



Draft Redaction Policy 2026

1. Introduction

Last reviewed: April 2026

- 1.1 The Council is committed to transparency and openness in line with the Freedom of Information Act 2000, the Environmental Information Regulations 2004 and the Local Government Transparency Code 2015. Where information is exempt under data protection legislation, the common law duty of confidentiality or other legal obligations, it will be redacted or withheld prior to publication or disclosure.
- 1.2 This policy provides a clear, consistent approach to redaction across the Council. It protects personal and confidential information while enabling lawful disclosure.
- 1.3 The policy applies to all information published or disclosed by the Council (including on the website), all staff involved in publishing or disclosing documents, and all formats (hard copy and electronic). It covers personal data relating to living individuals and information subject to a duty of confidentiality.

2. Roles and Responsibilities

- 2.1 All staff responsible for publishing or disclosing information must receive training on redaction requirements, procedures and the use of approved software.
- 2.2 ICT will provide approved redaction software (currently Qoppa) to relevant staff. At least two licences per team are recommended.
- 2.3 The Information & Engagement team will provide advice and guidance, carry out redaction for FOI, EIR and SAR responses, and lead annual policy reviews.

3. What is Redaction?

Redaction is the term used to describe the editing process whereby information is removed from a document. This is done by blocking out individual words, a signature, sentence, paragraph or section, prior to the disclosure of information or a document.

4. Legal and Regulatory Requirements

4.1 The Council will comply with all relevant legislation, including:

- Common Law Duty of Confidentiality
- Data Protection Act 2018 (DPA)
- UK GDPR
- Environmental Information Regulations 2004 (EIR)
- Freedom of Information Act 2000 (FOIA).

4.2 Under UK GDPR, processing of personal data requires a lawful basis (Article 6) and, for special category or criminal offence data, an additional condition (Article 9).

4.3 Under FOIA and EIR, information must be disclosed unless an exemption applies. Where an exemption is engaged, the Information & Engagement team will conduct and document a public interest test.

4.4 An entire document may only be withheld if all information is exempt or redaction would render it meaningless. Staff must refer to the latest ICO guidance on “Disclosing documents to the public securely”.

5. Identifying Information for Redaction

5.1 The personal data of living individuals is protected under data protection legislation and must be redacted or withheld except in the circumstances set out in the Redaction Criteria table (Section 8).

5.2 Wherever the Council owes a duty of confidentiality, that information must be redacted or withheld except in the circumstances set out in the Redaction Criteria table. A public interest test may be required before withholding.

5.3 The Council may use its discretion to redact any comments or information considered derogatory or offensive. Publishing such comments (e.g. in planning representations) does not imply Council endorsement.

5.4 Staff must consult the Redaction Criteria table before publishing or disclosing any document.

6. Exceptions to Redaction

6.1 There are exceptions which permit personal data to be made available to the public, under Schedule 2, paragraph 5 of the Data Protection Act 2018, where disclosure of the data is required by an enactment. Significantly for the Council (as a planning authority), these exceptions include the names and addresses of planning applicants, as required under section 69 of the Town and Country Planning Act 1990.

6.2 In addition, there may be exceptional circumstances when personal information is not required to be redacted, which could relate to Planning or Governance criterions. This basis can also apply to senior officers, acting in their capacity of granting official or legal permissions. The Council will only publish personal information that is necessary and may include:

- Names, signatures and contact details of senior managers of Bolsover District Council (Deputy and Assistant Director and above) or other authorised signatories acting in their official capacity on behalf of the Council; and
- Names, signatures and contact details of senior third-party representatives (where it is clear they occupy a senior position), acting in their official capacity on behalf of their organisations.

6.3 There may be instances where third parties request that we publish personal information, to promote an initiative, for example, individuals representing an

allotment association. In which case, we will obtain and record an individual's written consent prior to publishing. The individual may withdraw their consent at any time, in which case their personal information will be removed immediately from the website.

6.4 There shall be a presumption that all information and documents provided by the Council to the Local Government Ombudsman and Social Care Ombudsman for the purpose of an investigation of a referred complaint will be provided in an unredacted form.

7. Undertaking Redaction

7.1 Redaction must only be carried out on a copy of the document. The original must be retained in accordance with the Retention Schedule.

7.2 Appropriate methods must be used to ensure redacted information cannot be recovered or inferred (including when the document is held to the light).

7.3 Redaction software (Qoppa or approved alternative) must be used correctly to produce irreversible redactions. All metadata, tracked changes, comments, hidden data and previous versions must be removed before publication.

