

# Procedural Guide

*Environmental Protection Act 1994*

## Redaction of personal information under s542A

*This procedural guide outlines the business process for managing requests under s542A of the Environmental Protection Act 1994 (the Act) for redaction of personal information from documents published on the Public Register.*

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## 1. Purpose

This guide supports **Compliance Support** and **Compliance Officers** who coordinate, prepare or manage documents that may require redaction under s542A of the *Environmental Protection Act 1994* (EP Act).

It explains the actions required to manage an endorsed s542A request, including redaction preparation, Enforcement Owner responsibilities, what needs to be recorded, and key handover points with PaL and ESR Digital & Data. It does not replace any internal procedures maintained by PaL or ESR Digital & Data.

This guideline should be read in conjunction with information on the [Public Register - Privacy concerns and redactions](#) page, found on the [Compliance Knowledge Centre](#).

## 2. Scope

This procedure applies where:

- A request under s542A is received by Permits and Licensing (PaL) using the approved application form, [Application to withhold personal information from a public register \(ESR/2023/6439\)](#);
- The relevant document is already published, or intended to be published, on the Public Register; and
- The document contains identifiable personal information.

This procedure is limited to implementing endorsed s542A requests by removing or redacting personal information from the publicly available version of a document. **It does not authorise amendment of the original decision or notice, or any change to the content, effect or intent of the document.**

This procedure does not apply to:

- PaL and ESR Digital & Data responsibilities – these are included for process awareness only;
- Information held outside the Public Register;
- Formal Right to Information (RTI) or Information Privacy (IP) requests; or
- Business information that is already publicly available, including business names or other non-personal business identifiers, unless that information also contains or reveals personal information relevant to an endorsed s542A request.

## 3. Roles and responsibilities

Redaction applications are managed jointly by Permits and Licensing (PaL), ESR Digital & Data, Compliance Support and the relevant Compliance Centre.

### 3.1 Permits and Licensing (PaL)

PaL will receive and coordinate all s542A applications, authorise implementation and advise ESR Digital & Data of the endorsed request and scope of information to be withheld. Once all steps have been completed, PaL will liaise with the applicant to confirm the redaction process has been completed.

### 3.2 ESR Digital & Data

ESR Digital & Data will identify affected Public Register documents, fields, systems and places where the information is published, implement required updates, manage any technical publication issues and notify affected business areas, including Compliance Support, where document removal or a replacement redacted version may be required.

Importantly, within Dynamics, ESR Digital & Data will:

- Select the appropriate redaction tick box(es), e.g. “*Redact Customer Personal Details*”, “*Redact Customer Address*” and/or “*Redact Compliance Location*”.

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- Add a Warning to the Customer record and/or Location record (where applicable), in the Compliance Hub advising that a s542A redaction application has been received and implemented; and
- Upload relevant application documents, including the application form, Zendesk notes and related correspondence, to the relevant Case in the Compliance Hub.

ESR Digital & Data is not responsible for preparing redacted document versions for eDOCS or republication.

### 3.3 Compliance Support

Compliance Support is responsible for:

- Notifying the relevant Compliance Centre, Enforcement Owner and Compliance Delivery Manager of the implemented redaction. Compliance Support will provide the endorsed scope and instructions, and ask the Compliance Centre to confirm whether the redacted version should be republished or remain suppressed;
- Providing redaction instructions and any endorsed scope information needed to support the Compliance Officer (Enforcement Owner) to prepare and retain the redacted version correctly;
- Uploading prepared Enforcement documents to the Public Register Portal in accordance with existing Public Register upload processes, including uploading the redacted version where the Compliance Officer (Enforcement Owner) or Compliance Centre decides the redacted version should be republished;
- Maintaining the Compliance audit trail, including Enforcement Owner consultation, redaction preparation, QA checks and publication confirmation;
- Retaining completion advice and relevant records.

### 3.4 Compliance Officer (Enforcement Owner)

Compliance Officers (Enforcement Owners) for affected documents are responsible for:

- Providing subject matter input about the document content and context, including any issues relevant to applying the endorsed redaction scope;
- Preparing the redacted version of the affected document using Compliance Support's instructions;
- Saving the redacted version in eDOCS as a **New version** over the existing unredacted version, so both versions remain available under the one eDOCS item;
- Contributing to, or confirming, the Compliance Centre's decision about whether the redacted version should be republished or remain suppressed;
- Providing the redacted version to Compliance Support through the normal Public Register upload process if republication is required;
- Checking that relevant Compliance Hub Customer, Location and/or Case records have the appropriate redaction boxes ticked and Warning applied, and notifying PaL and Compliance Support if any required update is missing;
- Ensuring endorsed redactions are carried forward before any amended, reissued or replacement document is provided for publication;
- Ensuring the original unredacted departmental record remains available for formal RTI or Information Privacy Act requests; and
- Assisting Compliance Support to resolve any issues associated with the affected document or its ongoing management.

**Redaction of personal information under s542A****4. Procedure****4.1 Step 1 – Compliance Support receives confirmation that the request is ready for action**

 **Responsible Team:** *Compliance Support*

Compliance Support and Compliance Centres must not directly receive, assess or action s542A redaction applications. All applications must be submitted to PaL using the approved form and processed by PaL before any compliance action is taken.

