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DVA Redaction Guidelines

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Introduction

The Redaction Guidelines (guidelines) are designed to assist in responding to a request for information by providing guidance about how the information should be reviewed ahead of public release, and determining if certain information should be 'redacted' or in other words, removed.

The guidelines provide practical information for DVA staff involved in the release of information, whilst ensuring adherence to legislative obligations which includes the requirement to protect the privacy of others.

Purpose

The guidelines are a resource designed to support DVA staff who, as part of their duties, are responsible for releasing information to external parties. The guidelines provide the practical application of the policy and rules for redacting information being released.

The guidelines are supported by content on the <u>Department of Veterans' Affairs (DVA / the Department) website</u>¹ for veterans, their families and others. They provide clarity on the broader context for releasing information held by the Department. They also explain why certain information may be exempt from release or why some information may need to be redacted before release.

The Department has prioritised the administrative release of information as a mechanism for veterans and families to access information held by the Department. However the guidelines are equally applicable to all responses to requests for information irrespective of the channel through which they have been requested. For example, the guidelines would also be applicable to information being considered for release when requested under the *Freedom of Information Act 1982* (Cth) (FOI Act).

The guidelines do not operate so as to override the legislation, particularly the:

- Freedom of Information Act 1982 (Cth)² (FOI Act)
- Privacy Act 1988 (Cth)³ (Privacy Act)
- Office of Australian Information Commissioner FOI Guidelines⁴ (OAIC FOI Guidelines)
- Australian Privacy Principles Guidelines⁵ (APP Guidelines) and
- DVA Privacy Policy ⁶

¹ https://www.dva.gov.au/about/accessing-information

² https://www.legislation.gov.au/Series/C2004A02562

https://www.legislation.gov.au/Details/C2014C00076

https://www.oaic.gov.au/freedom-of-information/foi-guidelines

⁵ https://www.oaic.gov.au/privacy/australian-privacy-principles

⁶ https://www.dva.gov.au/dva-privacy-policy

but rather should be read together so as to understand how information release can be actioned according to law.

Who are the guidelines for?

The guidelines are for use by all DVA staff.

The guidelines are designed to support staff in promoting open and transparent access to personal and non-personal information through a 'business as usual' approach or in other words, administrative release of information.

The guidelines seek to assist staff understand the underlying basis of administrative release, make informed decisions about the types of documents most suitable for administrative release and when and where to escalate a request.

Background

The guidelines have been developed in response to Recommendation 9: Improve administrative release of information and Recommendation 10: Co-design information to increase awareness of redactions for access requests made by the Royal Commission into Defence and Veteran Suicide in their Interim Report7 released in August 2022. The Royal Commission recommended that:

"The Australian Government should engage with serving and ex-serving Australian Defence Force (ADF) members and their families to complete by March 2023 co-design information to raise the awareness of redaction and how it might apply to information provided to applicants seeking information from the Department of Defence or the Department of Veterans' Affairs under all information access request mechanisms."

The guidelines were drafted after consultation across DVA, with the Department of Defence (Defence) and with consideration of the outcomes of a series of co-design workshops held with representatives of the serving and ex serving communities, advocates and family members.

Redacting

Redacting refers to the process of obscuring information so that the sensitive or protected information cannot be read or identified. The Department ensures that reasonable steps are taken to protect personal information (including sensitive information) from unintended access, misuse, interference, loss, modification or disclosure. Before releasing any information, the information will be reviewed for any sensitivities and some information may need to be redacted for legislative reasons.

⁷ https://defenceveteransuicide.royalcommission.gov.au/publications/interim-report

When to consider redacting information

Redactions are required to protect information in line with the legislative obligations, advice and guidance provided for under the:

- 1. FOI Act 1985
- 2. OAIC FOI Guidelines
- 3. Privacy Act 1988
- 4. APP Guidelines
- 5. Redaction Guidelines
- 6. Administrative Access Guidelines
- 7. Legislative secrecy and confidentiality provisions of enactments that prohibits disclosure
- 8. Contractual or other legal obligations.

