

**THE DUBLIN WELL WOMAN CENTRE**  
**Policy Document**

**Subject:** Data Destruction Policy

**Approved By:**

**Ref Number:** 004

**Effective Date:** 25/05/2018

**Target Group(s):** All

**Date of next review:** 25/05/2019

It is vital that the process of record disposal safeguards and maintains the confidentiality of the records. This can be achieved internally or via a DWWC approved records shredding contractor, but it is the responsibility of employees of the DWWC to satisfy themselves that the methods used provide adequate safeguards against accidental loss or disclosure of the records.

**Relevant Legislation:**

Data Protection Acts 1988 to 2018.

General Data Protection Regulation May 2018

**Register of Records Destroyed**

A register of records destroyed must be maintained as proof that the record(s) no longer exist, but was at some stage held by the DWWC.

The register should show:

- Name of the file
- Details of the patient, i.e. full name, address, date of birth (if a patient file)
- Healthcare record number
- Former location of the file
- Date of destruction
- Name of the authority which authorised disposal of the records

For further information on this please see 029 Processing Paper Medical Files policy.

**What is Confidential?**

Any records containing personal identifiable information such as name, address, date of birth, PPS number, employee number, or medical record is deemed confidential. Other records may also be confidential if they contain information about DWWC business or finances.

**How to Dispose of paper records**

All Clinics are fit out with a Cyclone Confidential Shredding Depository. These are collected monthly by Cyclone, and are shredded in the van on site. They will supply a Certificate of Destruction upon completion and this must be kept and filed for Data Protection purposes

### **Procedure:**

- 1.** Any paperwork that has personal identifying or confidential information must be disposed of by placing it in the cyclone shredding depository. This includes names, DOB, test results etc.
- 2.** These depositories are locked and secured. In an emergency (like if you have placed a consent form with a patients' signature on it in by mistake) a manager can open the bins.
- 3.** In the event a depository is opened, the manager must make a note of the time and date, and attach it to that month's certificate of destruction
- 4.** The certificates of destruction must be sent to head office once a month where they are scanned into the Certificates of Destruction folder in the Governance and Compliance Folder on the Admin Drive.

### **How to dispose of electronic records**

Destruction of electronic records will be deleted in such a manner that will render them non-recoverable even using forensic data recovery techniques.