DISPOSAL OF CONFIDENTIAL INFORMATION

Records should be destroyed in a timely fashion according to authorized Records Retention Schedules (RRS). If you do not have schedules for the records you wish to destroy, contact the University Records Management staff before disposing of any record.

Records containing information that is exempt from disclosure under the Ontario Freedom of Information, Protection of Privacy Act (FIPPA) and therefore not meeting the criteria for routine release must be protected from access during transfer and disposal.

Records containing personal information require the strictest security as follows:

- While in storage awaiting disposal or transfer (this applies to both internal or external contracted storage)
- While being transported to a destruction facility
- While in the custody of an external organization contracted to dispose of the records
- While being destroyed

While awaiting physical destruction, records that have been in active or semi-active records storage areas or facilities must be stored in enclosed locked rooms, containers or vehicles or housed in a secure warehouse. NO non-releasable records should be stored in an open unsecured place.

Removal of records from offices or from records storage areas to a secure facility for destruction must be made safely, securely and promptly in enclosed and locked vehicles.

Destroying Paper Records

Paper records must be destroyed in a manner that ensures non-releasable information is unreadable and non-reconstructable.

While destruction should be both cost-effective and environmentally friendly, it is most important that security be ensured.

Shredding is the most common method of destroying paper records. Records should be shredded in strips of 1 centimetre wide or less. Records may also be cross-cut, re-shredded or mixed with other record types to ensure information cannot be reconstructed and read.

After shredding or cross-cutting, the resulting material may be recycled or pulped.

Paper records are eligible for regular office recycling (being left in office blue bins awaiting collection) only if they contain information that has been determined to be
routinely releasable. Confidential, sensitive or personal information must not be placed in office recycling bins for destruction.

**Microforms and Computer Magnetic Media**

Microfilm, microfiche, magnetic computer tapes, compact disks and diskettes must be destroyed in a manner that ensures the information contained in the media cannot be reconstructed. Burning is considered the most effective method of destroying microforms, magnetic tapes and compact disks and diskettes. Contracted (bonded) companies who offer secure destruction of this type of material may be used.

**Online Electronic Data**

Electronic records located on your desktop computer, or online (on a database or network) should be deleted according to the applicable Records Retention Schedule (RRS).

Electronic records include: email, data located in applications files (such as word processing documents, spreadsheet workbooks, presentation slides, and so on); textual or imaged data maintained on databases; data in typographical, video, and/or audio formats contained on web-sites; and any other type of online electronic or digital data.

Great care must be taken when disposing of computer equipment. This includes USB keys and Personal Digital Assistants (PDAs). Ensure that ALL personal information and other non-disclosable information is scrubbed from the hard-drive before the equipment is transferred or otherwise disposed of. Simply deleting the documents etc. is NOT enough. Destroy small equipment so that it is no longer usable.

Contact the University Records Management staff for instructions on how to dispose of records on hard-drives.

For more information on the best practices for destruction of personal information see the fact sheet provided by the Information Privacy Commissioner of Ontario:

http://www.ipc.on.ca/images/Resources/up-fact_10_e.pdf