It is important to understand the sensitive nature of information held and released by the Department. When reviewing information in documents being considered for release (irrespective of the channel through which the information has been requested) reasonable steps should always be taken to protect personal information (including sensitive information) from unintended access, misuse, interference, loss, modification or disclosure.

Applicants seeking copies of their own personal information that does not contain the personal information of third parties may not require redactions. Examples include, but are not limited to:

- determination letters addressed to the applicant
- medical reports about the applicant, held by the Department
- providing a printed list of conditions for which the Department has accepted liability
- counselling session notes, and
- etters addressed to the applicant from the Department.

Where information contained within documents being released contains third party personal information, consideration must be applied for redacting sensitive information in accordance with the Privacy Act and APP 12 Guidelines, unless consent is obtained from the third parties to release the information.

In instances where departmental records contain information for which the applicant and the other parties were present, careful consideration must be given to whether consent should be acquired or redactions applied as the information, whilst containing the applicant's personal information also contains potentially sensitive information for other parties. Such records may include:

- case notes from face to face meetings involving multiple parties
- recordings with multiple parties in attendance
- couples counselling session notes, and
- notes from medical sessions with a healthcare practitioner.

Exempt Documents - FOI

Under Part IV of the FOI Act, some types of information may be considered exempt from release.

The OAIC Guidelines provide detailed information about each of the exemption provisions under the FOI Act, discussed below. The OAIC Guidelines should be considered in administrative release cases noting that the same degree of sensitivity is applicable in relation to all methods of information release. For further assistance in applying exemption to the release of information, please contact DVA's Information Access Unit (IAU) at Information.Access@dva.gov.au

The following information outlines the type of documents which can be considered exempt for release under specific sections of the legislation that is, Part IV of the FOI Act; and provides the reference to the relevant section of the Act.

Absolute Exemptions

Exempt documents (Division 2 of Part IV of the FOI Act) are:

- documents affecting national security, defence or international relations (s 33)
- Cabinet documents (s 34)
- documents affecting enforcement of law and protection of public safety (s 37)
- documents to which secrecy provisions of enactments apply (s 38)
- documents subject to legal professional privilege (s 42)
- documents containing material obtained in confidence (s 45)
- Parliamentary Budget Office documents (s 45A)

- documents disclosure of which would be contempt of Parliament or in contempt of court (s 46)
- documents disclosing trade secrets or commercially valuable information (s 47)
- electoral rolls and related documents (s 47A)

The exemptions in Division 2 of Part IV are not subject to an overriding public interest test. If a document meets the criteria to establish a particular exemption, it is exempt. There is no additional obligation to weigh competing public interests to determine if the document or information should be released. In no circumstances should documents falling within these absolute exemptions be released under the Administrative Release process.

Conditional Exemptions

By contrast, an agency or minister cannot refuse access to a document that is conditionally exempt under Division 3, Part IV without first applying a 'public interest test' (s 11A(5)) described below.

Documents which are conditionally exempt under Division 3 relate to the following categories:

- Commonwealth-State relations (s 47B)
- deliberative processes (s 47C)
- financial or property interests of the Commonwealth (s 47D)
- certain operations of agencies (s 47E)
- personal privacy (s 47F)
- business (other than documents to which s 47 applies) (s 47G)
- research (s 47H)
- the economy (s 47J)

Where a document is assessed as 'conditionally exempt', the Department must give access to the document unless in the circumstances, access would, on balance, be contrary to the public interest (s 11A(5)).

Paragraph 6.5 of the OAIC FOI Guidelines provide that the 'public interest test' is:

- something that is of serious concern or benefit to the public, not merely of individual interest
- not something of interest to the public, but in the interest of the public

- not a static concept, where it lies in a particular matter will often depend on a balancing of interests
- necessarily broad and non-specific, and
- related to matters of common concern or relevance to all members of the public, or a substantial section of the public.

