

The Statutory Independent Inquiry into Grooming Gangs

Protocol on Restriction Orders, Redaction and Anonymity

1. This document explains how the Independent Inquiry into Grooming Gangs ('the Inquiry') will approach the redaction of information, the making of Restriction Orders, and applications for anonymity. It outlines the legal and procedural framework governing restrictions on the disclosure or publication of information, and the process by which such issues will be considered and determined.
2. The Inquiry will conduct its work in a manner that is open and transparent. However, the Inquiry recognises that there will be circumstances in which limits must be placed on the disclosure or publication of information. This may be where necessary to protect individuals, ensure fairness, or safeguard the public interest.
3. This Protocol should be read in conjunction with the Protocol on the Disclosure of Documents, which sets out the Inquiry's approach to the receipt and handling of information available on the Inquiry's website.
4. All documents provided to the Inquiry must be originals or, if the original is not available, the best available copies, intact and in unredacted form, save when this Protocol applies.

Redaction

5. Redaction is the removal of information from a document by obscuring text. Its main purpose is to protect sensitive and personal data before documents are disclosed to other participants in the Inquiry or published. Decisions about redaction are for the Chair. This is the case whether or not a redaction request has been made by the person who provided the material. The Inquiry will normally carry out redactions itself, applying this Protocol.

6. When redacting documents, the Inquiry will follow the procedure set out in this Protocol. However, this Protocol does not cover every situation. The Chair may depart from the procedure outlined in this Protocol, but any such departure will be made in accordance with her duty to act fairly and in the interests of justice with notice given to affected parties as appropriate.

Stage 1

7. Upon receipt, the Inquiry will review all documents before disclosure to ensure compliance with its obligations under the UK General Data Protection Regulation and Data Protection Act 2018. The Inquiry's approach to redaction of personal data is guided by the relevance of the data to the Inquiry and whether its disclosure is necessary and proportionate.
8. The Inquiry will normally redact private addresses, private email addresses, private telephone numbers, dates of birth and signatures. This information will be redacted without the need for any Restriction Order or order for anonymity, unless it is relevant to the Inquiry's Terms of Reference.
9. The Inquiry will decide whether any other information needs to be redacted on a case-by-case basis, such as where information is obviously irrelevant and sensitive.

Stage 2

10. A person or organisation which provides documents to the Inquiry (a Material Provider' or 'MP') will be notified before the relevant document is disclosed to Core Participants so that the MP may indicate which part or parts of the document (if any) they seek to have redacted on the grounds that its disclosure is not relevant and necessary for the purposes of the Inquiry. Reasons must be given by MPs for each proposed redaction. When seeking redactions, all MPs are expected to have consulted any relevant third parties. The Inquiry will not ordinarily liaise with persons other than the MP in respect of redaction

requests.

11. The Inquiry expects MPs to take a measured and proportionate approach when seeking redactions. Documents will be redacted only where there is a good reason to do so. It is anticipated that most redaction requests can be resolved through this approach without the need for formal, document-specific Restriction Orders.

Restriction Orders

12. As set out in the introduction to this Protocol, the Inquiry's starting point is transparency and openness. However, the Chair may make orders to keep information private where it is necessary to do so. These are known as Restriction Orders and are made in accordance with section 19 of the Inquiries Act 2005.
13. A Restriction Order made by the Chair must only specify such restrictions as:
- a. are required by law (section 19(3)(a)); or
 - b. the Chair considers to be conducive to the Inquiry fulfilling its Terms of Reference (section 19(3)(b)); or
 - c. the Chair considers to be necessary in the public interest (section 19(3)(b)).
14. Restriction Orders normally remain in force unless and until they are varied or cancelled. They will usually continue at least until the Inquiry has concluded, and often beyond that. A person affected by a Restriction Order may apply to the Chair for it to be varied or cancelled. The Chair may also vary or cancel a Restriction Order of her own initiative where she considers it necessary to do so.

