FRAMLINGHAM TOWN COUNCIL

DOCUMENT DISPOSAL POLICY

This Policy Should be read in conjunction with the Framlingham Town Council (FTC) Document Retention Policy
It has been drafted with reference to section 46 of the Freedom of Information Act 2000. And follows the best practise framed by the National Archives:
http://www.nationalarchives.gov.uk/documents/information-management/rm-code-guide8.pdf

1. Outline of Policy

Documents are disposed of for the following reasons:

- To follow the FTC Document Retention Policy
- Where they contain personal information no longer needed
- To clean files of excess paper or notes

When documents are disposed of, the method of disposal should be appropriate to the nature and sensitivity of the documents concerned. A record of the disposal will be kept to comply with the General Data Protection Regulations.

The following principles should be followed when disposing of records:

The General Data Protection Regulation 2018 requires that personal information must not be retained longer than is necessary for the purpose for which it was originally obtained.

Documents and files will be disposed of following the Framlingham Town Council Document retention Policy. (found here: https://framlingham.com/publicly-available-documents/)

2. Exceptions

Certain FTC records are not to be destroyed and are preserved indefinitely – a list of these is within the Document Retention Policy.

Records must not be destroyed if they relate to:

- A freedom of information request
- Any complaint, compliance breach, or internal matter that is ongoing and could result it litigation. (once resolved these are kept then destroyed in accordance with the document retention policy)

If records are destroyed despite it being known that they are still relevant to a live case, it may be an offence under section 77 of the Freedom of Information Act (FOIA)

3. Document Disposal Procedure

3.1 Documents need to be disposed of using the right method:

- Non-confidential records: place in recycling bin for paper recycling, or delete the files or records if electronic
- Confidential paper records or records giving personal information: shred documents using Cross Hatch Shredder (As in FTC office) then ideally mulched and or burnt.
- Confidential electronic records and files kept on a computer: use shredding software that overwrites data such as 'File Shredder' (*www.fileshredder.org*)

3.2 A record of what was destroyed and how it was disposed of needs to be kept

This is a hard copy, hand written account of the disposal of documents from files. For day-to-day disposal of duplicates, notes, or errors no record is required unless an original sensitive document is destroyed. In practical terms destruction of documents is best done in batches, and in conjunction with archiving, updating and cleaning of files. The information that needs to be logged is as follows:

- Date of Destruction
- Brief description of what is being destroyed
- Approximate date range the documents relate to – this can be month year to month year. This is important to prove that documents were not destroyed because of a freedom of information request.
- Name of person destroying the records
- Reason for destruction – **R**etention, **S**ensitive, **P**ersonal, **C**leaning.

A proforma for this record is attached to this document.

FRAMLINGHAM TOWN COUNCIL: RECORD OF THE DISPOSAL OF DOCUMENTS

Date of Disposal	What was disposed	Date range of data (MM/YY-MM/YY)	Method of disposal: **S**hred **R**ecycle **E**lectronic	Names of person destroying the document	Reason: **R**etention, **S**ensitive, **P**ersonal, **C**leaning