The public interest test is weighted in favour of giving access to documents so that the public interest in disclosure remains at the forefront of decision making. The statement of reasons for the decision must include the public interest factors taken into account (s 26(1)(aa)).

Redaction of personal information

What is personal information?

When considering the release of information that is not directly about the person making the application, certain information may need to be redacted if it is classified as 'personal information'. The Privacy Act defines personal information as information or an opinion about an identified individual, or an individual who is reasonably identifiable. This can include:

- a person's name, address
- medical records
- account details
- photos
- videos/recordings, and
- information about what an individual likes, their opinions and where they work.

An important subset of personal information is sensitive information. This includes information or opinion about:

- an individual's racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- sexual orientation
- criminal record

- · health information; and
- aspects of genetic and biometric information.

In general, the Privacy Act affords a higher level of privacy protection to sensitive information than to other personal information.

Information constituting personal information under the Privacy Act will depend on whether an individual can be identified or is reasonably identifiable. Information in isolation may not be personal information when considered on its own, however when combined with other information that enables an individual to be reasonably identifiable it may become personal information. If it is unclear whether an individual is reasonably identifiable you should err on the side of caution and treat the information as personal information or consult with a manager.

Disclosure of public servants' names and contact details

Due to the potential to expose officers to workplace health and safety risks the Department encourages the redaction of the surnames and contact details of all non SES staff. The inclusion of a first name and positon number (where relevant) is generally sufficient information to release. For SES staff full names are to be released but contact details redacted. If an applicant insists on more, advice should be sought through IAU and administrative release may not be the most appropriate avenue for consideration of release.

Redacting electronic documents

Departmental records are predominantly stored in electronic format in accordance with the Department's records management policy. Adobe Acrobat Professional (Adobe Pro) is used to apply any redactions to these records prior to release.

Before applying any redactions, a copy of the original document should be saved with an appropriate naming convention referencing the original. The copied version will be used to apply redactions enabling the original to be maintained as a departmental record.

Redactions using Microsoft Office

Word processing software such as Microsoft Word is not considered appropriate software as documents need to be released in PDF format to prevent post release changes.

Notation of reasons for redaction

When information is redacted from documents, the following should be included in the decision letter:

- a) reasons why the information was redacted
- b) the legislation or guideline which requires the redactions
- an explanation of how/why the disclosure of information would, or could reasonably be expected to, cause damage or have an adverse effect
- d) a link for the applicant to submit questions, request a reconsideration or make a complaint.

Classification markings

Classification markings on a document (such as Secret or Confidential) are not in themselves conclusive of confidential communication. An agency still needs to produce evidence supporting the claim, for example, that information was communicated in confidence by a foreign entity. The decision maker must make an independent assessment of that claim in light of the available evidence. Similarly, even where a foreign government or agency has identified a document as secret or confidential, the decision maker is still required to make an independent assessment that the information was communicated in confidence.

General considerations

Carefully consider redactions

Where redactions are applied appropriately and within the correct context the information being redacted is often quite straight forward and should only be redacted in accordance with the appropriate sections of the relevant Acts. Over enthusiastic redactions applied to administrative releases can lead to the same information being requested under FOI and, importantly create unnecessary distress and delays for applicants.

Avoid duplications

The Privacy Act entitles individuals to access their personal information held by the Department, however where information is held in duplicate forms, it is not required to provide the same information multiple times over. Doing so can inadvertently create an excessively large document with reiterations of the duplicate redactions. This can give the impression that large amounts of information is being withheld than is actually the case.

For DVA, where information has previously been provided to the applicant or they are able to obtain the information themselves that is, through MyService, the applicant should be advised of this.

