



## SHENSTONE PARISH COUNCIL REDACTION POLICY

### 1. Purpose

Shenstone Parish Council is committed to upholding the highest standards of data protection and confidentiality. This policy ensures compliance with:

- **UK General Data Protection Regulation (UK GDPR):** Governs how personal data must be processed in the UK post-Brexit. It is the retained and adapted version of the EU GDPR.
- **Data Protection Act 2018 (DPA 2018):** The UK's primary data protection statute, which supplements and tailors the UK GDPR. It provides exemptions, enforcement powers, and additional rules (e.g. for law enforcement and intelligence services).
- **Freedom of Information Act 2000 (FOIA):** Gives the public the right to access recorded information held by public authorities, subject to exemptions.

It outlines the procedures the Council must follow when redacting information from documents in response to:

- Subject Access Requests (SARs)
- Freedom of Information (FOI) requests
- Environmental Information Regulations (EIR) requests
- General publication of council materials (e.g. minutes, reports)

### 2. Principles of Redaction

Redaction refers to the permanent removal or obscuring of sensitive or exempt information prior to disclosure or publication.

Shenstone Parish Council will redact:

- Personal data where disclosure would contravene data protection legislation
  - Information exempt under FOI (e.g. confidential, commercially sensitive, or security-related content)
  - Third-party personal data unless lawful consent or another valid basis exists
- All redacted content must be irretrievable and inaccessible to recipients or the public.

### 3. Legal and Regulatory Framework

This policy is governed by the following legislation:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Freedom of Information Act 2000

Responses to SARs must respect the rights of individuals under UK GDPR. FOI and EIR requests will be processed in accordance with statutory obligations, including the application of relevant exemptions or exceptions.

#### 4. Redaction Process

The redaction process must ensure:

- Irreversible removal of redacted content
- Preservation of document clarity and context
- Consistency and justification for all redactions

Step-by-step procedure:

1. Review the document to identify personal or exempt information
2. Mark content for redaction in Microsoft Word using internal highlighting or comments
3. Convert the document to PDF using approved software
4. Use Adobe Acrobat's Redaction Tool to:
  - Permanently remove identified content
  - Apply black boxes over redacted areas
  - Remove metadata and hidden text

⚠ Redaction must not be performed using basic tools such as strikethroughs, shapes, highlights, or simple PDF markups. These methods are insecure and do not permanently remove data.

5. Save the redacted PDF as the official version for release or publication
6. Verify that redactions are secure and irreversible
7. Retain the unredacted version securely for internal use, clearly marked as restricted

#### 5. Approval and Record Keeping

All redacted documents must be:

- Reviewed and approved by the Clerk, Deputy Clerk, or appointed Data Protection Officer
- Retained in line with Shenstone Parish Council's Document Retention Policy

#### 6. Training and Responsibilities

Staff and councillors involved in handling SARs, FOI/EIR requests, or document publication will receive regular training on:

- Data protection principles
- Use of Adobe Acrobat redaction tools
- Legal exemptions and best practices in redaction

The Clerk or designated officer is responsible for ensuring compliance and maintaining appropriate records.

#### 7. Policy Review

This policy will be reviewed annually or sooner if legislative changes require it.

#### 8. Document History.

Version	Summary	Date
Draft A	Initial draft based on best practice of other Parish Councils.	15 Sep 25.
Issue 1	Approved Full Council	14 Oct 25.