Confidential Waste Guidance

# Introduction

All employees working in the university are bound by a legal duty of confidence to protect personal information they may come into contact with during the course of their work. This is not just a requirement of their contractual responsibilities but also a requirement within data protection legislation.

Under UK GDPR personal data should be” adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed”. This is referred to as the 'data minimisation' principle. The Act also states personal data should be “processed in a manner that ensures appropriate security of the personal data.......using appropriate technical and organisational measures”.

This document provides guidance to university staff for the disposal of physical documents that are confidential (“confidential waste”). Destruction of electronic data held in University managed systems will be managed by ITS.

## Confidential Waste

Confidential information within the university is commonly thought of documents containing personal data; however, it can also include information that is private and not public knowledge or information that an individual would not expect to be shared. Information can relate to students, staff (including temporary staff), and/or external third parties.

Under this procedure, waste that needs to be disposed of as sensitive and confidential fall into the following categories:

### Documents containing personal data

Personal data is anything that about a person or contains the means to identify a person, e.g. name, address, date of birth, student ID number, staff payroll number, personnel records. This list is not exhaustive.

### Documents and records containing commercially sensitive information

Commercially sensitive information is anything that relates to contracts, tenders, purchasing records. Confidential and sensitive information can also relate to unpublished minutes from meetings, draft policies and procedures.

## Procedure

All PSDs and schools should regularly assess the physical records they hold and determine when a document/record has come to the end of its life cycle. The university has a [records retention schedule](https://www.londonmet.ac.uk/about/policies/records-management/records-retention-schedules/), and this should be used to determine when a document/record has come to the end of its life cycle and can be destroyed.

The Estates Department can provide Confidential Waste Bags/Sacks for each PSD/School to store confidential waste in prior to collection and disposal by our Facilities services.

When you require confidential waste bags, please log a call via the Estates helpdesk at [ask@londonmet.ac.uk](mailto:ask@londonmet.ac.uk).

### Procedure for employees and departments

* Check any waste that you throw away - anything that contains personal or sensitive information must be treated as confidential waste
* Please remove documents from folders, plastic/ paper wallets, box files, poly pockets, paper clips, treasury tags before being sent for destruction.
* Confidential waste must be kept in a secure location pending collection by Facilities services.
* Do not leave confidential waste in areas accessible to the public/students such as corridors, open plan offices, unlocked offices/classrooms
* For legacy CDs, floppy disks, and audio/video tapes that need to be disposed of as confidential please contact ITS.

For collection of confidential waste bags once full, log a call via the Estates helpdesk at [ask@londonmet.ac.uk](mailto:ask@londonmet.ac.uk).