Police Instructions

Electronic redaction and disclosure

Table of Contents

Policy statement and principles

What

This chapter sets out the steps for electronically redacting information from documents to be disclosed by Police. It applies to all employees involved in the generation, maintenance, and disclosure of Police documents.

Why

Disclosure of information is a vital part of the criminal justice process. Those completing disclosure of documents must strictly apply the rules and processes described in this chapter to ensure that information is not inappropriately disclosed. The only acceptable format for electronic disclosure of any document is a sanitised PDF. This ensures any 'hidden data' contained within a document is not recoverable by a recipient post disclosure. Additional measures are required for documents requiring redaction and particular care must be taken with documents that contain sensitive information.

How

Police employees will:

- never disclose sensitive or informant information in its original electronic format

- use Adobe Acrobat Pro DC (or a later version) when permanently redacting text and images from PDF files

- have their supervisor confirm that any electronic disclosure complies with the instructions in this chapter to prevent compromising the confidentiality of information

- understand that any disclosure not complying with Police policy and jeopardising Police security or an individual's personal safety and privacy may be referred for employment investigation and may amount to serious misconduct.

This document was current as at 2 May 2022. Police policies are regularly reviewed and updated.
The most current version of Police policies are available from www.police.govt.nz

4/10

Overview

Introduction

Disclosure of information is a vital part of the criminal justice process. In the case of major and serious crime it can be a labour-intensive task, often completed at the end of months of investigation. Because of the volume of correspondence, electronic disclosure of documents is a more efficient method of disclosing the file to interested parties (often multiple lawyers) than disclosure in paper form. In general, except for small files or some specific information, electronic disclosure is Police's favoured method of disclosure.

Electronic redaction

The process of withholding/removing specific parts from information being disclosed or exchanged as part of Police business or operations is called 'redaction'. When performed on electronic documents and information, it is called 'electronic redaction'. Information that is initially marked for removal from a document is shown in a red outline. Information subsequently removed from a document by redaction is indicated by a black box (i.e. the outline has been filled in).

In addition to regular text and images in a document, other non-visible data that Police does not want disclosed will be present in the background of the electronic file, including metadata, deletions and redactions. If the sanitisation procedure is not done while applying redactions, this material may be available to a computer savvy individual to whom electronic documents have been disclosed, or to someone to whom they may forward the material.

Note: Adobe Acrobat Pro DC should sanitise a document by default when you apply redactions, but in some cases this auto function could be deactivated. Always check that you have sanitised the document before disclosing it.

Compliance with electronic redaction instructions

All employees must comply with the electronic redaction instructions detailed in this chapter. It is critical that supervisors of employees who are making electronic redactions ensure the disclosure complies with these instructions to prevent compromising the confidentiality of information.

Unauthorised disclosures due to failure to comply with the instructions in this chapter can have serious consequences, including:

- legal and financial penalties for significant breaches of confidentiality or privacy
- placing law enforcement processes, such as prosecutions, at risk
- putting members of the public and Police employees at risk (including the potential for disciplinary investigations of employees)
- reputational damage to Police, and erosion of public confidence in Police.

The following methods of redaction **must NOT** be used in any circumstances:

- redaction of a document by electronically highlighting text in black (i.e. in Word or any software other than Adobe Acrobat Pro DC)

This document was current as at 2 May 2022. Police policies are regularly reviewed and updated.
The most current version of Police policies are available from www.police.govt.nz
5/10

- redaction of a hardcopy document using a marker pen and photocopier.

Approved electronic redaction software

Adobe Acrobat Pro DC (or a later version) must be used for all cases of electronic redaction - it is the minimum approved redaction software for New Zealand Police. Licences are allocated per device, and they should be managed by District to ensure access at frequently used terminals.

To obtain Adobe Acrobat Pro DC (or a later version), follow this standard software request procedure.

Step	Action
1	Open a hardware/software web form on the Police Service Now portal.
2	Follow the form's instructions to submit the request electronically. If further help is required, contact the Helpdesk
3	Obtain sign-off for this form from your supervisor. If a new software license cost is being incurred, the form must also be signed by the requestor's District Business Service Manager and ICT.

Further information

This chapter is about how to create an electronic file for disclosure. It does not cover guidance on what information should be disclosed, what can be withheld, and if redaction is required. For guidance on these things before you prepare a file for disclosure, see:

- Disclosure under the Official Information Act 1982 (OIA)
- 'Criminal disclosure' for disclosure under the Criminal Disclosure Act 2008
- 'Police Human Sources information in warrants/orders and disclosure'
- 'Privacy and official information' for releases under the Official Information Act 1982 and the Privacy Act 2020.

