SECURE HANDLING AND DISPOSAL OF CONFIDENTIAL WASTE PROCEDURE

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REPLACES SEPT DOCUMENT
REPLACES NEP DOCUMENT
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AUTHOR: Head of Estates and Facilities
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PROCEDURE SUMMARY
The Trust has a responsibility to ensure that all documents and records of a confidential nature are destroyed and also to ensure that prior to the destruction process that these documents / records are stored securely. Non-compliance has very serious implications for both the Trust and individuals. As such every member of staff must take responsibility for ensuring that when and where they are required to dispose of documents etc. that are of a confidential nature, that these actions are carried out appropriately, so as not to compromise confidentiality.

THE TRUST MONITORS THE IMPLEMENTATION OF AND COMPLIANCE WITH THIS PROCEDURE IN THE FOLLOWING WAYS:
Reporting of any incidents via Datix. Regular monitoring and reports to relevant committee. Contractual review meeting. Auditing and Monitoring

SCOPE

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The Director responsible for monitoring and reviewing this policy is Executive Chief Finance Officer
PROCEDURAL GUIDELINES FOR THE SECURE HANDLING, AND DISPOSAL OF CONFIDENTIAL WASTE

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1.0 **INTRODUCTION**

1.1 The Trust has a responsibility to ensure that all documents and records of a confidential nature are destroyed and also to ensure that prior to the destruction process that these documents / records are stored securely. Non-compliance has very serious implications for both the Trust and individuals. As such every member of staff must take responsibility for ensuring that when and where they are required to dispose of documents etc. that are of a confidential nature, that these actions are carried out appropriately, so as not to compromise confidentiality.

1.2 The procedure should be read in conjunction with the Storage Retention and Destruction of Records Procedure, CPG9C.

Please Note: both documents have been written to ensure that the Trust complies with the guidance issued in the Data Security and Protection Toolkit.

2.0 **CONFIDENTIAL WASTE**

2.1 Confidential waste is anything that contains:

- Patient and/or Person Identifiable Information
- Personal Information
- Corporately Sensitive Information

2.1.1 Person Identifiable Information is information about a person which would enable that person’s identity to be established by one means or another. This might be fairly explicit such as an unusual surname or isolated postcode which could allow the person to be identified.

2.1.2 Personal Information is a category of personal information that is usually held in confidence and whose loss, misdirection or loss of integrity could impact adversely on individuals, the organisation or on the wider community. For e.g. where the personal information contains details of the individual’s:

- Health or physical condition
- Sexual life
- Religious beliefs
- Trade union
- Political opinions
- Criminal convictions
- Personal Details
- Payroll data
2.1.3 Corporately Sensitive Information is that which if disclosed may, adversely affect the Trust’s reputation.

### 3.0 STORAGE CONFIDENTIAL WASTE

3.1 Confidential waste must be stored securely either in locked consoles or bins or in a secure room or compound prior to destruction.

3.1.1 An approved contractor will supply confidential waste containers which will be serviced on a regular basis and any documentation etc. contained with will be destroyed. Departments etc. requiring this service must contact their relevant Estates and Facilities Department:

- South Essex - [Redacted]
- North Essex - [Redacted]
- Bedford and Luton - [Redacted]
- West Essex - [Redacted]

Please state the approximate quantities of waste they anticipate generating and agree a frequency for service and destruction.

Containers will include:
- Blue Wheelie bins
- Grey consoles
- Blue or white plastic sacks

**Please note:**
- Wards and departments must not make their own arrangements with external contractors to dispose of their confidential waste.

3.2 All bins are to remain locked at all times & bags must be stored securely to prevent unauthorised access. Responsibility for secure storage lies with the producers of the waste.

3.3 Keys to confidential waste storage containers and compounds must be kept secure at all times by a nominated authorised person(s) on individual sites.

### 4.0 RETRIEVAL OF INCORRECTLY CONSIGNED CONFIDENTIAL MATERIAL

4.1 In the event that confidential waste/data/material is mistakenly or accidently placed in a secure confidential waste container, a request can be made to an authorised person (Typically a Building Administrator or Team Manager) to open the container or compound.

4.1.1 If keys are not available the authorised person should place a ‘Do not remove notice’ on the lid of the waste container. The Estates and Facilities Department must be informed so that they can postpone the scheduled collections of the waste containers and to arrange for the bin to be opened with duplicate keys.
4.2 The authorised person(s) will act as a witness to the opening, retrieval of the ‘confidential data’ and relocking of the confidential waste container to maintain the secure handling and disposal of confidential waste process.

4.3 After the event the authorised person(s) and the requestor must sign a Retrieval Form (see appendix 1) to record and evidence the event. The original requestor must also inform the Information Governance department of the event by sending a copy of the Retrieval Form.

5.0 DESTRUCTION OF CONFIDENTIAL WASTE

5.1 Confidential waste must be destroyed, either by using a dedicated, approved service arranged by the Estates and Facilities Department or by shredding the unwanted data using a cross cut shredder.

5.2 Charges for the confidential waste destruction service will be paid for by the wards, department etc. producing the waste.

5.3 Where appropriate, i.e. designated areas only producing small quantities of confidential documents, it is permissible to shred waste using a cross cut shredder.

5.3.1 Shredded confidential waste can be placed in a clear recycling bag before being placed in the recycling bin.

5.4 In the event of a ward/department having a large quantity of confidential waste to be destroyed, the Estates and Facilities Department will make the necessary arrangements for the most cost effective method of destroying the waste.

5.5 Any queries regarding the storage and destruction of confidential waste should be directed to either the Estates Facilities Department (see 3.2) or one of the Information Governance Leads:

   - Associate Director of Electronic Systems and Information Governance
   - Head of Performance and Information
   - Head of IT Service Delivery and Customer Services
   - Information Governance Manager

END