

Whitgreave Primary School Guidance Notes on the Safe Disposal of Records

This guidance applies to all types of record, whether they are in paper or digital format.

Disposal of records that have reached the end of the minimum retention period allocated

The General Data Protection Regulations state that information must be "kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed". The Data Manager will ensure that records that are no longer required for business use are reviewed as soon as possible under the criteria set out so that only the appropriate records are destroyed. The local review will determine whether records are to be selected for permanent preservation, destroyed, digitised to an electronic format or retained by the organisation for research or litigation purposes.

A data retention information document holds further information.

Decision made will be documented as part of the records management policy within the organisation.

Safe destruction of records

All records containing personal information, or sensitive policy information will be made either unreadable or un-reconstructable.

- Paper records will be shredded using a cross-cutting shredder
- \cdot CDs / DVDs / Floppy Disks will be cut into pieces
- Audio / Video Tapes and Fax Rolls will be dismantled and shredded
- Hard Disks should be dismantled and sanded

Any other records will be bundled up and disposed of to a waste paper merchant or disposed of in other appropriate ways.

Where an external provider is used it is recommended that all records must be shredded on-site in the presence of an employee.

GDPR - Rev 10/2018

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Whitgreave Primary School must also be able to prove that the records have been destroyed by the company who should provide a Certificate of Destruction.

Staff working for the external provider should have been trained in the handling of confidential documents.

The shredding needs to be planned with specific dates and all records should be identified as to the date of destruction. It is important to understand that if the records are recorded as to be destroyed but have not yet been destroyed and a request for the records has been received, they MUST still be provided.

Where records are destroyed internally, the process must ensure that all records are recorded as authorised to be destroyed by a Senior Manager and the destruction recorded. Records should be shredded as soon as the record has been documented as being destroyed.

Freedom of Information Act 2000 (FOIA 2000)

The Freedom of Information Act 2000 requires Whitgreave Primary School maintains a list of records which have been destroyed and who authorised their destruction. Members of staff should record at least:

- File reference (or other unique identifier)
- File title (or brief description)
- Number of files and date range
- The name of the authorising officer
- Date action taken

Following this guidance will ensure that the school is compliant with the relevant information governance legislation.

Transfer of Records to the archives

Where records have been identified as being worthy of permanent preservation, arrangements should be made to transfer the records to the school's archives.

Transfer of information to other media

Where lengthy retention periods have been allocated to record, the data manager may consider converting paper records to other media such as microform or digital media. The lifespan of the media and the ability to migrate data where necessary should be considered.