7.4 Black highlighting must be used on white or pale backgrounds. White redaction must be avoided.

7.5 A two-person check process is **mandatory**: every redacted document must be reviewed and approved by a second person or line manager before publication or disclosure.

7.6 Whole sentences or paragraphs must not be removed unless necessary to protect the remaining text from revealing the redacted content. If heavy redaction renders a document meaningless, the entire document must be withheld.

7.7 Redactions must be consistent and logical throughout the document.

7.8 Information supplied to the Information & Engagement team for FOI, EIR or SAR responses must be provided unredacted; the team will apply all necessary redactions.

8. Redaction Criteria

We will seek to apply the following redaction criteria across the Council to protect personal and confidential information against unauthorised disclosure and to disclose relevant information appropriately and lawfully. It should be noted that under FOIA and EIR, some of the information categories below may be subject to an exemption and public interest test.

Information type	Details/examples	Reasons for redaction	Relevant legislation/exemption	Exceptions to redaction
Bank account details	Of individuals	Personal information	DPA 2018 / UK GDPR Art 5 & 6; FOIA s.40	Data subject exercising their own right of access
Bank account details	Of businesses/commercial information	Confidential/commercial information	Common law; FOIA s.41; FOIA s.43	None
Details of contractual arrangements	With external providers	Confidential information	Common law; FOIA s.41; FOIA s.43	None
Criminal offence data	Any information in connection with an offence	Personal information	DPA 2018 / UK GDPR Art 10; FOIA s.40	Data subject exercising their own right of access
Date of birth	Including day, month or year or any combination	Personal information	DPA 2018 / UK GDPR Art 5 & 6; FOIA s.40	Data subject exercising their own right of access
Home address	All lines of an individual's home address, including postcode	Personal information	DPA 2018 / UK GDPR Art 5 & 6; FOIA s.40	• Home addresses of planning applicants (TCPA 1990 s.69 registers) • Data subject exercising their own right of access
Legal communications	Information relating to legal proceedings	Confidential information	Common law; FOIA s.41; FOIA s.42	None

Name	All first, middle and last names and nicknames.	Personal information	DPA 2018 / UK GDPR Art 5 & 6; FOIA s.40	<ul style="list-style-type: none"> Names of planning applicants Licensees on Licensing registers Data subject exercising their own right of access Senior Bolsover District Council staff (Deputy and Assistant Directors and above) and authorised signatories Senior third-party representatives acting in official capacity Names of junior officers in published minutes of public meetings
Personal email addresses	Also, any part of a business email address that includes an individual's name.	Personal information	DPA 2018 / UK GDPR Art 5 & 6; FOIA s.40	<ul style="list-style-type: none"> Data subject exercising their own right of access Senior Bolsover District Council staff (Deputy and Assistant Directors and above) and authorised signatories Senior third-party representatives acting in official capacity
Personal telephone numbers	Including landline and mobile	Personal information	DPA 2018 / UK GDPR Art 5 & 6; FOIA s.40	Data subject exercising their own right of access
Pronouns/Title	In relation to redacted names	Personal information (to prevent inference)	DPA 2018 / UK GDPR Art 5 & 6; FOIA s.40	Relating to senior staff or senior third-party

	(her/his, he/she), Ms/Mrs/Miss/Mr, etc.			representatives acting in official capacity
Protected species and their sites	Information from Environmental Impact Assessments (EIAs) or similar planning documents	Protected species information	EIR reg 12(5)(g); Wildlife & Countryside Act 1981	Planning inspection (where required)
Sensitive personal information (special category)	Racial or ethnic origin, political opinions, religious beliefs, trade union membership, biometric data, etc.	Special category personal information	DPA 2018 / UK GDPR Art 9; FOIA s.40	Data subject exercising their own right of access
Signatures	Handwritten and electronic	Personal information	DPA 2018 / UK GDPR Art 5 & 6; FOIA s.40	Data subject exercising their own right of access • Senior Bolsover District Council staff (Deputy and Assistant Directors and above) and authorised signatories • Senior third-party representatives acting in official capacity

9. Compliance

9.1 All staff responsible for publishing and disclosing information and documents must comply with this Redaction Policy.

9.2 Failure to comply with this Redaction Policy may result in financial loss or reputational harm to individuals, businesses, organisations and the Council.

10. Review

This policy will be reviewed at least annually by the Information & Engagement Manager and the Council's SIRO, or sooner if there is a significant change in legislation or ICO guidance.

11. Related Policies

This policy must be read in conjunction with the Council's Data Protection Policy and all other relevant/associated policies.

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