*Compliance Support will only start the steps in this procedure once it has received ESR Digital & Data notification, PaL implementation advice or another clear handover confirming the request has been endorsed and is ready for Compliance action.*

1. Confirm the endorsed scope of information to be withheld is clear from the notification, advice or supporting application material.
2. Record the endorsed scope, affected document versions, implementation advice and any relevant business context for Compliance action.
3. Confirm that relevant Compliance Hub Customer, Location and/or Case records have the appropriate redaction boxes ticked and Warning applied, and notify PaL if this has not occurred.
4. Notify the relevant Compliance Centre (cc'ing the Enforcement Owner and Compliance Delivery Manager) and provide the endorsed scope of information to be withheld and redaction instructions.
5. Instruct the Compliance Centre to prepare the redacted version and decide, once it has been prepared, whether the redacted version should be republished on the Public Register Portal or remain suppressed.
6. Where uncertainty exists about the endorsed scope or Compliance implementation actions, seek advice from management and/or Legal Services.

**4.1.1 Email template – Compliance Officer redaction and publication decision**

Compliance Support may use or adapt the following wording when contacting the Compliance Officer (Enforcement Owner) to advise that a redaction request has been received and to confirm whether the affected document should remain suppressed or be republished in redacted form.

**Subject:** s542A redaction request – redaction and publication decision required for [document name/reference]

Good morning/afternoon [name],

Compliance Support has been notified of a request under s542A of the *Environmental Protection Act 1994* to withhold personal information from the Public Register.

The request relates to the following document:

- Document reference: [insert]
- Document type: [insert]
- Relevant holder/customer/location: [insert]
- Information to be withheld: [insert summary of endorsed scope]
- Current Public Register status, if known: [removed/suppressed/published/other]

**The personal information identified has already been suppressed in the Compliance Hub and from the Public Register Portal, and the affected document(s) removed pending your decision about suppression or republication.**

**Redaction of personal information under s542A****What you need to do**

1. Action the following steps before **close of business on [day, date]**
2. Prepare a redacted version of the affected document(s) following these strict instructions:
  - a) Create **a copy of the original Word version of the document**
  - b) Identify all instances where the personal information to be redacted appears in the document (see *Information to be withheld* above)
  - c) Delete personal information and replace with this text in bold: **[NOT DISCLOSED]**  
**DO NOT USE black text boxes or any other form of redaction.**
  - d) Save Word version and PDF document
  - e) Locate the PDF version of the document in eDOCS
  - f) Save the redacted PDF version of the document as a **New version** over the existing unredacted PDF version – both versions must be retained by the Compliance Centre
3. Make a decision:
  - a) **Permanently suppress the document(s) from the Public Register** – the document will remain unavailable on the Public Register. You must still prepare and save a redacted version in eDOCS as a **New version** over the existing unredacted version, so a suitable version is available if the Public Register team later receives an offline request for the document; or
  - b) **Republish a redacted version** – you must prepare the redacted version using the instructions provided by Compliance Support, save it in eDOCS as a **New version** over the existing unredacted version, and provide the redacted version to your Public Register Portal Uploader through the normal process.
4. **Advice Compliance Support once these actions have been completed.**

**For your consideration:**

- When considering your decision (step 3), assess whether the Compliance Centre has capacity to respond to future offline Public Register team requests for the document, or whether it would be more efficient to republish the redacted version on the Public Register Portal once the endorsed information has been removed. You should also consider whether the remaining content could still identify the individual or increase the relevant personal safety risk.
- Please note that both the unredacted and redacted versions must be maintained under the one eDOCS item. The original unredacted version must remain available for formal RTI or Information Privacy Act requests, as RTI requests may require access to the unredacted departmental record.
- The redacted version must be created and saved in eDOCS even if you do not intend to republish the document on the Public Register Portal. This is required so officers responding to offline Public Register requests are aware of the redaction in place, without relying solely on Compliance Hub warnings or other cross-checks, and can access the current redacted version from eDOCS.
- **This request must be actioned by [date/time].** If you cannot action this request within the stated timeframe, have concerns about the request or would like to advise of any relevant business context we should record, please notify Compliance Support immediately.

Regards,

Compliance Support

**Redaction of personal information under s542A****4.2 Step 2 – Prepare redacted version**

**👤 Responsible Team:** *Compliance Officer (Enforcement Owner)*

Redaction under this procedure is limited to removing or redacting personal information in accordance with an endorsed s542A request. It is not an amendment of the original decision or notice (i.e. s24AA AIA) and must not be used to change the content, effect or intent of the notice.

**The original unredacted version must not be deleted from official departmental recordkeeping systems unless authorised under endorsed records management processes.**

1. Compliance Support will notify the relevant Compliance Centre, Compliance Officer (Enforcement Owner) and Compliance Delivery Manager of the redaction application and provide the endorsed scope of information to be withheld and redaction instructions.
2. The Compliance Officer (Enforcement Owner) must prepare the public redacted version of the affected document(s), even where permanent suppression is chosen and the document will not be republished on the Public Register Portal.
3. The Compliance Officer (Enforcement Owner) saves the redacted version in eDOCS as a **New version** over the existing unredacted version, ensuring both versions are maintained under the one eDOCS item.
4. Where a notice is amended, reissued or replaced in the future, the Compliance Officer (Enforcement Owner) must ensure any endorsed redactions are re-applied before publication.
5. The Compliance Officer (Enforcement Owner) must retain access to, and provide where required, the original unredacted version for formal RTI or Information Privacy Act requests. The public redacted version prepared under this procedure does not replace the official unredacted departmental record.

**NOTES:**

- *Saving the redacted version as the latest eDOCS version is the primary mitigation for offline Public Register requests, because officers responding to those requests may access eDOCS without also checking Compliance Hub warnings. Compliance Hub warnings are an additional visual cue only and should not be relied on as the sole control for preventing inappropriate release of personal information.*
- *Both versions (redacted and unredacted) must be retained because formal RTI or Information Privacy Act requests may require access to the original unredacted version.*

**4.2.1 How to prepare a redacted version**

1. Create a copy of the original Word version of the document.
2. Using the endorsed scope provided by Compliance Support, identify every instance of the personal information that must be withheld. Check the full document, including headers, footers, tables, appendices, images, diagrams, maps, screenshots and any other visual content capable of revealing the protected information.
3. Delete each instance of the personal information and replace it with **[NOT DISCLOSED]** in **bold** text.  
**Use the exact wording provided. Do not use black text boxes, shapes, highlighting, image overlays, text colour changes, cropping or any other method that only covers the information.**
4. Review the redacted document to ensure the layout remains readable, page numbering is correct and the redaction has not created unnecessary blank space or formatting issues.
5. Save the redacted Word version.
6. Convert or save the redacted Word version as a PDF.

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7. Check the redacted PDF to confirm the endorsed information has been removed and cannot be found by searching, copying and pasting, or reviewing document properties or metadata.
8. Locate the existing unredacted PDF version of the document in eDOCS and save the redacted PDF version in eDOCS as a **New version** over the existing unredacted PDF version, so both versions remain retained under the one eDOCS item.
9. Advise Compliance Support once the redacted version has been prepared and saved, and confirm whether the Compliance Centre has decided to permanently suppress the document or republish the redacted version.

**NOTES:**

- *Step 1 requires a copy of the original Word version so the officer can prepare a redacted working version without altering the original unredacted departmental record. If the original Word version of the document cannot be located, contact Compliance Support for advice.*
- *Step 3 requires the information to be deleted and replaced with **[NOT DISCLOSED]** because covering information with boxes, shapes or other visual treatments may leave the original information recoverable, searchable or visible in the file structure.*
- *Step 9 requires the redacted PDF to be saved as a **New version** over the existing unredacted PDF in eDOCS so officers responding to offline Public Register requests access the current redacted version first, while both versions remain available under the one eDOCS item.*

**4.3 Step 3 – Quality assurance check**

A second officer within the Compliance Centre should confirm:

- all endorsed information has been redacted;
- no unintended information has been removed;
- the redacted information cannot be recovered from the public version;
- the document remains readable;
- any images, maps or visual references that could identify the endorsed information have also been redacted or removed; and
- the version prepared for publication aligns with the endorsed scope of redaction.

**4.4 Step 4 – Public Register upload or suppression confirmation**

 **Responsible Team:** *Compliance Officer (Enforcement Owner) and Compliance Support*

1. The Compliance Centre confirms with Compliance Support whether the redacted version should be republished on the Public Register Portal or remain suppressed.
2. Where republication is required, the Compliance Officer (Enforcement Owner) provides the prepared redacted version to Compliance Support through the normal Public Register upload process.
3. Compliance Support uploads the prepared redacted version to the Public Register Portal in accordance with existing Public Register upload processes.
4. Where the document is to remain suppressed, Compliance Support records the suppression decision and retains the Compliance Centre's advice.
5. Compliance Support may decline to republish a notice on the Public Register Portal until the required redaction has been actioned and the redacted version has been provided in accordance with this procedure. The Compliance Centre is responsible for correcting the redacted version and resubmitting it through the normal Public Register upload process.

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**4.4.1 Recommended document naming convention for Public Register Portal upload**

1. The Compliance Centre's Uploader will prepare the document in accordance with normal Public Register upload processes.
2. The document's file name and version number remains the same, as the redacted version is a replacement, not an amendment of the original document.

Example:

**Previous unredacted version:**

STAT-E-00123456\_1\_EEONotice.pdf

**Redacted version:**

STAT-E-00123456\_1\_EEONotice.pdf

**5. Follow-ups**

Compliance Support will review completed s542A redaction requests periodically. The review will include a check of relevant Compliance Hub Customer, Location and/or Case records to confirm the appropriate redaction tick boxes remain selected and have not been cleared unintentionally.

Where a notice is amended, reissued or replaced and a new version is prepared for upload to the Public Register Portal, Compliance Support will check that the same endorsed redactions have been addressed and that the QA steps Compliance is responsible for under this procedure have been completed before republication.