Providing a supported release of information

Good client service requires accurate and timely advice and guidance to applicants, using a trauma informed approach, when considering and handling information access requests. This includes the application and explanation of redactions. Clear and concise communication supports veterans, veteran's families and nominated representatives with understanding how the Department is supporting their application to information.

The Department has embedded a trauma informed approach in the way it releases information. The duty of care to applicants and staff is an important consideration when processing requests for information and the final release of departmental records to an applicant. Consideration should be given to when, how and to whom any information is released. Prior to release, all records need to be reviewed by DVA staff to identify any potential risks or sensitivities contained within the records. Sensitivities may include a negative outcome of a claim application, or a medical report that could exacerbate a condition being treated or cause emotional distress to the recipient. Where determined that a degree of risk is present, in consultation with the applicant to obtain their consent if possible, records can be released to a health care provider to support the applicant in review and understanding of the information contained. Examples of this may include, but are not limited to:

- complex specialist medical reports obtained by the department to support claims determinations
- medical reports that have diagnosed a medical condition not yet known to the applicant
- reports of family domestic violence, including assaults both physical and sexual involving minors
- clinical session notes containing highly sensitive content that may have an effect on the applicant, noting also that the applicant may be an authorised recipient (third party) to the information
- history of support required with the release of departmental records.

Where consent to receive the information via a third party is not given, and there are concerns for the health and/or safety of the recipient or a third party, refusal to release the information can be given after consulting with the IAU or a supervisor.

Where to seek assistance

For clarification or assistance with information access requests and redactions the IAU can assist. They can be contacted via email: lnformation.Access@dva.gov.au

In the course of their duties, staff may find some of the information being reviewed for release to be distressing. It is OK to acknowledge this. Help is available from your manager and through the Employee Assistance Program (EAP): **1300 360 364** from anywhere in Australia.

In releasing information which may be sensitive for the applicant, records can be released to a health care provider to support the applicant in review and understand the information. This release should be done in consultation with the applicant to obtain their consent if possible. (Refer to 'Providing a supported release of information' in the relevant section above).

Related information

- 1. Information Release Policy
- 2. Administrative Release Guidelines
- 3. Freedom of Information Act 1982 (Cth)
- 4. Privacy Act 1988 (Cth)
- 5. Archives Act 1983 (Cth)
- 6. Evidence Act 1995 (Cth)
- 7. OAIC's FOI Guidelines

Glossary

Administrative access – a method of accessing information or documents held by the Department, outside of the FOI Act or other legislative means

Agency - a Commonwealth Minister, certain Australian Government agencies and the Norfolk Island administration as set out in s 6(1) of the Privacy Act.

Applicant – an individual, business or organisation who makes a request for access to information or documents held by the Department

<u>Australian Privacy Principles</u> – 13 principles within the Privacy Act which govern standards, rights and obligations around:

- the collection, use and disclosure of personal information
- an organisation or agency's governance and accountability
- integrity and correction of personal information
- the rights of individuals to access their personal information

Cth - means Commonwealth

Department – The Department of Veterans' Affairs

Document – same meaning as under section 4 of the <u>Freedom of Information Act 1982 (Cth)</u>

Freedom of Information (FOI) – Freedom of Information Act 1982 (Cth)

Information – the content of documents

Information Access Unit – a central resource in the Department through which applicants can seek information held by the Department

Personal information – same meaning as in the <u>Privacy Act 1988 (Cth)</u>. It can include an individual's name, address, telephone number, date of birth, medical records, bank account details, taxation information and their signature

Redaction – information omitted, obscured or excised in whole or in part under the FOI Act or these Redaction Guidelines

Sensitive information - Information or an opinion about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, criminal record, health information and some aspects of genetic and biometric information, as set out in s 6(1) of the Privacy Act.

Third party – a person or entity other than the applicant for the information or the respondent agency or organisation that the applicant seeks information from.

Withhold – documents will not be provided to the applicant.

