



IT Services

Confidential Waste Policy

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Confidential Waste

1. Introduction

1.1 Overview

This policy is for all those that may come into contact with personal, personal sensitive or confidential information. It outlines what is classified as confidential waste, how to securely dispose of it and the consequences of breaching this policy.

Only paper must be disposed of via the confidential waste uplift process e.g. no plastic folders, lever arch folders, poly pockets etc

Confidential waste bags must be tied before uplift.

All bags presented must be clearly labelled to identify the premises and department that they have come from.

This ensures rejected bags can then be returned to the correct department

For clarity “personal information” is any information containing at least a name and address. “Sensitive personal information” has additional information relating to religion, ethnicity, politics, health, trades union membership. A full list of sensitive personal information can be found below.

1.2 Intended Audience

This document is for elected members, employees, temporary and agency staff, supply teachers, consultants and public/private sector partners.

1.3 Scope

This document outlines the procedures to be followed by those handling confidential waste.

1.4 Related Documents

- Building Security Policy
- ICT Acceptable Use Policy
- Employee Code of Conduct
- Incident Reporting Policy

2. Confidential Waste

Confidential Information must be protected at all times - this is particularly important during its disposal. The Information Commissioner now has the powers to impose significant fines on organisations that fail to do so.

Data Protection is everyone's responsibility, therefore everyone must familiarise themselves with Council's Confidential Waste Policy.

Examples of confidential information

Examples of Confidential Information	
All forms of employee, legal, medical and financial details	Contracts
Citizen identifiable information held in social care, health, education, benefits and financial records	Accounts Records
Citizen Identifiable Information e.g. passport, driving license copies	Personnel Records
VAT Records	Photocopier rejects (that contain confidential material)
Computer printouts (that contains confidential information)	Banking information
General letters and correspondence (that contain personal names and addresses or any personal or confidential information)	

This list is not exhaustive. If you are unsure, please seek the advice from the Data Protection Officer.

2.1 General Confidential Waste

- 2.1.1 It is your responsibility to dispose of confidential waste either by using an office based shredder or by arranging a special confidential waste uplift from Waste Services.
- 2.1.2 All offices must use a dedicated confidential waste bin or a cross cut shredder (with a DIN3 or DIN4 specification)
- 2.1.3 Confidential waste must never be disposed via recycling facilities.
- 2.1.4 Only shredded (cross cut only with a DIN3 or DIN4 specification) confidential waste can be disposed via regular waste or recycling facilities
- 2.1.5 Only paper must be disposed of via the confidential waste uplift process e.g. no plastic folders, lever arch folders, poly pockets etc
- 2.1.6 Only red bags should be used for confidential waste.

2.2 Confidential Waste Paper Procedure (DALKEITH CAMPUS e.g. Midlothian House, Fairfield House, DKSW (No11) and Eskdail)

- 2.2.1 All main offices have a cross cut shredders (with a DIN3 or DIN4 specification) for staff to dispose of their confidential paper.
- 2.2.2 Cross cut shredded waste must be disposed using clear plastic bags only. Once the shredder bin is full the bag must be removed, hand tied and placed in the blue (co-mingled waste) wheelie bins. Shredded waste must never be poured loose in to a bin. It is the responsibility of the person using the shredder to empty the shredded waste.
- 2.2.3 Replacement clear plastic bags can be sourced via the Campus Maintenance [Intranet](#) page.

2.3 Confidential Waste Paper Procedure (OTHER PREMISES) including care homes, schools, Social Work Centre's, Leisure Centre's etc

- 2.3.1 All other premises must have a dedicated cross cut shredder for staff to dispose of their confidential paper.
- 2.3.2 The Senior Manager within this premise should take responsibility for ensuring that there is a clear procedure for confidential waste in the building covering secure collection, handling and storage until either uplift by Waste Services or shredding.

2.4 Confidential Paper and Office Clear-outs

DALKEITH CAMPUS – Midlothian House, Fairfield House, DKSW (No11) and Eskdail

2.4.1 If an office would like to undertake a clear-out then they should contact Campus Maintenance via their [Intranet](#) page in advance who will supply red confidential waste bags and agree a suitable time for uplift.

2.4.2 It is the responsibility of those requesting the office clear out to securely store the waste (at all times) before the agreed uplift time.

ALL OTHER PREMISES) including care homes, schools, Social Work Centre's, leisure Centre's etc

2.4.3 If an office would like to undertake a clear-out then they should allocate a coordinator to liaise with Waste Management.

2.4.4 This coordinator should contact recycling@midlothian.gov.uk to agree a suitable date/time for the clear out to be undertaken.

2.4.5 Only red bags should be used for confidential waste clear-outs

2.5 Disposal of Confidential waste

2.5.1 This material is stored in the container until shredded by a contractor, who has signed a non-disclosure agreement, the confidential waste is then recycled into new paper products.

2.5.2 After this material is destroyed the contractor provides a Certificate of Destruction providing confirmation that all information within that container has been securely destroyed.

2.5.3 These certificates are stored for a 3 year period for auditing purposes.

2.6 Consequences of breaching this policy

2.6.1 The inappropriate disposal of confidential waste may lead to a breach of the Data Protection Act and have potential disciplinary consequences for those involved.

2.6.2 Any breach of the policy should be classed as a security incident and reported to the Data Protection Officer.