

TOWN OF MENDON

RECORDS PUBLICATION AND REDACTION POLICY

(To be incorporated into Procurement Policy and Records Management practices)

1. Purpose

This policy establishes uniform procedures for reviewing and redacting records prior to public posting, in order to:

- Protect personal privacy

- Ensure compliance with the New York Freedom of Information Law (FOIL)

- Maintain consistency across all Town departments

2. Applicability

This policy applies to all records generated, received, or maintained by the Town that are:

- Posted on the Town website

- Included in online meeting packets

- Distributed electronically to the public

This policy supplements the Town's procurement, records retention, and FOIL procedures.

3. Legal Authority

This policy is adopted consistent with:

- New York Freedom of Information Law

- Applicable provisions of the New York General Municipal Law

- Records retention requirements issued by the New York State Archives

4. Standard for Disclosure and Redaction

All records shall be reviewed prior to publication. Information shall be redacted where disclosure would:

- Constitute an unwarranted invasion of personal privacy

Expose sensitive personal or financial information
Create a risk to public safety or security

5. Required Redactions

The following information shall be removed or obscured unless disclosure is required by law:

A. Personal Identifiers

Social Security numbers
Driver's license numbers
Taxpayer identification numbers

B. Personal Contact Information

Personal phone numbers
Personal email addresses
Home addresses (except where integral to the record, such as property records)

C. Dates of Birth

Full dates of birth (partial redaction permitted where needed)

D. Financial Information

Bank account and routing numbers
Credit/debit card information

E. Signatures

Handwritten signatures

F. Sensitive Information

Medical or health-related information
Information relating to minors
Information that could compromise safety

6. Procurement and Financial Records

As part of procurement transparency:

Vendor names, contract amounts, and general descriptions **shall remain public**

Care shall be taken to redact:

Personal contact details of sole proprietors

Banking or tax information included on forms (e.g., W-9s)

Bid documents must be reviewed before posting to remove non-public attachments

7. Department-Specific Responsibilities

A. All Departments

Responsible for initial review and redaction of their records.

B. Town Clerk

Oversees consistency with FOIL requirements

Maintains final authority on public posting standards

C. Highway Department

Reviews invoices, delivery tickets, and emergency purchase records

Ensures no embedded personal or financial data is disclosed

D. Building/Planning Departments

Carefully review applications and supporting documents for personal data

8. Redaction Procedures

Redactions must permanently remove underlying data

Acceptable tools include Adobe Redaction or equivalent

Visual-only masking (e.g., black boxes) is prohibited

9. FOIL Coordination

Records released under FOIL must be:

Reviewed again before website posting

Evaluated under a broader “public distribution” standard

10. Training and Compliance

Staff shall receive periodic guidance on redaction practices
Improperly posted documents shall be promptly corrected or removed

11. Review

This policy shall be reviewed annually and updated as needed.

Town Board Resolution

TOWN OF MENDON

TOWN BOARD RESOLUTION NO. ____ OF 2026

ADOPTION OF POLICY FOR REDACTION OF PERSONAL INFORMATION IN PUBLICLY POSTED RECORDS

WHEREAS, the Town Board of the Town of Mendon recognizes its responsibility to provide public access to government records while protecting personal privacy; and

WHEREAS, the Town is subject to the requirements of the New York Freedom of Information Law (FOIL); and

WHEREAS, the Town Board finds it necessary to establish uniform procedures for the review and redaction of records prior to publication on the Town's website or other electronic distribution;

NOW, THEREFORE, BE IT RESOLVED, that the Town Board hereby adopts the "Records Publication and Redaction Policy," attached hereto and made a part hereof; and

BE IT FURTHER RESOLVED, that this policy shall apply to all Town departments, including but not limited to the Town Clerk, Highway Department, and Building Department; and

BE IT FURTHER RESOLVED, that the Town Clerk is authorized to oversee implementation of this policy and to issue guidance as necessary for compliance; and

BE IT FURTHER RESOLVED, that the Town Board may amend this policy from time to time as needed to reflect changes in law or best practices; and

BE IT FURTHER RESOLVED, that this resolution shall take effect immediately.
