

# **DATA DISPOSAL POLICY**

**Morpeth School**

**September 2024**



# **MORPETH SCHOOL Data Disposal Policy**

## **Data Disposal Policy**

### **1. Policy Statement**

- 1.1 The purpose of this policy is to provide guidelines for how records and documents are to be classified, retained, and destroyed to ensure that data is kept for only the period necessary to conduct business and are destroyed in compliance with local authority and government regulations.
- 1.2 This policy applies to data in any form (including paper and electronic documents, e-mail and all correspondence) produced, collected or used by Morpeth School, its employees, volunteers, student workers, consultants, or agents during the course of school business.

### **2. Responsibilities**

- 2.1 All school staff are responsible for ensuring that data they produce, collect, or use is properly classified, stored and protected and destroyed in accordance with this policy. Relevant staff are responsible for:
  - Being familiar with the document retention and destruction policy;
  - Develop the school's data management procedures and practices, consistent with this policy;
  - Educate staff in understanding sound data management practices;
  - Restrict access to protected and sensitive data and information; and
  - Coordinate the destruction of data
  - Data should not be retained beyond the period that it is needed for business processes or business continuity (in accordance with the latest IRMS document and the UK General Data Protection Regulation).
  - IT Department Equipment Recycling Policy is attached as Appendix A

### **3. Electronic Data**

#### **3.1 Computer Hardware and other electronic devices**

- a) The school understands the importance of correctly disposing of redundant ICT equipment to ensure safe removal of hazardous substances and sensitive data.

#### **3.2 Environmental Considerations**

- a) As part of the European Union Waste Electrical and Electronic Equipment (WEEE) Directive (2003) and existing waste management legislation, including the Duty of Care and the Hazardous Waste Regulations, Morpeth School recognises their environmental responsibilities.
- b) ICT equipment is built using a number of hazardous materials including lead, cadmium and mercury. Disposal poses a real threat of pollution to our water, air and land.
- c) Components are also made using various materials including precious metals which it is important to reclaim.

#### **3.3 Data Protection**

- a) The UK General Data Protection Regulation protects the use of personal data and ensures that those who are authorised to use it keep it private and secure.

- b) Formatting disks or deleting data from computer equipment in the usual way is not sufficient to safeguard information from being recovered. Although there are more thorough means of discarding this information there is not a 100% reliable method.
- c) The school understands the importance of ensuring sufficient removal of personalised data, confidential data or any other data coming within the remit of the Data Protection Act from the disc or memory of the PC/item of ICT equipment.
- d) This also includes deletion of data from any other computer media disposed with the PC/item of ICT equipment (e.g. discs or memory sticks).
- e) We therefore do not sell our ICT equipment to other organisations unless all personal data has been permanently deleted.
- f) Hard drives, floppy discs, CDs or other computer media that are faulty or cannot be wiped of data will be physically destroyed on behalf of the school through a registered disposal scheme.

#### **3.4 Software Licensing**

- a) Morpeth School ICT technicians shall ensure that all software is removed before equipment is disposed of by suitable disposal company.

#### **3.5 Electrical Checks**

- a) The Electricity at Work Regulations (1989) requires the school to regularly test electrical equipment to ensure safety of use.
- b) The school will ensure that all electrical tests have been carried out on any equipment sold to other users.

#### **3.6 Documentation and Audit Trail**

- a) The school maintains a comprehensive inventory of its ICT equipment. When items of equipment are disposed of through waste, it is recorded against its inventory record.
- b) Disposal of any IT equipment is logged on the school's asset management software and brought to the attention of the governing body resources committee for authorisation as per the terms of the Scheme of Delegation and noted in the Asset Management and Disposal policy.

### **4. Paper records and files which have reached the end of their administrative life**

#### **4.1 Safe destruction of records**

- a) Where confidential records have been identified for destruction they should be disposed of in an appropriate way. All records containing personal information, or sensitive policy information is either shredded before disposal using a cross cut shredder or put into confidential bags and collected for shredding by a recognised confidential waste disposal company.

#### **4.2 Transfer of records to the Archives**

- a) Where records have been identified as being worthy of permanent preservation arrangements should be made to transfer the records to the appropriate storage facility.

#### **4.3 Transfer of information to other media**

- a) Where lengthy retention periods have been allocated to records, members of staff may wish to consider converting paper records to other media such as microform or digital media.
- b) The lifespan of the media and the ability to migrate data where necessary should always be considered.

Morpeth IT Department Equipment Recycling Policy

Once deemed obsolete or surplus to requirements, all IT equipment should be disposed of in a suitable manner, as follows:

- The item type, make, model, asset number and serial number should be recorded (where applicable)
- Relevant changes to the equipment status should be made on the IT Helpdesk Inventory
- Items should be collected by an IT equipment recycling company
- Network client computers that do not hold personal data should have their hard drives wiped by the recycling company
- Computers that hold personal data, such as servers, laptops and standalone computers, should have their hard drives destroyed by the recycling company
- IT equipment that does not hold data, such as monitors, projectors, printers and interactive whiteboards, should also be collected by the recycling company
- Ancillary items such as keyboards, mice and cables should also be collected by the recycling company

Morpeth IT Department have used the following companies to carry out this work:

Safe PC Disposal	01235 534365	<a href="http://www.safepcdisposal.co.uk">www.safepcdisposal.co.uk</a>
PRM Green Technologies Ltd	0800 840 9195	<a href="http://www.prmgreentech.com">www.prmgreentech.com</a>
Revive IT Recycling Ltd	0203 582 2578	<a href="http://www.revivingit.co.uk">www.revivingit.co.uk</a>
IJT Direct	0800 083 4555	<a href="http://www.ijtdirect.co.uk">www.ijtdirect.co.uk</a>

Version control	
Implementation date	1 <sup>st</sup> September 2024
Next review	31 <sup>st</sup> August 2025

Ownership and consultation	
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Document author	Craig Donaldson
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