This document was current as at 2 May 2022. Police policies are regularly reviewed and updated.
The most current version of Police policies are available from www.police.govt.nz
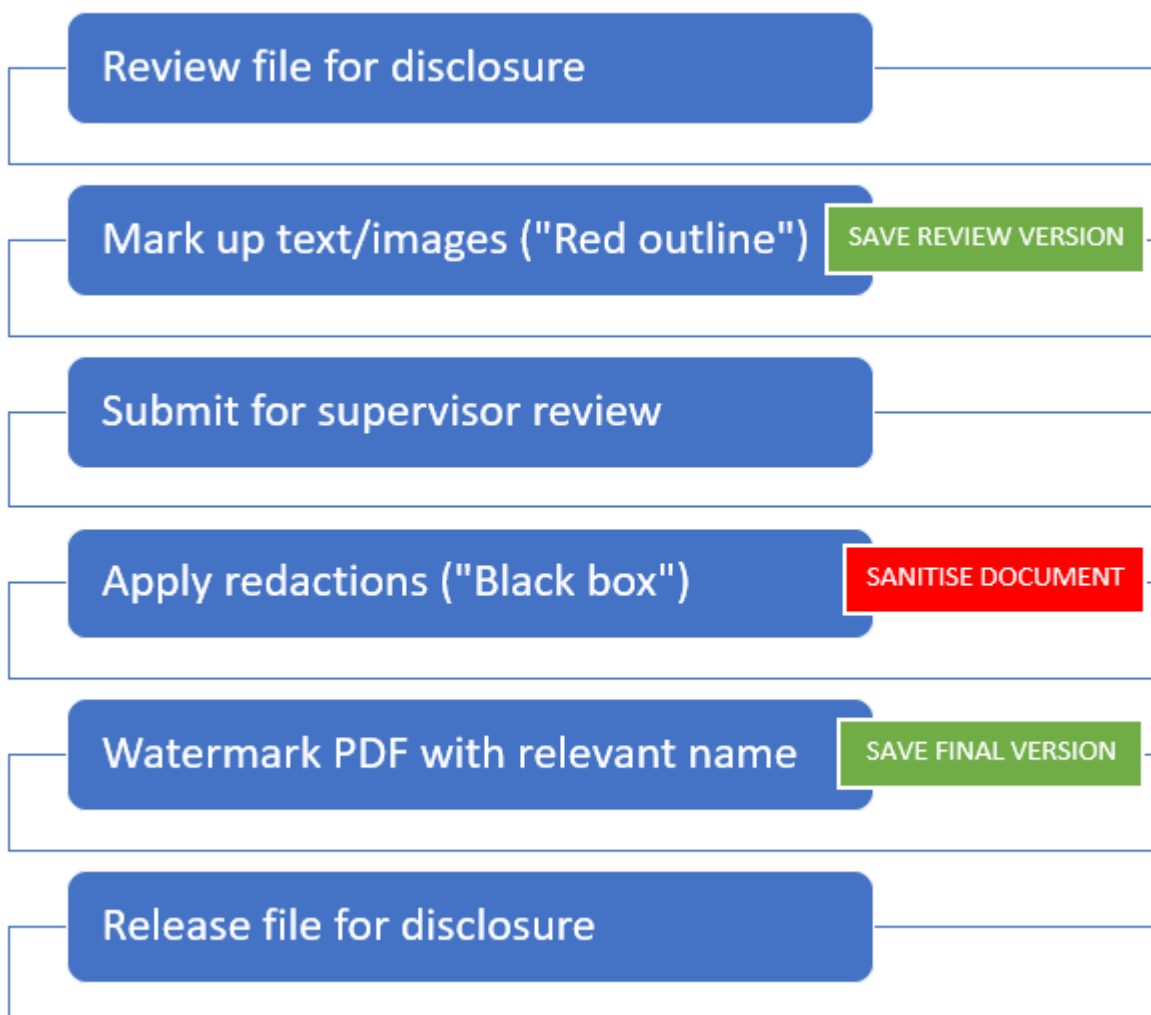6/10

Creating an electronic file for disclosure

Common scenarios at Police where files may need to be redacted before being disclosed include:

- criminal disclosure
- Privacy Act requests
- Official Information Act requests
- proactive disclosure (website; media releases)
- sharing information internally with a need to restrict some source data.

Note: this chapter covers the general process for redaction. More detailed processes for creating and releasing electronic files for disclosure for criminal disclosure are covered in more depth in the [Criminal disclosure](#) chapter, and must be followed.

Quick glance process

Below is a simple visual guide to electronically redacting and disclosing Police documents.