Keywords

Access to information; administrative access; Australian Privacy Principles; APP; disclosure log; FOI; freedom of information; OAIC; Office of the Australian Information Commissioner; information; personal information; privacy; release of information; right to information; third party.

Further information

For further advice or assistance, please contact the Department's Information Access Unit at Information.Access@gva.gov.au.

The owner of the Administrative Release Guidelines is the First Assistant Secretary, Client Engagement and Support Services, also responsible for the Department's Information Access Unit.

Attachment A: Most common examples of redactions applied to documents under the FOI Act

Below are the most frequently used redactions the department applies when releasing documents under the FOI Act. These are only examples, as the decision to apply a redaction falls to the Information Access Officer who is processing the FOI request. Each piece of information needs to be evaluated on its merit and a decision be made if the below should be applied.

Exemptions	Material we may apply them to
Section 42 – Legal Professional Privilege	Documents which contain advice from a solicitor or lawyer to their client or was created for the purpose of requesting advice.
Section 47 - Documents disclosing trade secrets or commercially valuable information	Material which may, if released provide a competitive edge in a tender application process.
Section 47E – Certain operations of agencies	Staff surnames (Non-SES), telephone numbers, email addresses, physical addresses
Section 47F - Personal privacy	Staff surnames (Non-SES), telephone numbers, email addresses, physical addresses & signatures
Section 47G - Business (other than documents to which s 47 applies)	Contemporary invoice values issued to the department

Attachment B: Request scenarios: Retain, redact or withhold

When a request is lodged for information or records under administrative access, what information is retained, redacted or withheld will depend on the type of information and the identity of the applicant. The following tables provide guidance for the various scenarios.

Request for personal information contained within a file or document

Applicant - the DVA client or on behalf of the DVA client by an authorised recipient of information

	Current Partner	Former Partner	Child / Dependant	Parent	Next of Kin
Name	Retain	Redact	Retain	Retain	Retain
Address	Retain	Redact	Retain	Retain	Retain
E-mail	Retain	Redact	Retain	Retain	Retain
Home Phone	Retain	Redact	Retain	Retain	Retain
Mobile Phone	Retain	Redact	Retain	Retain	Retain
Date of Birth	Retain	Redact	Retain	Retain	Retain
Signature	Retain	Redact	Retain	Retain	Retain

Please be mindful of domestic and family violence concerns which may impact what information can be safely released despite the above guide.

	Acting in an official capacity, including witness statements ⁸	Other persons mentioned in documents – provided / acknowledged / seen by applicant	Other persons mentioned in documents – not provided / acknowledged / seen by applicant	
Name	Retain	Redact	Redact	
Address	Retain	Redact	Redact	
E-mail	Retain	Redact	Redact	

⁸ Witness statements – the text/content of the witness statement is to be retained once the necessary redactions have been made

Home Phone	Redact	Redact	Redact
Mobile Phone	Redact	Redact	Redact
Date of Birth	Redact	Redact	Redact
Signature	Retain	Redact	Redact
ID Number	Redact	Redact	Redact

Examples of information that may lead to the identification of a witness after their other personal info has been removed					
I am the neighbour of	Redact				
I sit across the workstation from	Redact				
I was in the vehicle with	Redact				
I was on course with	Redact				
I was at the bar, at the time with	Redact				

Applicant – Current partner at time of death

	Deceased Member	Current Partner	Former Partner	Applicant's Child / Dependant	Child / Dependant (Not applicant's child/dependant)	Parent	Next of Kin (if not applicant)
Name	Retain	Retain	Redact	Retain	Redact	Redact	Redact
Address	Retain	Retain	Redact	Retain	Redact	Redact	Redact
E-mail	Retain	Retain	Redact	Retain	Redact	Redact	Redact
Home Phone	Retain	Retain	Redact	Retain	Redact	Redact	Redact
Mobile Phone	Retain	Retain	Redact	Retain	Redact	Redact	Redact
Date of Birth	Retain	Retain	Redact	Retain	Redact	Redact	Redact

Signature Retain Redact Retain Redact Redact Redact

Please be mindful of domestic and family violence concerns which may impact what information can be safely released despite the above guide.

