

PR14H Completion Notes

Purpose of the PR14H

The PR14H form records your organisation's access recommendation for records being transferred to PRONI. It provides:

- a clear statement of whether records are open, closed or partially closed,
- the legal basis for that recommendation, and
- the information PRONI requires to implement it.

The form acts as an instruction to PRONI, and provides an audit trail of your decision-making.

Your Responsibility

The transferring organisation (or its successor) remains the Responsible Authority under FOIA for access recommendations.

This means:

- your organisation is responsible for identifying and applying FOIA exemptions,
- your organisation must be able to explain and justify decisions made, and
- you may be consulted on these decisions after transfer if a request is received.

PRONI does not provide advice on how to apply FOIA exemptions.

General Requirements

A completed PR14H must:

- record one clear access recommendation for each record or series,
- list all relevant FOIA exemptions,
- include a clear explanation of why those exemptions apply, and
- be signed off by the appropriate senior officer (e.g. DIM or equivalent).

Forms must be complete, legible, and internally consistent. Incomplete or unclear forms may delay transfer.

Level of Detail

The level of detail recorded should reflect the nature of the sensitivity review undertaken and how the records will be accessed.

NI Departments

Departments must provide sufficient detail to support proactive release, including:

- identification of all sensitive information,

- clear indication of where it appears within the record, and
- specific instructions that can be applied by PRONI.

Other Public Authorities

Other authorities must provide a clear and defensible access recommendation, including

- the overall access status (open / closed / partially closed),
- relevant FOIA exemptions, and
- a clear explanation of the nature of the sensitive information.

The form must contain enough information to support future access decisions if the authority is consulted under FOIA.

Where a record or series is identified as partially closed, the PR14H should explain the nature of the sensitive information. PRONI will not apply redactions to these records and will treat them as closed for access purposes.

Clarity of Instructions

Where exemptions are applied, the PR14H must clearly describe what information is affected, and why it is being withheld.

Avoid vague statements such as “contains personal data”. Instead, provide clear, specific explanations that can be understood and applied by others.

For non-departmental transfers, descriptions should support future FOI handling rather than detailed pre-transfer redaction.

Handling Records During Sensitivity Review

Records identified for transfer to PRONI are part of the archival record of Northern Ireland and must be handled accordingly. Staff undertaking sensitivity review must ensure that records are not altered in any way.

You must not:

- remove (“weed”) material from files
- add notes, annotations or additional information to records
- mark, write on or otherwise alter records
- apply redactions directly to records (e.g. using correction fluid or marker pen)

Sensitive information should be identified using temporary and reversible methods (e.g. numbered bookmark and explained in detail on the PR14H form).

Records should be handled in a clean environment and protected from damage (e.g. food, drink, or poor storage conditions).

Application of FOIA Exemptions

Public authorities are responsible for identifying and justifying FOIA exemptions. PRONI will apply access recommendations based on the information provided and may, where appropriate, challenge or seek clarification on proposed exemptions. This reflects the expectations set out in the FOIA Section 46 Code of Practice.

In line with the principles of FOIA, there is a general presumption that information should be made available unless there is a clear and justifiable reason for it to be withheld.

Common Issues to Avoid

- Missing or incomplete exemption references
- Vague or unclear descriptions of sensitive information
- Conflicting instructions within the same form
- Missing Public Interest Test (where required)
- Missing or incorrect sign-off

After Transfer

After records are transferred PRONI will implement access recommendations based on the information provided, and may consult the Responsible Authority if a request for access is received.

The quality of the PR14H form will directly affect how efficiently your organisation can respond to such requests.

Further Information

Download the PR14H form

[PR14H form]