Media Disposal Policy

Media Disposal Policy
Sponsor: Office Manager
Version 1.0 (October 2025)
Next review: (October 2026)

MLA College is committed to helping achieve the United Nations Sustainable Development Goals.
Whilst consideration has been given to the design of this document to reduce the use of printer ink and paper, please consider the environment before printing and only do so if absolutely necessary.

Version	Date Approved	Author / Owner Approving Authority	Summary of Changes	Next Review Date
1.0	01/10/2025	Office Manager	Initial Release	01/10/2026

Content

1. Introduction
2. Purpose and Scope
3. Glossary Terms
4. Responsibilities
5. Media Disposal Requirements
6. Disposal of Media Type
7. Violation of Policy
8. Legal and Regulatory Framework

1. Introduction

1.1 This document describes MLA Colleges policy for the secure and proper disposal of digital and physical media in line with UK GDPR / Data Protection Act 2018 and all relevant environmental legislations.

2. Purpose and Scope

2.1 The purpose of this policy is to outline approved methods of media disposal at MLA College. These rules are in place to protect sensitive information, employees, students, partners and the organisation. Inappropriate disposal of MLA College information may put the individual and the College at risk of data breaches, reputational damage, or legal consequences.

2.2 This policy applies to:

- All MLA College Employees (permanent and temporary)
- Contractors, consultants, and third parties handling MLA College data
- All physical and digital media containing MLA College or partner information

3. Glossary terms

3.1 Protected Data includes the following:

- **Personal Data**- Information relating to an identifiable living person, either on its own or combined with other data (e.g. full name, address, date of birth).
- **Sensitive Data**- Personal Data that falls into special categories such as health, race, ethnicity, or other protected characteristics.
- **Student or customer data**- Confidential or business sensitive data entrusted to MLA College, such as course submissions, research data or student data records.
- **MLA College Internal Data**- Confidential or business-sensitive data owned by the college, including HR information, financial data, intellectual property and internal documents.
- **Overwriting/Zeroing-** Replacing existing data with random or meaningless data to render it unrecoverable. Tools such as Kill disk or Symantec Gdisk can be used for this process.
- **Destruction-** Physical destruction of media so it is unusable by any device (e.g., shredding, crushing, removal by appropriate body. There are designated ‘confidential waste’ bins in the office.
- **Degaussing –** Magnetic erasure of data from media such as tapes or floppy disks using specialist equipment.
- **Cryptographic Erase / Encryption** – Using cryptographic features to erase keys from self-encrypting drives, making data unrecoverable. This can also include applying full-disk encryption followed by reformatting.

4. Responsibilities

4.1 All MLA College staff, contractors, and third parties are responsible for complying with this policy. Any media in their possession must be disposed of using the approved methods outlined in Section 6. Disposal activities must be reported to the Office Manager for tracking and compliance purposes.

4.2 Deliberate or negligent breaches of this policy may be treated as gross misconduct and may result in disciplinary action, up to and including dismissal. Where applicable, breaches may also result in civil or criminal proceedings under UK data protection law.

5. Media Disposal Requirements

5.1 All electronic and physical media containing Protected Data must be securely sanitised before being transferred, recycled, or destroyed. The correct disposal method depends on the media type, as outlined previously.

5.2 In the event MLA College donates outdated equipment this must only be approved by the Ceo, Rector or Vise Rector's, there is no exception. All media must be sanitised in accordance with this policy.

6. Disposal by Media Type

Hard Disk Drives (HDDS)

- Overwriting / zeroing
- Destruction
- Degaussing
- Cryptographic Erase / Encryption

Solid State Drives (SSDs)

- Overwriting / zeroing
- Destruction
- Cryptographic Erase / Encryption

Solid State Drives (SSDs)

- Overwriting / zeroing
- Destruction
- Cryptographic Erase / Encryption

CDs / DVD's

- Destruction
- Secure shredding

Floppy Disks and Magnetic Tapes

- Destruction
- Degaussing

USB Memory Sticks and External Drives

- Destruction
- Cryptographic Erase / Encryption

Mobile Devices (phones, tablets)

- Destruction
- Cryptographic Erase / Encryption
- **Paper Documents**
- Secure shredding

7. Violations of Policy

7.1 Improper handling or disposal of media may result in disciplinary action. Where a breach involves personal data, the College may be required to report it to the Information Commissioner's Office (ICO) in line with UK GDPR. Serious breaches may also lead to legal proceedings.

7.2 Should there be reason to believe that proper disposal procedures have not been followed, the incident must be reported immediately to the Office Manager.

8. Legal and Regulatory Framework

8.1 MLA College is committed to complying with all relevant UK legislation and regulatory requirements governing the secure disposal of media. This policy supports compliance with the following:

- **UK General Data Protection Regulation (UK GDPR)** – Requires personal data to be processed securely and lawfully, including its erasure or destruction when no longer required, to prevent unauthorised access, loss, or disclosure.

- **Data Protection Act 2018** – Supplements the UK GDPR and sets out specific provisions for the handling, retention, and secure disposal of personal and special category data.

- **Environmental Protection Act 1990** – Imposes a duty of care on organisations to ensure waste, including media and IT equipment, is managed and disposed of responsibly.

- **Waste Electrical and Electronic Equipment (WEEE) Regulations 2013** – Requires the proper recycling, recovery, and environmentally sound disposal of electronic equipment and components.

- **Computer Misuse Act 1990** – Provides offences for unauthorised access to computer material; improper disposal of media could facilitate such offences if data is not securely erased.

- **Freedom of Information Act 2000 (where applicable)** – Requires public bodies and institutions to manage and dispose of records in a manner consistent with transparency and accountability.

- **Information Commissioner's Office (ICO) Guidance** – Provides best practice standards for the secure destruction of personal data, including physical destruction, overwriting, and encryption-based methods.

8.2 MLA College will review and update this policy as necessary to remain aligned with changes in legislation, regulatory guidance, and industry best practice.