for_transfer.pdf Preparation of records for transfer to The National Archives and approved places of deposit

http://www.nationalarchives.gov.uk/recordsmanagement/advice/pdf/cat_editorial.pdf Cataloguing Guidelines Ed 98-101

http://www.nationalarchives.gov.uk/recordsmanagement/advice/pdf/sched_complaints.pdf Retention Scheduling 7 - Complaints Records

Annex A to the Lord Chancellor's Code of Practice on Records Management

ISO 15489 Part 2 – The International Standard on Records Management Guidelines: Section 4 on Records Processes and Controls

Appendix 1

Redaction of documents in hard copy

- 1 Redaction **must always** be carried out on a copy, leaving all the information contained in the original document intact.
- 2 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, cost and time available. However, whichever method is employed, the end result must ensure that the redacted material cannot be seen or guessed due to incomplete redaction. This means being 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.

Methods of redaction

- 3 **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" for a 10-12 font typewritten line, 1/3" for two typewritten lines and 1" for general corrections.
- 4 **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.

- 5 **Scalpel.** This is perhaps the most precise and secure method of redaction as the exempt material is physically removed, leaving no risk of text being visible in the released version. A photocopy of the original is made. The material to be redacted is then cut from this photocopy using an artist's scalpel or similar tool, leaving a 'doily', which is then photocopied again to provide the redacted document.
- 6 **Photocopier with redaction facilities.** Photocopiers are available which, in addition to normal copying functions, also have facilities to automatically remove marked out areas on a document. 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. 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.

Appendix 2

Redaction of electronic records

- 1 The following discusses the technical aspects of redacting electronic records. It should be remembered that when dealing with electronic records the general principles of redaction are the same as those described in section 4 of this document.

Issues in redacting electronic records

- 2 The redaction of born-digital records is a relatively new area of records management practice, and raises unique issues and potential risks.
- 3 The simplest type of electronic record to redact is a plain text file, in which there is a one to one correspondence between bytes and displayable characters. Because of this direct correspondence, redacting these formats is simply a matter of deleting the displayed information - once the file is saved, the deleted information cannot be recovered.
- 4 However, the majority of electronic records created using office systems, such as Microsoft Office, are stored in proprietary, binary-encoded formats. Binary formats do not have this simple and direct correlation, and may contain significant information which is not displayed to the user, and the presence of which may therefore not be apparent. They may incorporate change histories, audit trails, or embedded metadata, by means of which deleted information can be recovered, or simple redaction processes otherwise circumvented. These formats are also usually the property of the software house which develops them, and these companies have typically regarded providing public documentation of these formats as against their commercial interests. As such, the mechanisms by which information is stored within these formats are often poorly understood. In addition, cryptographic and semantic analysis techniques can potentially be used to identify redacted information.
- 5 It is therefore essential that any redaction technique is secured to eliminate the possibility of redacted information being recovered.

Approaches to redaction

- 6 The redaction of electronic records should always be carried out in accordance with the following principles:
 - 6.1 The original or master version of an electronic record must never be redacted – redaction must always be carried out on a new copy of the record, either in paper or electronic format.

- 6.2 Redaction must irreversibly remove the required information from the redacted copy of the record. The information must be completely removed from the bit stream, not simply from the displayable record.
 - 6.3 Redaction should always be carried out using methods which have been fully security tested, such as those recommended by TNA.
 - 6.4 Electronic redaction should be carried out in a controlled and secure environment that provides access only to those trained and authorised to carry out redaction.
 - 6.5 All intermediary stages of the redaction process should be deleted. Only the original record and the appropriately redacted copy should be retained.
- 7 A number of different approaches to electronic redaction are possible:

7.1 Traditional redaction

For electronic records, which can be printed as a hardcopy, traditional redaction techniques, as described in Appendix 1, 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, such as Adobe Portable Document Format.

This is one approach currently recommended by TNA.

7.2 Format redaction

Records may be redacted electronically in their original format. This may be carried out either using deletion tools within the creating software, or by using specialised redaction software. This approach must be treated with extreme caution, due to the possibility that deleted information may still be recoverable, and the potential for information to remain hidden within non-displayable portions of the bit stream.

TNA is testing a range of methods and formats, but does not currently recommend this approach.

7.3 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.

TNA is testing a range of methods and formats, but does not currently recommend this approach for most records. (An exception for single page documents is described below).

7.4 Roundtrip redaction

The redacted record may be required to be made available in its original format, for example, to preserve complex formatting. In such cases, an extension of the conversion approach may be applicable. Roundtripping entails the conversion of the record to another format, followed by conversion back to the original format, such that the conversion process removes all evidence of the redacted information. Information deletion may be carried out either prior to conversion, or in the intermediary format.

This approach requires a thorough understanding of the formats and conversion processes involved, and the mechanisms by which information is transferred during conversion.

This is one approach currently recommended by TNA.

Current best practice

8 This section describes the redaction methods, which have been tested by TNA and are currently recommended for use with specific types of electronic record.

9 **Electronically redacting documents**

9.1 When redacting electronically, great care must be taken over the choice of target format. It is crucial that no evidence of redacted information is retained in a redacted copy. Some binary formats may allow changes to be rolled back; consequently these formats should not be used for creating redacted copies.

