



Ministry
of Defence

Ministry of Defence
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E-mail: CIO-FOI@mod.gov.uk

Ref: FOI2022/03700

Yijun Chen
[request-845172-4486f25b@whatdotheyknow.com](#)

14 April 2022

Dear Mr Chen,

Freedom Of Information Request

1. Thank you for your email of 17 March 2022 requesting the following information:

- “1. Copies of any business process, manual, procedure or policy concerning document redaction in your organization.***
- 2. If recorded, please indicate the FTE (staff time) spent on document redaction by your organization per year. I am only interested in the most recent figure for this.***
- 3. If recorded, please provide the expenditure on document redaction per year. Again, I am only interested in the most recent figure for this.***
- 4. If recorded, please provide any estimates on how much document redaction is undertaken by your organization (e.g., number of documents / pages of material).***
- 5. Please indicate any software currently used for document redaction (e.g., Adobe Acrobat Pro).***
- 6. Do you use specialist staff who have undergone specific training to undertake document redaction? If so, please indicate the specific training and/or qualifications for these staff.”***

2. I am treating your correspondence as a request for information under the Freedom of Information Act 2000 (FOIA).

3. A search for the information has now been completed within the Ministry of Defence (MOD), and I can confirm that some information in scope of your request is held.

4. Please see below for the information you have requested:

- “1. Copies of any business process, manual, procedure or policy concerning document redaction in your organization.”***

Please see [Annex A](#) for extract taken from the Departments policy relating to redaction.

- “2. If recorded, please indicate the FTE (staff time) spent on document redaction by your organization per year. I am only interested in the most recent figure for this.”***

No recorded information held by the Department.

“3. If recorded, please provide the expenditure on document redaction per year. Again, I am only interested in the most recent figure for this.”

No recorded information held by the Department.

“4. If recorded, please provide any estimates on how much document redaction is undertaken by your organization (e.g., number of documents / pages of material).”

No recorded information held by the Department.

“5. Please indicate any software currently used for document redaction (e.g., Adobe Acrobat Pro).”

No information is held. There are various ways, including software applications and physical methods (see para 5. TNA Toolkit), which may be used to identify and highlight the information to be redacted. The method used to highlight the information will be different depending on the local processes, e.g. this can range from using Microsoft word, PDF, manual redaction using tape or marker pens. However, the recorded information held in relation to MOD policy on redaction, provided at Annex A specifically states: **REDACTION SOFTWARE IS NOT TO BE USED, ALL INFORMATION MUST BE SCANNED.**

Please note this is MOD policy, there may be exceptional circumstances when this policy is not followed.

It is also worth noting that the FOI code of practice here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744071/CoP_FOI_Code_of_Practice_-_Minor_Amendments_20180926 .pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/744071/CoP_FOI_Code_of_Practice_-_Minor_Amendments_20180926.pdf)

The Code of practice states at 1.6: *The Act provides a right to information. Disclosing existing documents will often be the most straightforward way of providing information. However, in other cases it may be appropriate to extract the relevant information for disclosure and put in a single document rather than redact the existing document that contains it.*

“6. Do you use specialist staff who have undergone specific training to undertake document redaction? If so, please indicate the specific training and/or qualifications for these staff.”

No recorded information held by the Department.

Section 16 (Advice and Assistance)

5. The National Archives have published a Redaction Toolkit – this is the authoritative document for all redaction work across Government. Please see following link for more details:

https://cdn.nationalarchives.gov.uk/documents/information-management/redaction_toolkit.pdf

You may find it helpful to note for question 5,

6. If you have any queries regarding the content of this letter, please contact this office in the first instance.

7. If you wish to complain about the handling of your request, or the content of this response, you can request an independent internal review by contacting the Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.gov.uk). Please note that any request for an internal review should be made within 40 working days of the date of this response.

8. If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the MOD internal review process has been completed. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at <https://ico.org.uk/>.

Yours sincerely,

Mr Paul Daly
Assistant Head – Information Rights Team

Background

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.

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 National Archives have published a [Redaction Toolkit](#) – this is the authoritative document for all redaction work across Government. The lead department in the MOD is ISS Information Rights.

Why is this important?


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 unintentional 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.

What rules must I follow to do this?

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.

Hard copy information

Information to be withheld should be covered with redaction tape (this can be purchased through your i-hub and comes in a roll a bit like Tippex 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.

Where a Scanning Facility is not available

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.

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 little information left after redaction it may make

sense to provide a summary of the disclosable information instead of providing a redacted document.