We have developed these guidance notes, to assist you in safely and securely transporting your data, when organising an office move. Personal data can easily be left behind or mislaid, causing damage and distress to the individuals affected, and possibly resulting in a fine for the University.

A monetary penalty notice of £185,000 was served on the Department of Justice Northern Ireland after a filing cabinet containing details of a terrorist incident was sold at auction – the Department were organising an office move, and all unwanted/unnecessary furniture was sold at auction. Unfortunately this particular cabinet had not been checked before leaving the office and contained information about incidents from the 1970s to 2005, injuries sustained by people as a result of terrorist activity, compensation given to families, address details etc.

Kent Police were fined £100,000 by the ICO, after highly sensitive and confidential information, including copies of police interview tapes, were left in a basement at the former site of a police station and found by the purchaser of the building.

As the above points highlight, the ICO take a very serious view of incidents such as these and impose fines accordingly.

To avoid such an incident occurring at the University, please consider the following points before you start to co-ordinate an office move:

- You should nominate a person to co-ordinate/oversee all information security/data protection issues regarding a move. This person can ensure that any necessary documents are completed and that processes are followed correctly. It may be necessary to delegate duties to identified Supervisors and Managers and all involved must take responsibility for the security of any personal data at throughout the moving process.

- Use the opportunity to review the data you have in your possession (in both electronic and hard copy). Review it against the University’s Records Retention Schedule and HR Services Guidance for managers on the retention of staff records and securely dispose of data that you no longer need.

- Start disposing of documents before you move – there is no point packing and un-packing documents which you no longer need. Perhaps organise for some disposal bins in the corridors (not for sensitive information). If you’re not sure if it is sensitive, err on the side of caution.

- If you are disposing of hard copy data, and don’t have a shredding machine to use locally, or the volume is too great, then the University have a contract with Shred it, who handle all our confidential and sensitive data disposal. If you contact Simon Atkinson (65963) he handles the contract that we have with them. Your local DPG has a spreadsheet listing all shredding machines and shred it consoles in your area, and will be able to direct you to the nearest one. If the job is of a larger scale, which requires several bags of documents to be disposed, you can contact Shred it to arrange to come and collect them and shred them on site. If you go down this route, you must not use blue bags to dispose of confidential or sensitive data. Importantly, you must have somewhere secure to store the bags whilst you are waiting for them to be collected e.g. a locked room.
• Note that the consoles and white sacks must not be used to dispose of any disks, CD’s or other media. Shred-It can destroy these items but they need to be packed in a different type of sack.

• PC’s, monitors, printers, etc. that are no longer required should be stored securely somewhere where they can be collected and disposed of in accordance with the WEEE Regulations. Please ensure that any information stored on hard disks is backed up if there is a chance you will need it in the future. Devices must be held securely until collected by I.T. Services. They can ensure that any confidential or sensitive information is wiped and securely disposed of.

• Make sure you thoroughly check all furniture is clear of documents – desk drawers, filing cabinets etc. You must not leave documents behind. Furniture full of documents cannot be moved, so ensure you empty everything into crates/boxes before removal and make a clear note where the documents are from (eg Grey filing cabinet number 3, drawer 1) so they can be easily be put back on arrival. Any lockable drawers should be locked and the keys clearly marked and stored securely.

• Thoroughly check all rooms that you are vacating – do you have a basement, or storage area near the office? Again, you must not leave data behind, ensure you review against the retention schedules and process accordingly.

If the data you are moving is sensitive/confidential, you should restrict access to, clearly label it, and ensure that it is stored securely and accompanied when moved.

The person responsible for the safekeeping of records must make sure that retained records are transported and stored appropriately. If records will be lodged with another person, they must agree to accept responsibility and provide suitable safe storage facilities.

• If you believe the data you have should form part of the University archive, then please contact James Peters (55306) for further advice and guidance

• If you have documents that you do not wish/are not able to dispose of but not keep in the office – the University now has a contract with a company called Iron Mountain, a records storage company. They will transfer paper documents to be stored off site. You can request retrieval of documents, but there is a fee for this. Enquiries regarding the use of Iron Mountain should be directed through the Records Management Office (ext 58111)

• You need to be equally vigilant about electronic data – do you have USBs and other devices containing data? Do you have a log of all the equipment you should have and its contents? If the data is sensitive, then it must be stored on an encrypted USB, laptop or other device. You must be able to account for all the devices, if it is not necessary to move them with the data on, securely delete the data before storing them securely for the office move. If you need to transport them with data on, be extra vigilant in the transporting of them – double check you have everything on arrival that you packed away.

• On arrival in your new office, locate keys for locked drawers, desk and filing cabinets etc; ensure you have the necessary security on your office doors if this is not there, contact the
Estates helpdesk (+44 (0) 161 275 2424) to arrange, ensure all partners know your new address; ensure the post room have been informed of your new address.

- You may not be moving an entire department, but perhaps supervising an individual leaving the University, and hence, their office. Here, line managers should complete the staff exit checklist with the member of staff:
  This document also highlights the need to archive or securely dispose of personal data that staff used, stored, or had access to.

- http://documents.manchester.ac.uk/display.aspx?DocID=12907 This safety services document can provide further guidance about safely moving equipment and materials.
**EXAMPLE DATA CHECKLIST**

<table>
<thead>
<tr>
<th>Record Type</th>
<th>Sensitive personal data Y/N</th>
<th>Retain by (name) (Person must have agreed to accept responsibility)</th>
<th>Transfer to (name) (Person must have agreed to accept responsibility)</th>
<th>Securely disposed of (details of hard or electronic copy, company used etc.)</th>
<th>Action required by (name)</th>
<th>Date action completed</th>
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<tbody>
<tr>
<td>Sickness records</td>
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<td>PDR notes</td>
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<tr>
<td>Files and notes from training courses attended</td>
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<tr>
<td>Mitigating circumstances notes</td>
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<tr>
<td>Meeting minutes</td>
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