

DATA DISPOSAL/ DESTRUCTION PROCEDURE



Kingsridge
Cleddans

HOUSING ASSOCIATION LIMITED

Approved By	Management Committee
Approved Date	24 January 2023
Review Date	30 January 2024

INTRODUCTION

In compliance with data protection law, Kingsridge Cleddans Housing Association (KCHA) will ensure that any personal data it processes will be protected at all times, retained only as long as is necessary in accordance with KCHA's retention Policy and Schedule, and disposed of in the most appropriate manner.

HARD COPY DOCUMENT DESTRUCTION

- Paper documents must be disposed of in a timely manner in accordance with the retention periods specified in KCHA's Retention Schedule.
- Documentation that is to be disposed of is to be checked before disposal and any documents that contain personal data or sensitive information must be treated as confidential waste.
- Confidential waste must not be left in areas accessible to the public or in areas where there are people who are not entitled to see it, for example, corridors, open-plan offices, unlocked offices, the reception area or anywhere in view of members of staff/visitors/public who should not have access to that information.
- Any documents containing personal data must be disposed of as follows:
 - *By placing in confidential waste bins or bags*
 - *By shredding*
 - *By burning / incineration*
 - *By secure collection for disposal by specialist contractors, e.g., Highlander Shredding*
 - *etc*
- Prior to disposal, documents are to be removed from folders, plastic/ paper wallets, box files, poly pockets etc and paper clips, staples and treasury tags are to be removed.
- Recycling bins are available for paper documents that do not contain personal data or other sensitive data which does not require secure disposal or destruction.

ELECTRONIC MEDIA AND DOCUMENT DESTRUCTION

- Electronic documents must be disposed of in a timely manner in accordance the retention periods specified in KCHA's Retention Schedule.
- All electronic media devices including PCs, laptops, tablets, hard drives, removable hard drives, data sticks and mobile phones should be returned to the

Association for destruction / disposal in an appropriate manner when they are no longer required.

- KCHA uses a specialist company to dispose of electronic equipment. They will provide KCHA with a Certificate of Secure Data Destruction which specifies the method of destruction. This will include the serial number(s) of any equipment they have disposed of.
- For the disposal and destruction of disks, DVDs, CDs, audio, or video tapes (including CCTV footage if applicable), these should be passed to the Director who will record that they have been received and securely destroyed or disposed of.
- For documents, including emails, that are to be permanently deleted, ie, put beyond use, the person deleting the document must do all that is reasonably and practicably possible to ensure that deletion has been done in such a way that the document cannot be recovered. For example, emails should also be deleted from the 'Deleted Items' folder.
- If any data subject exercises their right to Correct, Erase or Restrict the processing of any personal data held by KCHA, we must ensure that this is also corrected on any backup drives or systems, whether they be KCHA's drives/systems or a data processors'.

Any questions relating to this procedure should be addressed to the DPO in the first instance.