

**UNIVERSITY OF LONDON
RECORDS MANAGEMENT MANUAL:
BEST PRACTICE PROCEDURE No. 6**

DESTRUCTION OF CONFIDENTIAL PAPER RECORDS

1. Destruction of records: general principles

1.1 Destruction of any record produced by the University in the course of its activities, including confidential records, should only be carried out where authorised. There may be legal, administrative or archival retention requirements.

1.2 Provision of lists of categories of records destroyed and the authority under which they were destroyed is a requirement under the Freedom of Information Act 2000.

1.3 These requirements do not, however, apply to material routinely discarded in the course of an administrative activity i.e. duplicates, information material, rough drafts or ephemera.

2. Destruction of records: *confidential* material

2.1 Unless your office deals with financial or personal matters (e.g. staff or students) only a small proportion of the records you produce will be *confidential* (i.e. subject to restricted circulation and processing).

2.2 Any record produced by the University which is not in the public domain and which contains information on identifiable individuals should, however, be treated as *confidential*.

2.3 *Confidential* material may be subject to the Data Protection Act 1998 and will be subject to the Freedom of Information Act 2000.

2.4 An individual handling or processing *confidential* material should take personal responsibility for the proper disposal of such information.

3. Routine destruction of paper records within the University of London

3.1 Facilities Management has introduced blue, lockable bins to be used by staff for the destruction of *confidential* material.

3.2 These bins are located throughout Senate House and Stewart House.

3.3 The bins should be used for day-to-day destruction of any *confidential* material routinely discarded in the course of an administrative activity.

4. Scheduled, large-scale destruction of paper records according to retention schedules

4.1 The procedure outlined below applies to the records of the University of London's central administrative offices, responsibility centres, and to the School of Advanced Study.

4.2 The procedure is designed to be applied to the regular, systematic destruction of particular types of records at a time designated by the appropriate records retention schedule.

4.3 Where there is no retention schedule, Best Practice Procedure No. 9: *General Records Retention Schedule*, gives disposal provisions for general categories of records and may be used for guidance by staff seeking to destroy unwanted records.

4.4 Where large-scale destruction of records not yet covered by a retention schedule is desired, the Records Management Team should first be consulted to ensure that there are no legal or administrative retention requirements.

4.5 The Records Management Team will accept transfers of records which are causing congestion but which may not be destroyed immediately. Best Practice Procedure No. 7: *Transfer of paper records to semi-current storage*, should be followed in these circumstances.

5. What to do

5.1 E-mail records.management@london.ac.uk with a list of the categories of records you wish to destroy, with covering dates and reference to the relevant retention schedule. All notifications will be dealt with as quickly as possible.

5.2 Once agreement is secured by return e-mail, remove the material from its container and remove bulldog clips, plastic wallets etc.

5.3 Ensure that the waste is kept in a secure location pending transferral to the blue bins e.g. in your office.

5.4 Transfer the waste to the blue confidential waste bins (or use on-site shredders) provided in your Division/section.

University of London Records Manager

Procedure approved 9/9/02; amended 15/11/02; 30/1/03; 7/3/03; 6/05/05; 3/7/06; 25/9/09; 6/11/09;

APPENDICES

Appendix I: *Confidential* and non-confidential records: definitions. This appendix lists the main categories of records which are and which are not confidential.

Appendix II: Sample records destruction schedules. The samples are intended to give guidance on how to keep lists of records destroyed by staff in offices. It will be necessary to create and keep such lists for up to 10 years as proof of authorised destruction.

Appendix I: CONFIDENTIAL AND NON-CONFIDENTIAL RECORDS: DEFINITIONS

Note: Information held by a public authority is subject to the provisions of the Freedom of Information Act 2000. The Act includes various exemptions to the disclosure of certain types of information, which may include *confidential* information as defined in this document.

Unlikely to be confidential

Records or information thereof which is already in the public domain e.g.

- Mission statements
- Charters
- Constitutions
- Ordinances
- Statutes
- Regulations
- Published directories
- Internet websites
- Published minutes
- Published reports
- Press releases
- Prospectuses
- Timetables
- Presentation materials
- Course guides and outlines
- Publicity material
- Blank examination papers (post exam)
- Theses (accepted)
- Data which has been anonymised
- Published surveys
- Magazines
- Published circulars

Likely to be confidential

Records or information which contains personal information about a living individual e.g.

- Questionnaire or other data collected under a guarantee of confidentiality.
- Correspondence or other documents which reveal the contact details or any financial details of a named living person, unless permission has been given to circulate the details.
- Correspondence or other documents which reveal personal details or pass comments on a named living person.
- Staff personnel records
- Discipline records
- Student records
- Grant applications
- Job applications
- Interview notes
- Admissions records
- Redundancy records
- Sick pay records

- Maternity pay records
- Income tax and National Insurance returns
- Wages and salary records
- Accident books and records
- Health records
- Medical records

Information which, if made public before a certain period, may breach commercial confidentiality e.g.

- Contracts
- Tenders
- Purchasing records
- Maintenance records
- Insurance records
- Unpublished accounting records

Records which may breach intellectual property rights e.g.

- Unpublished research material, drafts and manuscripts.

Appendix II: SAMPLE RECORDS DESTRUCTION SCHEDULES

(a list on a spreadsheet or table is recommended)

[sample I]: **INSTITUTE OF [-]:****SCHEDULE OF RECORDS DESTROYED under Section 1 for accounting records of the INSTITUTE RECORDS RETENTION SCHEDULE (approved 26/2/03)**

Institute of [-] Studies		Section: Finance			
<u>Series Ref</u>	<u>Title of Record Series</u>	<u>Covering Dates</u>	<u>Schedule ref:</u>	<u>Date destroyed</u>	<u>Processed by</u>
-	Year end returns	1995	Section 1.2	14/1/03	Ann Smith
-	Orders: authorisations for payment	1995	Section 1.2	14/1/03	Ann Smith
-	Sales ledger invoices	1994-1995	Section 1.2	14/1/03	Ann Smith
-	Delivery notes	1994-1995	Section 1.3	14/1/03	Ann Smith
	Petty cash receipts	1995	Section 1.3	14/1/03	Ann Smith
	Cash receipts books	1995	Section 1.3	14/1/03	Ann Smith

[sample II]: [-] **DIVISION:**
SCHEDULE OF RECORDS DESTROYED according to the RECORDS RETENTION SCHEDULE for the Examinations Office

Division: [-] Division		Section: Examinations Office			
<u>Series Ref</u>	<u>Title of Record Series</u>	<u>Covering Dates</u>	<u>Schedule ref</u>	<u>Date destroyed</u>	<u>Processed by</u>
EX 1/99/1-12	Files on selection of examiners	1999	Section 6.4	12/1/03	F Bloggs
-	Registration forms	1996-1999	Section 6.8	14/1/03	
APP 94/1-7	Completed appeals	1994	Section 8.3	14/1/03	
-	PhD Entry Forms: A-Z	1993	Section 8.4	16/1/03	
-	Unclaimed certificates	1993	Section 8.5	16/1/03	