

Phase 1 Redaction and Anonymity Protocol

Introduction and purpose of this Redaction and Anonymity Protocol

1. This Phase 1 Redaction and Anonymity Protocol is provided further to the Manston Inquiry's (the 'Inquiry') Phase 1 Overview Protocol, the Phase 1 Disclosure Protocol and the Phase 1 Witness Evidence Protocol for Detained Individuals. This Protocol should also be read alongside the Inquiry's Privacy Notice. All are available on the website.
2. This Phase 1 Redaction and Anonymity Protocol sets out the approach that the Inquiry will take with regards to the redaction of material during Phase 1 and the Anonymisation (as defined below) of identities for those detained individuals who provide witness statements or other written evidence to the Inquiry.
3. As set out in the Inquiry's Phase 1 Witness Evidence Protocol for Detained Individuals, the Inquiry has identified a need, from its outset, to collect written witness evidence and accounts from those individuals who were detained at Manston during the relevant period. Whilst the Inquiry is aware of the need for transparency and open justice, it is also mindful of the need to ensure that individuals detained at Manston during the relevant time can effectively participate in the Inquiry. The Inquiry is also concerned that such individuals may decline to provide such evidence without their identities being suitably Anonymised (as defined below) by the Inquiry and this will adversely affect the effectiveness of the Inquiry's work.
4. Accordingly, the Inquiry Chair is satisfied that in order to encourage such individuals to provide written witness evidence and to avoid the risk of their identities being revealed, the Inquiry's general approach will be to Anonymise (as defined below) and protect their identities by applying suitable ciphers and other redactions in place of their names.
5. In light of these paragraphs, therefore, during Phase 1 the Inquiry intends to:

- a. apply, on the basis set out in this Protocol, any necessary personal data redactions to Relevant Material (as defined below) received from MPs (as defined below) as well as, where necessary, any witness statements or written evidence obtained during Phase 1; and
 - b. Anonymise the identities of those individuals detained at Manston during the relevant time who provide witness statements and written evidence to the Inquiry and apply consequential redactions in order to prevent individual identities from being revealed, unless such identities need to be revealed in order to discharge the Inquiry's Terms of Reference.
6. The procedures outlined in this Phase 1 Redaction and Anonymity Protocol are not intended to cover every eventuality or every procedural issue that may arise. It follows that, in exceptional cases, where the interests of justice and fairness require it, the Inquiry may need to depart from this Protocol.

Definitions

7. In this Protocol, the following definitions shall apply:
- a. "Anonymisation/Anonymised/Anonymity" is the protection of a person's identity from disclosure by using suitable ciphers.
 - b. "Material" means anything in which information of any description is recorded whether in paper or electronic form. It includes, but is not limited to, policy documents, policy statements, reports, reviews, audio recordings, video footage, photographs, physical evidence, information stored electronically on computer systems, meeting/attendance notes and minutes, manuscript notes, memoranda, leaflets, spreadsheets, correspondence (post and/or fax), internal and external email communications, social media communications and data, SMS messages, WhatsApp messages, design plans, technical drawings and contract documents.
 - c. "Material Provider" ('MP') means any person, institution or organisation which has been requested to provide Potentially Relevant Material to the Inquiry or which has provided Potentially Relevant Material voluntarily to the Inquiry. For

the avoidance of doubt, Material Providers may include His Majesty's Government and any Department of State or Minister of the Crown.

- d. "Potentially Relevant Material" means Material which is in the control of MPs and, having regard to the Inquiry's Terms of Reference, it is likely that the Inquiry would wish to be provided with it and/or such Material has been specifically requested by the Inquiry. For the avoidance of doubt, Material is in an MP's control if that MP has a) physical possession of it; or b) a right to possession of it; or c) a right to inspect or take copies of it.
- e. "Redact/Redaction/Redacted" means the removal of information from Relevant Material in disclosure or publishing processes, usually through the process of blacking out or obscuring text, data or information in that Material and in such a way that it is not possible to ascertain what information is contained beneath the blacked out or obscured text, data or information.
- f. "Relevant Material" means Potentially Relevant Material which has been reviewed by the Inquiry and has been confirmed as relevant to the Inquiry's Terms of Reference.

Personal data Redactions applied by the Inquiry during Phase 1

- 8. Potentially Relevant Material obtained from MPs pursuant to the Inquiry's Phase 1 Disclosure Protocol and witness statements or written evidence obtained pursuant to the Phase 1 Witness Evidence Protocol for Detained Individuals will be uploaded onto the Inquiry's Document Management System ('DMS'). The Inquiry will confirm the relevance of the Potentially Relevant Material on the DMS in accordance with the Inquiry's Terms of Reference with such Potentially Relevant Material becoming, if confirmed, Relevant Material.
- 9. With respect to Relevant Material and witness statements or evidence received during Phase 1, the Inquiry will, as a data controller, apply in a consistent manner, any necessary Redactions required to comply with its obligations under the UK General Data Protection Regulation and the Data Protection Act 2018. These Redactions may apply to personal data, sensitive personal data and criminal convictions and offences personal data.

10. The Inquiry's approach will be governed by the relevance of that personal data to the Inquiry's Terms of Reference and the subsequent necessity of its disclosure. In both cases, such information will be Redacted by the Inquiry without the need for applications from MPs.
11. The Inquiry therefore expects to Redact, unless the same is relevant in specific cases, the following categories of personal data from all Relevant Material and witness statements or written evidence received during Phase 1:-
 - a. dates of birth.
 - b. the names of individuals who were detained at Manston during the relevant period but who are not providing witness statements or other written evidence.
 - c. personal addresses, telephone numbers, email addresses and other contact details, but not professional contact details.
 - d. signatures.
12. The Inquiry will keep under review and will decide whether any other personal data, sensitive personal data and/or criminal convictions and offences personal data needs to be Redacted on a case by case basis.

Anonymisation of detained individuals

13. For the reasons set out in paragraphs 2 to 5 above, in order to protect the identities of individuals detained at Manston during the relevant period and who are providing witness statements or other written evidence to the Inquiry during Phase 1, the Inquiry's general approach will be to Anonymise such individuals.
14. Anonymisation will be applied through the use of a cipher which comprises a series of random letters to replace the name of the relevant individual in Relevant Material or witness statements or written evidence. Anonymisation ciphers will be applied to relevant witness statements or written evidence prior to being signed and formally submitted to the Inquiry.

15. Any such Anonymisation by the Inquiry may necessitate the application of consequential Redactions to Relevant Material and witness statements to avoid revealing such identities.
16. Anonymisation applied by the Inquiry in this way will be applied automatically and will not need an application by the respective individual(s).
17. The Inquiry will liaise with the relevant individual and/or their legal representative in order to determine the appropriate Anonymisation cipher for that individual.

Subsequent phases of Inquiry work

18. As the Inquiry determines the scope of work to be covered in subsequent phases, this Protocol may be extended, added to or replaced in due course. Any such amendment, extension or replacement versions will be published on the Inquiry website.

Issued under the authority of the Chair on 09 July 2025.