15. Restriction Orders must be complied with by everyone. This includes members of the media, members of the public, witnesses, Core Participants, legal representatives, and all members of the Inquiry team.

Anonymity and Special Measures

16. Anonymity is the protection of a person's identity from disclosure. It should not be confused with 'special measures', which are intended to assist vulnerable or intimidated witnesses and may include the use of screens, giving evidence in private, or giving evidence by 'live link'.
17. As an Inquiry that is addressing sexual offending (and taking into account the requirements contained in the Sexual Offences (Amendment) Act 1992) all victims of sexual offences will be automatically anonymised and provided with a unique cipher, unless they have chosen to waive such anonymity.
18. It is anticipated that, in most other cases, concerns raised by witnesses will be addressed through the use of special measures rather than anonymity.
19. Subject to paragraph 18 above, where the Inquiry makes a request under Rule 9 of the Inquiry Rules 2006 to take evidence from a person, and that person wishes their identity to be protected from disclosure (or where an individual seeks anonymity in any other circumstances), the Inquiry expects that person to apply for a Restriction Order (see below for the procedure to follow).
20. Where anonymity is granted, the Inquiry will assign the person a pseudonym or cipher, which will be used consistently in disclosed statements, at hearings and in published material alongside the redaction of identifying information in accordance with this Protocol.
21. In some circumstances (and where permitted by law) fairness may require the Inquiry to disclose the identity of an anonymised individual to another person or group of people. This may arise, for example, where criticism is made that

requires a response from the person or group criticised. Any disclosure of this kind will be strictly controlled. Any person who receives such information must keep it confidential and must not disclose it to any other person. Where the Inquiry proposes to disclose the identity of an anonymised individual, it will give that individual advance notice and an opportunity to make representations before any disclosure is made.

Procedure for applying for a Restriction Order

22. Applications for a Restriction Order (including applications relating to anonymity) must be made in writing to the Inquiry Legal Team. Any application must include:

- a. An open section, identifying the restriction sought and setting out, so far as possible, the details of the application and the grounds on which it is made, without defeating the purpose of the application;
- b. A closed section, containing any remaining information about the application and the grounds upon which it is made. Information included in the closed section will constitute “potentially restricted evidence” within the meaning of Rule 12(1) of the Inquiry Rules 2006. Where this relates to information contained within a document, reference should be made to the page number and if possible the relevant paragraph(s);
- c. Supporting evidence, which may, where necessary, also be provided in open and closed form.

23. The Chair will determine on a case by case basis whether (and the extent to which) a Restriction Order application or decision will be shared with Core Participants and published. Where fairness requires it, information may be disclosed to affected parties (including, where appropriate, representatives of the media) to enable them to understand the nature of the restriction sought or the decision made. Where the Chair considers it necessary, this may include

issuing a 'minded to' decision and inviting written submissions from Core Participants before determining the matter.

24. Applications for Restriction Orders should normally be made when Individuals submit their written statement to the Inquiry, or within 7 days of the Inquiry notifying the MP that it intends to disclose a document provided to it by the MP to Core Participants.

25. In the case of applications for anonymity which are made prior to the submission of written statements (or where there is no written statement), applications should be made as soon as possible and in any case within 7 days of any confirmation from the Inquiry that it intends to publish the identity of the individual(s).

26. Applicants may request a variation or revocation of a Restriction Order at any time before the Inquiry concludes. The Chair may also vary or revoke an Order of her own initiative.

Compliance and enforcement

27. Restriction Orders are binding on all persons, including witnesses, Core Participants, legal representatives, members of the public and the media. Breach of a Restriction Order may be referred to the High Court, which has the power to impose sanctions including a prison term or fine.

Contact and Review

28. Any questions concerning this Protocol should be directed to the Inquiry on Solicitor@grooming-gangs.independent-inquiry.uk.

29. This Protocol takes effect on the date set out below and applies unless and until updated or replaced. This Protocol may be revised during the course of the Inquiry. Any amended version will be published on the Inquiry's website following approval by the Chair.

10 June 2026