	Acting in an official capacity, including witness statements ⁹	Other persons mentioned in documents – provided / acknowledged / seen by applicant	Other persons mentioned in documents – not provided / acknowledged / seen by applicant
Name	Retain	Redact	Redact
Address	Retain	Redact	Redact
E-mail	Retain	Redact	Redact
Home Phone	Retain	Redact	Redact
Mobile Phone	Redact	Redact	Redact
Date of Birth	Redact	Redact	Redact
Signature	Retain	Redact	Redact
ID Number	Redact	Redact	Redact

Examples of information that may lead to the identification of a witness after their other personal info has been removed				
I am the neighbour of	Redact			
I sit across the workstation from	Redact			
I was in the vehicle with	Redact			
I was on course with	Redact			
I was at the bar, at the time with	Redact			

⁹ Witness statements – the text/content of the witness statement is to be retained once the necessary redactions have been made

Applicant – Child/Dependant

	Deceased Member	Current Partner	Former Partner	Applicant	Child / Dependant (Not the applicant)	Parent	Next of Kin (if not applicant)
Name	Retain	Redact	Redact	Retain	Redact	Redact	Redact
Address	Retain	Redact	Redact	Retain	Redact	Redact	Redact
E-mail	Retain	Redact	Redact	Retain	Redact	Redact	Redact
Home Phone	Retain	Redact	Redact	Retain	Redact	Redact	Redact
Mobile Phone	Retain	Redact	Redact	Retain	Redact	Redact	Redact
Date of Birth	Retain	Redact	Redact	Retain	Redact	Redact	Redact
Signature	Retain	Redact	Redact	Retain	Redact	Redact	Redact

	Acting in an official capacity, including witness statements ¹⁰	Other persons mentioned in documents – provided / acknowledged / seen by applicant	Other persons mentioned in documents – not provided / acknowledged / seen by applicant
Name	Retain	Redact	Redact
Address	Retain	Redact	Redact
E-mail	Retain	Redact	Redact
Home Phone	Retain	Redact	Redact
Mobile Phone	Redact	Redact	Redact
Date of Birth	Redact	Redact	Redact
Signature	Retain	Redact	Redact
ID Number	Redact	Redact	Redact

¹⁰ Witness statements – the text/content of the witness statement is to be retained once the necessary redactions have been made

Examples of information that may lead to the identification of a witness after their other personal info has been removed				
I am the neighbour of	Redact			
I sit across the workstation from	Redact			
I was in the vehicle with	Redact			
I was on course with	Redact			
I was at the bar, at the time with	Redact			

Applicant: DVA client's Parent

	Deceased Member	Partner	Child / Dependant	Applicant	Parent (Not the applicant)	Next of Kin (if not applicant)
Name	Retain	Redact	Redact	Retain	Redact	Redact
Address	Retain	Redact	Redact	Retain	Redact	Redact
E-mail	Retain	Redact	Redact	Retain	Redact	Redact
Home Phone	Retain	Redact	Redact	Retain	Redact	Redact
Mobile Phone	Retain	Redact	Redact	Retain	Redact	Redact
Date of Birth	Retain	Redact	Redact	Retain	Redact	Redact
Signature	Retain	Redact	Redact	Retain	Redact	Redact

Please be mindful of domestic and family violence concerns which may impact what information can be safely released despite the above guide.

