Managing Printed Materials

Personal data often needs to be included on printed documents such as induction lists, CVs for interviews, passenger lists, etc. It is important that these physical documents are kept secure in order to protect the personal data that is in our care. Loss of documents containing personal data constitutes a data breach that would need to be reported to the Information Commissioner's Office. In order to mitigate the risk posed by printed documents, the following rules must be followed when personal data is printed.

Printing

Documents which contain personal data should contain the following or similar words in the header of footer, which should be printed out on every page:
'Restricted – this document must be locked away when not in use, and shredded when no longer required'

Where the header of footer cannot be edited, this should be handwritten on the document, stamped, or added as a watermark when printed.

Transporting

When transporting hard copies of documents, ensure they remain secure and cannot be seen. Put them in an opaque folder or envelope. Ideally, they should be carried in a lockable bag, or posted using registered postage that requires a signature.

Storing

In an office or home office environment, documents containing personal data should not be left on an unattended desk in any circumstance, even if they are not immediately visible to a passer-by. When these documents are not being used, they need to be stored in a lockable cupboard or drawer. The key needs to be stored in a secure location, preferably away from the cupboard and not in an obvious place such as the top of the cupboard or in a nearby tray. If a key safe exists, this would be a good place. The cupboard should also be in a room that is locked when not in use.

Sharing

If you need to pass on documents to another person, ensure that the recipient is made aware of the status of the documents and the need to keep them safe.

Destroying

When the documents are no longer required, they should be destroyed securely, either by shredding in a suitable cross-cut shredder or placed in a secured location for processing by an approved service provider. If necessary, documents should be brought back to a location where secure disposal facilities are available.

Breaches

If documents containing personal data are accidentally left somewhere, this must be reported to the Data Protection Officer as soon as you become aware of the problem. The DPO will decide what action must be taken.