TNA recommends using PDF as a format for redacted copies, but PDF files should be roundtripped via a simple image format to ensure that all evidence of previously redacted information is removed. The recommended image format, Windows Bitmap (BMP), has been chosen because it contains no provision for storing metadata. There is therefore no means by which hidden information could be inserted into the image file. This format has been preferred over other image formats such as TIFF for this reason. The TIFF format contains metadata not visible on screen and TNA technical staff have not yet tested the metadata

structure of TIFF sufficiently to recommend its use with confidence.

9.2 Redacting office documents

This guidance applies to word-processed documents, including documents created using all versions of Microsoft Word, WordPerfect and OpenOffice Writer, and to spreadsheets, including those created using all versions of Microsoft Excel, Lotus 1-2-3, and OpenOffice Calc.

Office documents should be electronically redacted using the following steps:

- An electronic copy is made and information is redacted by deleting all restricted information and replacing it with the text string “[redacted]”, so that redaction is apparent but the space cannot be used to identify the missing information
- The redacted document is then ‘printed to PDF’ using PDF creation software such as Adobe Acrobat
- The resulting PDF file is roundtripped via the BMP image format as described below. If the redacted document is no more than a single page, users may prefer to leave the document as a bitmap image

9.3 Redacting PDF documents

Documents already in PDF format should be redacted using the following steps:

- An electronic copy is made and this copy is opened in Adobe Acrobat (the full version, not Adobe Acrobat Reader). For PDF documents where the text is stored as text, the Text Touch-UP tool can be used in Adobe Acrobat to replace the redacted text with a redaction marker (e.g. ‘[redacted]’). However, for PDF documents where the text is stored as an image, the Text Touch-Up tool can’t be used. In these cases, and for graphics and images, use The Square Tool to redact this PDF by drawing black rectangles over text and images
- The resulting PDF file should be roundtripped via the BMP image format as described below. If the redacted document is no more than a single page, users may prefer to leave the document as a bitmap image. However, TNA does not recommend BMP as a long-term preservation format

9.4 Roundtripping

The following steps should be taken:

- Convert the PDF file into a set of bitmap images (BMP files), one for each page of the document. Widely available graphics software (e.g. Adobe Photoshop Elements) can be used to perform this step
- Convert each of these image files back into a PDF file. Widely available graphics software (e.g. Adobe Photoshop Elements) can be used to perform this step
- Recombine the individual page PDF files to form a PDF containing all of the pages of the original document. Specialised software may be required to concatenate the individual PDF files – for example, [Ghostsript](#), a PDF-manipulation tool that is free to download

In cases where large numbers of electronic documents need to be redacted, these steps can be automated by writing a programming script.

10 Conventional redaction methods

In some circumstances, it may be preferable to redact an office document by traditional methods, rather than electronically.

10.1 Word-processed documents

This guidance applies to word-processed documents in general, including documents created using all versions of Microsoft Word, WordPerfect and OpenOffice Writer.

Documents should be redacted using the following steps:

Either:

- The document should be printed to paper
- The paper copy should be redacted using conventional methods for redacting paper records
- If an electronic version of the redacted document is required, this should be created by scanning the redacted paper copy into an appropriate format, such as Adobe Portable Document Format

Or

- An electronic copy is made, this copy is redacted by deleting all restricted information and replacing it with the text string “[redacted]”, so that redaction is apparent but the space cannot be used to identify the missing information
- The redacted document is then printed to paper
- If an electronic version of the redacted document is required, this should be created by scanning the redacted paper copy into an appropriate format, such as Adobe Portable Document Format

10.2 Spreadsheets

This guidance applies to spreadsheets in general, including those created using all versions of Microsoft Excel, Lotus 1-2-3, and OpenOffice Calc.

Spreadsheets should be redacted using the following steps:

Either:

- The required portion of the spreadsheet should be printed to paper
- The paper copy should be redacted using conventional methods for redacting paper records
- If an electronic version of the redacted spreadsheet is required, this should be created by scanning the redacted paper copy into an appropriate format, such as Adobe Portable Document Format

Or:

- An electronic copy is made and this copy is redacted by deleting all restricted information and replacing it with the text string “[redacted]”, so that redaction is apparent but the space cannot be used to identify the missing information
- The redacted document is then printed to paper
- If an electronic version of the redacted document is required, this should be created by scanning the redacted paper copy into an appropriate format, such as Adobe Portable Document Format

- 11 When redacting electronic formats, a record of decisions should be kept in the same way as with paper formats. See section 6.

- 12 The redacted version of the record should be saved into an electronic records management system (ERMS) at the time of creation. This will automatically record the identity of the individual saving the document as well as the time and date. Recording the reason for redaction needs to be input manually.
- 13 Some ERMS solutions offer additional functionality whereby it is possible to create a rendition, which is a related instance of the original document. The rendition can be redacted and saved within the ERMS and its relationship to the original document will be recorded by the ERMS.

Appendix 3

Sample of simple form for recording redaction decisions

Date of redaction	Document reference	Details of exempt material	Exemption applied	Justification for exemption	Reviewer's comments	Any other comment

Example of form to record decisions and pass on information to document editors carrying out redaction

Editing requirements: Series _____ Piece _____

Folio	Paragraph	Line	From (inclusive)	To (inclusive)