	Acting in an official capacity, including witness statements ¹¹	Other persons mentioned in documents – provided / acknowledged / seen by applicant	Other persons mentioned in documents – not provided / acknowledged / seen by applicant
Name	Retain	Redact	Redact

¹¹ Witness statements – the text/content of the witness statement is to be retained once the necessary redactions have been made

Address	Retain	Redact	Redact
E-mail	Retain	Redact	Redact
Home Phone	Redact	Redact	Redact
Mobile Phone	Redact	Redact	Redact
Date of Birth	Redact	Redact	Redact
Signature	Retain	Redact	Redact
ID Number	Redact	Redact	Redact

Examples of information that may lead to the identification of a witness after their other personal info has been removed		
I am the neighbour of	Redact	
I sit across the workstation from	Redact	
I was in the vehicle with	Redact	
I was on course with	Redact	
I was at the bar, at the time with	Redact	

Applicant: DVA client's listed next of kin

	Deceased Member	Partner (current & former)	Child / Dependant	Parent	Applicant / Next of Kin	Next of Kin (if not applicant)
Name	Retain	Redact	Redact	Redact	Retain	Redact
Address	Retain	Redact	Redact	Redact	Retain	Redact
E-mail	Retain	Redact	Redact	Redact	Retain	Redact
Home Phone	Retain	Redact	Redact	Redact	Retain	Redact
Mobile Phone	Retain	Redact	Redact	Redact	Retain	Redact
Date of Birth	Retain	Redact	Redact	Redact	Retain	Redact
Signature	Retain	Redact	Redact	Redact	Retain	Redact

Please be mindful of domestic and family violence concerns which may impact what information can be safely released despite the above guide.

	Acting in an official capacity, including witness statements ¹²	Other persons mentioned in documents – provided / acknowledged / seen by applicant	Other persons mentioned in documents – not provided / acknowledged / seen by applicant
Name	Retain	Redact	Redact
Address	Retain	Redact	Redact
E-mail	Retain	Redact	Redact
Home Phone	Redact	Redact	Redact
Mobile Phone	Redact	Redact	Redact
Date of Birth	Redact	Redact	Redact
Signature	Retain	Redact	Redact
ID Number	Redact	Redact	Redact

¹² Witness statements – the text/content of the witness statement is to be retained once the necessary redactions have been made

Examples of information that may lead to the identification of a witness after their other personal info has been removed		
I am the neighbour of	Redact	
I sit across the workstation from	Redact	
I was in the vehicle with	Redact	
I was on course with	Redact	
I was at the bar, at the time with	Redact	

Request is from a deceased DVA client's child/dependant

Applicant: Dependant requesting own documents (partner/child) within DVA client's records

	Deceased Member	Former Partner (not parent of the child)	Applicant	Parent (of Ex-member)	Next of Kin
Name	Withhold	Withhold	Retain	Withhold	Withhold
Address	Withhold	Withhold	Retain	Withhold	Withhold
E-mail	Withhold	Withhold	Retain	Withhold	Withhold
Home Phone	Withhold	Withhold	Retain	Withhold	Withhold
Mobile Phone	Withhold	Withhold	Retain	Withhold	Withhold
Date of Birth	Withhold	Withhold	Retain	Withhold	Withhold
Signature	Withhold	Withhold	Retain	Withhold	Withhold

	Acting in an official capacity, including witness statements ¹³	Other persons mentioned in documents – provided / acknowledged / seen by applicant	Other persons mentioned in documents – not provided / acknowledged / seen by applicant
Name	Withhold	Withhold	Withhold
Address	Withhold	Withhold	Withhold

¹³ Witness statements – the text/content of the witness statement is to be retained once the necessary redactions have been made

E-mail	Withhold	Withhold	Withhold
Work Phone	Withhold	Withhold	Withhold
Mobile Phone	Withhold	Withhold	Withhold
Date of Birth	Withhold	Withhold	Withhold
Signature	Withhold	Withhold	Withhold
ID Number	Withhold	Withhold	Withhold

Examples of information that may lead to the identification of a witness after their other personal info has been removed		
I am the neighbour of Withhold		
I sit across the workstation from Withhold		
I was in the vehicle with	Withhold	
I was on course with Withhold		
I was at the bar, at the time with	Withhold	