Review file for disclosure

Mark up text/images ("Red outline")   SAVE REVIEW VERSION

Submit for supervisor review

Apply redactions ("Black box")   SANITISE DOCUMENT

Watermark PDF with relevant name   SAVE FINAL VERSION

Release file for disclosure

Detailed process

This document was current as at 2 May 2022. Police policies are regularly reviewed and updated.
The most current version of Police policies are available from www.police.govt.nz

7/10

When electronically redacting files for disclosure, follow these more detailed steps.

	Task	'How to' steps
1	**Collate the relevant information to be disclosed.** The source documents may be in various formats to begin with, such as Word, Excel, PowerPoint, etc.	If necessary, convert the original electronic file(s) to PDF: - right click on the file(s). - Click 'Convert to Adobe PDF'. - Select a save location and name the file. - Click Save.
2	**Review the file for any information to be withheld.** Ensure you review the file according to the type of disclosure it is.	For detailed guidance on how to review files for disclosure, see: - [Reviewing for criminal disclosure](#) - [Reviewing for OIA or privacy requests](#)
3	**Electronically mark ("red outline") the sensitive information for redaction.**	- Open the PDF in Adobe Acrobat Pro DC. - Click "Tools". - Find and click the "Redact" icon. - Click, hold and drag your cursor over any text you want to redact. It will be marked for redaction by a red outline. - To mark an image for redaction, simply click on the image.
	Note: If the document does not require any redactions, it still must be **sanitised** before being disclosed. To do this, follow the step at right.	- Click "Tools". - Find and click the "Redact" icon. - Click "Sanitise document". - Click "OK". - Clearly name your file as "SANITISED" e.g. "SMITH 20110902 Disclosure pgs 1-50_SANITISED." - Proceed to step 6.
4	**Select the grounds for redaction for each marked up section.** If you are unfamiliar with the various grounds for withholding information, there is a good overview [here](#).	- Right click on the marked-up text or image (each red outline). - Hover over "New Zealand Police" at the bottom of the pop-up box. - Choose and click on whichever ground of the relevant Act you are redacting the information under.

This document was current as at 2 May 2022. Police policies are regularly reviewed and updated.
The most current version of Police policies are available from www.police.govt.nz

8/10

5	**Save a copy of the marked up ("red outline") version.**	It is useful for a reviewer to see this "red outline" version instead of having to compare two documents (the unmarked original alongside a redacted "black box" version). - Clearly name your file as "marked up red outline", e.g. "SMITH 20110902 Disclosure pgs 1-50_marked up red outline."
6	**Submit the marked up ("red outline") file to a supervisor(s) for review.**	**IMPORTANT:** For criminal disclosure, ensure you closely follow the appropriate review steps and get the required sign-offs.
7	**Make any changes to the document required by the reviewer.** **IMPORTANT:** If there are still no redactions necessary in the document after the review, skip to step 9.	If required, this may include altering red outline sections or adding new ones, etc. If you make changes, have them checked and approved by the reviewer before proceeding to the next step. Save the document again to ensure it will match the final redacted version.
8	**Permanently redact ("black out") the marked information and sanitise the doc.** Once any information is blacked out, it cannot be undone.	- Use the saved 'red outline' version of the document. - Click the "Apply" button at top right to permanently redact the marked content. - A box will appear, asking if you wish to also sanitize and remove hidden information in the document. **Ensure this is activated (slider is blue)** - Click "OK".
9	**Save a copy of the redacted (blacked out), sanitised file.**	- Save the document - it does not need to be renamed because it will save as a separate document with "Redacted" automatically appearing after the title. - The red outline version will remain saved. **Note:** if there are no redactions in the document, save the file as "SANITISED", e.g. "SMITH 20110902 Disclosure pgs 1-50_SANITISED."

This document was current as at 2 May 2022. Police policies are regularly reviewed and updated.
The most current version of Police policies are available from www.police.govt.nz

9/10

| 10 | **Add a watermark.**

This is an important risk mitigation step in case the document is lost or thrown away and recovered by anyone later. | - Click "Tools".

- Find and click the "Edit PDF" icon.

- On the top menu, select "Watermark" > "Add".

- Type relevant watermark text in the blank text box - e.g. Disclosed by NZ Police under the Official Information Act 1982

- Adjust the watermark font, size, colour (light grey) and rotation settings (45°) and position on the page, as required.

- Select "OK"

- Click "Save". |

Your file will now be ready for disclosure. Release it in the most appropriate way for the type of disclosure it is:

- for criminal disclosure cases, follow these steps

- for Privacy or OIA requests, you should be uploading using the IRT tool. For help using the IRT tool, and other handy OIA and Privacy request tips, go here.

This document was current as at 2 May 2022. Police policies are regularly reviewed and updated.
The most current version of Police policies are available from www.police.govt.nz

10/10