



Data Destruction and Sanitization Policy

1. Overview

CWL regularly collects sensitive information on computer hard drives and other forms of electronic media. As new equipment is obtained and older equipment and media reach end of life, sensitive information on surplus equipment, and media must be properly destroyed, and otherwise made unreadable to protect confidential information or personally identifiable information (PII).

2. Purpose

Proper disposal and disposition of surplus computer hardware and other storage media, manages risks of security breach and inappropriate information disclosure. Broadly, exposure to the agency takes the form of:

- **Unauthorized Release of Confidential Information or PII** (personally identifiable information) - allowing an unauthorized person access to confidential information.

This policy is designed to address proper disposal procedures for confidential information and/or PII from CWL's waste collections prior to their reuse/recycle. Proper sanitization and disposal procedures are key to ensuring data privacy and license compliance.

3. Scope

This policy applies to all CWL staff.

4. Policy

A. General

The transfer or disposition of data processing equipment, such as computers and related media, shall be controlled and managed according to ISO 27001 standard guidelines. Data remains present on any type of storage device (whether fixed or removable) even after a disc is "formatted", power is removed, and the device is decommissioned. Simply deleting the data and formatting the disk does not prevent individuals from restoring data. Sanitization of the media removes information in such a way that data recovery using common techniques or analysis is greatly reduced or prevented.

B. Data Disposal Procedures

All desktop computers, laptops, hard drives, and portable media must be processed through CWL's standard operating sanitization procedure for proper disposal. Paper and hard copy records shall be disposed of in a secure manner as specified by the archiving and destruction policy. The Data Sanitization Controller shall ensure procedures exist and are followed that:

All reusable media devices have an integrity test performed to evaluate its final disposition.

- 1: Failed devices go straight for shredding.
- 2: Passed devices go straight for sanitization for reuse.

- CWL's Data Sanitization Controller is MD Nigel Thompson & Joanna Mendry.

- **Physical Print Media** shall be disposed of inhouse by using CWL's in house paper shredder which has a DIN security level of P-2.
- **Electronic Media** (physical disks, tape cartridges, CDs, printer ribbons, flash drives, printer and copier hard-drives, etc.) shall be disposed of by one of the methods:
 - *Overwriting Magnetic Media* - all devices are overwritten via Adisa Standard 8.0 certified software. Any device that fails to complete must be shredded.
 - *SSD's (Solid State Drives) and Hybrid drives* – all devices are overwritten via Adisa Standard 8.0 certified software. Any device that fails to complete must be shredded to destroy each NAND cell.
 - *Physical Destruction* – involves processing items through CWL's industrial shredder, which produces an average shred particle size of 35mm. Additionally, a small shredder is used to destroy each NAND cell, ensuring complete data eradication.

IT equipment holding confidential data or PII (Personally Identifiable Information) must undergo secure sanitization (data clearing/destruction) before being disposed of or released as surplus to prevent data breaches, with methods ranging from secure erasure to physical destruction, as simple deletion or formatting isn't enough.

5. Audit Controls and Management

CWL document procedures can provide evidence of practice in the following ways:

- A log of all activity is kept on file which confirms the erasure process and the state of the drive.
- CWL implements a rigorous internal audit process to ensure every hard disk drive (HDD) has been successfully wiped. The Data Sanitization Controller is responsible for inspecting each HDD to confirm the correct procedure has been followed. This verification is performed using ADISA Standard 8.0 certified software, which produces a formal proof of data destruction.

6. Enforcement

Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

7. Distribution

This policy is available for viewing in files located in the Administration Office and is also held in the ISO 27001 file, and reviewed at least annually.

8. Policy Version History

Version	Date	Description	Approved By
1.0	19/12/2017	Initial Policy drafted.	Rebecca Doolan
2.0	20/12/2017	SSD description updated in section in 4. b.	Rebecca Doolan
3.0	26/02/2018	Hybrid hard drive included in section 4.b and confidential paper waste service provider amended.	Andrea Lee
4.0	10.12.2019	Paper is shredded in house.	Andrea Lee
5.0	19.05.2021	CWL no longer have the cross-cut shredder, but the more robust industrial paper shredder which has security DIN level P-2. The managing director is the data sanitization controller.	Nigel Thompson
6.00	21.03.2024	Added Joanna Mendry as a Data Sanitization Controller.	Nigel Thompson
7.00	08.07.2024	Sanitization method update.	Nigel Thompson
8.00	28.08.2024	Shred size has been reduced to 35mm and reference to the destroyinator removed.	Nigel Thompson
9.00	28.04.2025	Small shredder installed to destroyed M.2 (SSD) / NAND cells.	Joanna Mendry
9.00	29.04.2025	New Adisa Standard 8.0 certified sanitization software. Redkey no longer in use.	Joanna Mendry
9.00	29.04.2025	Sanitization method updates in section 4. b.	Joanna Mendry
10.00	09.01.2026	SSD's (Solid State Drives) and Hybrid drives and Physical Destruction description update in section 4. b.	Joanna Mendry
10.00	09.01.2026	Audit Controls and Management description update in section 5.	Joanna Mendry

Date: 09.01.2026

Signed by Nigel Thompson:

