



CITY OF SAN RAFAEL POLICIES AND PROCEDURES

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| Subject: | Redaction Policy |
| Resolution No. | N/A |
| Issue Date: | 02/06/2019 |
| Revision Date: | N/A |
| Prepared By: | Lindsay Lara, City Clerk |
| Approved By: | Jim Schutz, City Manager |

REDACTION POLICY

PURPOSE:

The City of San Rafael values civic engagement and wishes to afford members of the public the opportunity to participate while respecting the privacy of those who may not wish to have their personal information published online. The purpose of this policy is to establish guidelines for publishing documents to the internet that include personally identifiable information.

RESPONSIBILITY:

All City Departments, Divisions and City Officials.

POLICY:

This policy establishes guidelines for redacting documents that include personally identifiable information prior to being published to the internet.

DEFINITIONS:

Personally Identifiable Information (PII): Any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means, including and not limited to account numbers and other sensitive information. For purposes of this section, “personal information” means either of the following:

1. An individual’s first name or first initial and last name in combination with any one or more of the following data elements, when either the name or the data elements are not encrypted:
 - a. Social security number.
 - b. Driver’s license number or California identification card number.
 - c. Account number or credit or debit card number, in combination with any required security code, access code, or password that would permit access to an individual’s financial account.
 - d. Medical information.
 - e. Health insurance information.
 - f. Information or data collected through the use or operation of an automated license plate recognition system, as defined in Section 1798.90.5.
 - g. Home address, email address and telephone numbers.
2. A user name or email address, in combination with a password or security question and answer that would permit access to an online account.

Redaction Policy

For purposes of this policy, “personal information” does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

Additionally, information permitting the physical or online contacting of a specific individual is the same as personally identifiable information. This information can be maintained in either paper, electronic, or other media.

PROCEDURE:

Publishing Documents Online:

When preparing documents to be published on the website, City Staff shall redact PII listed in the document. If the address must be listed in the document, then the name of the property owner should be redacted.

References to Certain Project Applicants:

1. When preparing agendas, City staff shall list only the address of the property in question and shall refer to the owner as “The Property Owner.”
2. When preparing the document to be published online, all PII attached to the property address shall be redacted.
3. Project applicants speaking in support of their application at a Planning Commission or City Council meeting shall have their name listed as a speaker in the minutes in the same manner as all other speakers.
4. Commercial entities applying for planning related applications will continue to be identified by name in Planning Commission and City Council agendas, minutes and staff reports.

PII in Public Records

If staff is unclear regarding PII in public records, the City Attorney’s Office will make the final determination.

PII Prior to Adoption of this Policy:

All PII in documents dated prior to the adoption of this policy and posted on the City’s website, may be redacted from the online version of documents upon request made by the subject of the information. Requests may be submitted to the City Clerk. Requests should include the title of the documents and the website URL for which the redaction is requested, and the City Clerk shall thereafter redact the online records if doing so will be consistent with this policy. However, the official minutes maintained by the City Clerk shall remain as approved by the City Council or Planning Commission, as applicable.

APPROVED BY:



Jim Schutz, City Manager

02/08/2019

Date