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## Redaction Policy

(UK GDPR & Data Protection Act 2018 Compliance)

### 1. Purpose

This policy sets out the procedures by which MW Fire Ltd removes or obscures personal data from documents before they are disclosed to any external organisation, platform, or reviewer. It ensures that all such disclosures comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### 2. Scope

This policy applies to all documents held by MW Fire Ltd that contain personal data and are subject to external disclosure. This includes, but is not limited to, subcontractor assessment forms, competency records, training certificates, personnel files, and any supporting documentation relating to subcontractors, employees, or third parties.

It covers all documents uploaded to external portals, emailed to auditors or accreditation bodies, or otherwise shared outside of MW Fire Ltd.

#### Exception: Training and Competence Disclosures

Where training or competence is the primary purpose of the disclosure, MW Fire Ltd will retain operative names, company names, company registration numbers, certificate information (including expiry dates), and any photographs included on training cards. These details are retained on the basis that operatives supply them for the legitimate purpose of evidencing their qualifications to external parties.

### 3. Redaction Method

MW Fire Ltd uses Adobe Acrobat Pro's built-in Redaction Tool to permanently remove personal data from documents. This method ensures that the underlying text is fully deleted rather than merely hidden, that redacted information cannot be recovered by any means, and that the resulting document is safe for external distribution.

Methods that do not permanently remove data, such as black boxes applied with drawing tools, cropping, or other non-destructive techniques, are not permitted. These approaches leave the original data intact within the file and therefore do not meet GDPR requirements for proper redaction.



#### 4. Personal Data to be Redacted

The following categories of personal data must be removed from all documents prior to external disclosure. This table is not exhaustive; any information capable of identifying a living individual, whether alone or in combination with other data, must also be redacted.

Categories of Personal Data for Redaction	
Full names of individuals	Home addresses
Personal or work email addresses	Mobile or landline telephone numbers
National Insurance numbers	Dates of birth
Emergency contact details	Passport or ID numbers
Bank details (sort code, account number, IBAN)	Handwritten or typed signatures
Payment references containing identifying information	Notes or comments that identify an individual

#### 5. Information Permitted to Remain Visible

Certain categories of information are not considered personal data in this context because they do not, on their own, identify a specific individual. The following may remain visible in disclosed documents: initials of subcontractors (e.g. TA), trade or competency card types (e.g. ECS, CSCS, IPAF), trade card expiry dates, company names, assessment outcomes and competency evaluations, reviewer comments, and job roles or trades.

Retaining this information allows MW Fire Ltd to demonstrate that appropriate competency checks have been carried out, without disclosing personal data that could identify individuals.

#### 6. Document Control

Once redaction has been completed, a new redacted version of the document is saved as a separate file. The original unredacted file is retained internally by MW Fire Ltd for compliance and audit purposes. Only the redacted version is uploaded to external portals, emailed to third parties, or otherwise shared outside of the organisation.

#### 7. Responsibility

The Health & Safety Administration is responsible for the operation of this policy. This includes ensuring that all documents are reviewed and redacted before external submission, that redaction is carried out using the approved Adobe Acrobat Pro method, and that no personal data is disclosed to third parties without a lawful basis under UK GDPR.

## 8. Declaration

MW Fire Ltd is committed to protecting personal data in accordance with UK GDPR and the Data Protection Act 2018. All documents shared with SMAS, accreditation bodies, or any other external parties are redacted in full compliance with this policy and the requirements of applicable data protection legislation.