

# Guidance for producing a paper destruction and disposal policy

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## Acknowledgements



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## 1. Introduction

In addition to the widespread use of electric media, all organisations use paper documents. These are a mixture of historic and current information, formal and informal. Effective management of information includes management of paper documents, including how to destroy them at the end of their life. This paper provides example contents and wording for a policy covering the destruction of paper documents.

In the following sections, a brief explanation of the section and why it is necessary is given, and then example wording is provided (the example wording is boxed). This wording can be used as the basis for your own policy.

## 2. Purpose and rationale of policy

Organisations need to determine the purpose, rationale and goals for any policy. With respect to a Paper Destruction policy, there are two main possibilities:

- to ensure correct destruction of information (as part of standard Records Management policy).
- to reduce space and storage costs (by destroying paper while retaining the information by scanning or similar).

Either or both of these goals might be applicable for an organisation.

The purpose of this policy is to establish a framework for the destruction of paper documents. The policy provides three main benefits to an organisation:

- gives guidance and legitimacy to destruction and disposal of paper documents.
- ensures consistency of practice within an organisation.
- helps ensure that paper information is kept for the correct period of time.

## 3. Scope

This policy can apply to all paper documents. However, in some settings, additional policies may be needed for documents that contain especially sensitive information (eg, documents that are security classified as secret and higher).

This policy applies to all paper documents that are classified as Restricted and lower for the purposes of National Security.

## 4. Audience

The policy should be applicable to all personnel (i.e. staff, contractors, volunteers).

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## 5. Policy

### 5.1 Introduction

It is recommended that a simple classification be applied to all paper documents which enables them to be treated appropriately.

For the purposes of this policy, paper documents are considered to fall into three classes:

- A-type - Non-business documents - junk mail, flyers, etc.
- B-type - Business documents for which an authorised copy (eg. a scanned image) is an acceptable substitute.
- C-type - Business documents – for which an authorised copy is not an acceptable substitute.

Note that C-type documents are extremely rare in most UK businesses. In effect, authorised copies are always acceptable:

- so long as the authorised copies are produced by a process that is sufficiently well controlled (the degree of control depending on the importance of the information).
- unless a specific law, regulation or other instrument that requires the original is identified.

All paper documents created or acquired by an organisation are in one of these three classes. In most cases it is obvious which category should be used and the staff member will treat the document accordingly. Where there is any debate about the classification for a document, the records manager will make the final decision.

### 5.2 Method of destruction

Destruction may be done using a variety of methods. These include shredding, pulping and burning.

Any of these methods is satisfactory for the purposes destroying B and C type documents. The exact mechanism for destruction will be agreed by the records manager.

An organisation may choose to use an external company to help in the process. Only companies approved by the records manager will be used.

### 5.3 A-type documents

A-type documents can be destroyed at any time. They have no lasting business value and are not required to be kept for any period of time.

A-type documents can be disposed of in any way. If they are shredded, the resultant shredded paper can be recycled without the need for security precautions.

## 5.4 B-type documents

There are two situations in which B-type documents can be destroyed:

- in line with the retention schedule
- earlier than the date specified in the retention schedule provided an authorised copy has been successfully made. In this case the authorised copy will then be retained according to retention schedules.

B-type documents must only be destroyed using a means of destruction that is sufficiently secure. The degree of security needed depends on the importance of the information. A common option is to use a cross-cut shredder, disposing of the resultant shredded paper securely, via an approved document disposal company. An alternative is to use a secure destruction service.

## 5.5 C-type documents

C-type documents can only be destroyed according to the retention schedule. Any copies of this information must be destroyed at the same time.

C-type documents must only be destroyed using a means of destruction that is sufficiently secure. The degree of security needed depends on the importance of the information. A common option is to use a cross-cut shredder, disposing of the resultant shredded paper securely, via an approved document disposal company. An alternative is to use a secure destruction service.

## 6. Roles and responsibilities

For a policy to be effective, roles and responsibilities must be assigned. Exactly who is responsible for the different areas will depend upon an organisation and must be defined when implementing the policy. The following are the generic responsibilities that must be assigned to someone within an organisation.

### Authority for the policy

As with other corporate policies, the destruction policy must state that it is issued with the authority of the Board or of a named Director.

### Responsibility for maintaining the policy

To ensure that the shredding policy is maintained and relevant, someone must be assigned responsibility for ensuring that it is regularly reviewed and updated.

The responsibility is usually assigned to a senior manager.

### Responsibility for enforcing the policy

All personnel are responsible for following this policy as it affects them. A senior manager has overall responsibility for ensuring that this policy is being followed.

### Authorise destruction

Before destroying type B and C paper documents, someone must authorise that this is acceptable. There will be two authorisation steps involved:

1. Business authorisation to destroy the information.
2. Authorisation to destroy the physical document.

The business authorisation refers to approval that the information is no longer required. This authorisation is often given by the manager in the appropriate business area.

The authorisation to destroy the physical document follows business authorisation and simply states that the paper can be destroyed. The authorisation to destroy the paper is often the responsibility of the records manager.

### Destroy the paper documents

Someone must be assigned to destroy the documents.

This role will depend upon the organisational structure and also the nature of the documents.

Often the destruction process is performed by external parties.

- A-type documents can be destroyed by anyone (although many organisations simply have collection bins for paper which is then recycled or destroyed by an external party).
- B-type documents can only be destroyed by authorised people. An organisation may use an external party or may assign this to an administrative department.
- C-type documents can only be destroyed by authorised people. An organisation may use an external party or may assign this to an administrative department.

### Dispose of shredded paper

If documents are destroyed within an organisation, the destroyed paper must be disposed of in a secure manner.

This is usually done by an external party.

### Record of disposed documents

A record must be kept of all B-type and C-type documents that have been destroyed. This record forms part of the audit trail for the information. In most cases, the record is at a summary level, recording details of files or boxes destroyed. However, in some cases, for example highly sensitive documents, the record accounts for individual documents.

The responsibility for maintaining this log is usually with the records manager.

## 7. Legislative and policy framework

List related policies and legislation.

The following are related policies, regulations and legislation.

- Records Management Policy
- Retention Policy
- Retention schedule
- Shredding standards (eg, DIN 32757, US DoD)
- Policy for managing high sensitivity documents
- Legal admissibility of electronic information (eg, BIS10008:2008)

## 8. Appendix - supporting information

This appendix provides supporting information for this policy.

### 8.1 Retention schedules

This policy does not cover retention schedules, it simply supports the destruction of paper documents in accordance with any retention schedules.

Retention schedules specify how long information should be kept, and what the eventual fate of the information should be (i.e. destroy or keep indefinitely). Retention schedules are necessary to ensure that an organisation keeps information for the correct amount of time. The length of time is driven by three main areas:

- law or regulations that impose direct obligations (eg, DPA). There is no organisational discretion about the length of time to retain the information.
- evidential purposes eg, to deal with litigation challenges. An organisation has discretion about the period to retain the information.
- business purposes eg, learning from previous work. An organisation has discretion about the period to retain the information.

Based on these three areas, a corporate retention schedule can be developed that ensures that information is kept for the appropriate length of time.

### 8.2 Relationship of paper to copies of the information

It is important to be aware that, if a copy of the paper document exists (eg, scanned image, microfiche), then simply destroying the paper document does not mean that an organisation has disposed of the information – it still exists (albeit in a different format). Therefore, if the intent of the shredding process is to destroy the information (eg, as part of the retention schedule) then all copies must also be destroyed at the same time.

## Further information

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