
Wolverhampton

City Council



DISPOSAL OF CONFIDENTIAL WASTE POLICY

Change History

Version	Date	Description	Author
0.1	15/03/2013	First Draft	A.Moore
0.2	27/03/2013	Revised following audit review	A.Moore
0.3	26/04/13	Revised following IGB consultation	A. Moore

1. Introduction

The purpose of this document is to:

- Establish the Council's approach to the disposal of confidential waste.
- Inform members of the public, service users, third parties and contractors about how the Council disposes of waste that may contain confidential information.
- Inform staff – including students, volunteers and private contractors – working for, or on behalf of, the Council of their responsibilities with regards to the disposal of confidential waste and how the Council will enable these to be met.

2. General Principles

The term 'confidential' is used in this policy to cover all information that has a protective security requirement. This will include personal information, sensitive personal information, information obtained under a duty of confidence, commercial sensitive information, and information with restricted distribution or time limited distribution. It will also include protectively marked information under the Government Protective Marking Scheme – 'PROTECT and RESTRICT' markings.

This policy must be read in conjunction with the Information Protective Marking and Handling Policy that gives details of how to identify confidential records.

It applies to information and records falling into the above categories whether or not a protective marking of any kind has been applied. Confidential information can be held on a variety of media – on paper and in diaries, in computers and on a computer disks or CDs, on audio and video tapes. Irrespective of how the information is held, all staff are responsible for ensuring that, when required, confidential information will be disposed of securely by the implementation of this policy.

3. Policy

Destruction of confidential waste must be complete:

- Paper must be incinerated or shredded using a crosscut shredder (see 6.);

- Destruction of electronic records, storage devices and tape must be by incineration or the use of specialised equipment or software that will destroy the information;
- Floppy disks and CDs can be cut up and disposed as per paper waste;
- It is not necessary to incinerate crosscut shredded paper – shredding is an acceptable method of total destruction of confidential information and the remains are safe to be sent for recycling.

Confidential waste must be kept secure and protected against accidental loss, damage or unauthorised access up until its final destruction:

- Confidential waste should be kept separate from other waste material and confidential waste bins used where possible, otherwise waste should be bagged and clearly labelled “confidential waste”.
- Bagged waste awaiting collection must be kept secure at all times.
- Only authorised council personnel or an approved contractor should handle the waste.

If destruction is to take place off site, the waste must be escorted and its destruction witnessed by an authorised member of staff unless the contractor is specialised in the secure destruction of confidential waste and will provide destruction certificates.

If the destruction is to take place onsite, the contracted supplier must be specialised in the secure destruction of confidential waste and their procedures must conform to recognised industrial standards.

If a non-specialised waste disposal service is used, the following standards apply:

- An authorised member of staff must escort the waste off site and witness its destruction;
- A certificate of destruction must be provided;
- The confidential waste bags must be kept secure and separate from any other waste whilst waiting to be destroyed; and
- The bags must not be opened prior to destruction. Hand sorting of the waste for recycling or for any other purpose is unacceptable practice.

4. Responsibilities and Accountabilities

Compliance with this policy is mandatory for all staff working for or on behalf of the Council – including students, volunteers and private contractors – and they are responsible for being aware of, and complying with, the disposal of confidential waste procedures in use in the locality/localities in which they work.

Line managers will ensure compliance within their sphere of responsibilities and control.

Any breach of the policy should be classed as a security incident and reported via the Information Incident Contact Point (see the Information Incident Policy).

5. Policy Implementation

It will be ensured that any contractor disposing of confidential waste on behalf of the council will comply with this Policy.

For small quantities of paper to be disposed of on an ongoing basis, shredding is an easy and convenient option. Advice can be obtained from Procurement Services regarding purchasing of a suitable office shredder.

For digital media of all types, advice on secure destruction should be sought from ICTS.

For the destruction of larger quantities of paper or media the Council's approved contractor will be used.

6. Review

This policy will be reviewed at least annually or when required by changes circumstances.