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<b>Policy Title:</b>	Clear Desk Policy
<b>Description:</b>	Policy outlining the policy at Marino Institute of Education regarding a 'clear desk' approach to paper and confidential materials.
<b>Author (Position):</b>	DPO
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## Marino Institute of Education Clear Desk Policy

### 1. Introduction

Marino Institute of Education (MIE) is obligated under Data Protection laws, as well as having legal and contractual responsibilities for information security, to protect and secure all forms of personal data pertaining to natural and legal persons.

It is the policy of MIE to operate a clear desk approach regarding paper and confidential materials, and staff are aware that they should never leave personal or sensitive information on their desks or in any area where it may be seen or accessed by an unauthorised person.

### 2. Purpose of Policy

The purpose of this policy is to ensure that staff are aware of the reasons for operating a clear desk environment and to protect any personal information held or processed by MIE. Staff may have internal and external visitors to our offices, and it is therefore important to prevent personal or confidential information from being left unattended.

MIE is committed to the protection of personal information, including that of students, staff, etc and, as such, utilise electronic systems for data reading and access where possible. Due to the nature of our work, it necessary for the Institute to retain some sensitive information and a large amount of personal information relating to students, as well as staff. Our **Data Protection Policy and Procedures** provide controls and measures for securing this type of information.

### 3. Scope

This policy applies to all staff within MIE and pertains to the processing of personal information.

### 4. General Principles

MIE is committed to ensuring compliance with the rules, standards and regulations as laid out by its regulating and governing bodies and the Institute's objectives. Having a Clear Desk Policy enables the Institute to maintain an effective workplace and secures the personal information that must be held. MIE has a full understanding of the requirements to protect personal information and believes that having a clear desk environment is pivotal to this end.

#### ***MIE's objectives regarding clear desks are to:***

- improve information security and the protection of personal data;
- abide by GDPR requirements and Principles;

- ensure that personal and/or confidential information is locked away where there is a requirement to print it or where it has been received in a paper format;
- redact paper information as far as possible when it pertains to personal information that exceeds our requirements and needs;
- demonstrate an effective and efficient workplace to visitors, clients and regulators;
- protect staff and student information and rights;
- prevent accidents resulting from clutter and an untidy workplace;
- create a stress-free, clear and tidy environment for our employees;
- reduce paper use and recycle where possible;
- reduce the use of toner inks for the printer;
- reduce the storage space for paper information and archiving resources.

## **5. Measures and Controls**

Staff are continuously reminded that personal information should not be printed unless necessary, however, due to the nature of the Institute's work and services, paper formats of confidential information are received on occasion. In such instances, where they are required to be on a desk for any duration of time (*ie for administration or data entry purposes*), MIE provides secured, locked desk drawers and filing cabinets where paper can be stored should the user be away from their desk. Staff are aware that clear desks are in operation at all times, and paper information is either locked away or destroyed when leaving the office unattended.

At the end of the working day, all staff are expected to tidy away sensitive papers into locked desk drawers and filing cabinets. Secure office storage is available from the Estates and Conferencing department. MIE has a Records Management Policy and Records Retention Schedule that outline records retention periods for all information and procedures for destruction of records. Secure off-site storage may be arranged through the Education Office.

As well as personal information relating to students and staff, all paper formats (including those used to write information down) can be considered private or personal information and are subject to the same policy governance rules. Such documents can include, *but are not limited to*:

- telephone notes
- printed emails
- notices and minutes of meetings
- disciplinary letters

- references
- accounting paperwork
- draft letters
- report and management information
- registers and visitor sign-in books, etc.

### **5.1 Guidelines**

Staff are provided with guidelines outlining data protection/GDPR obligations not to keep personal information for longer than is necessary (ref Appendix). MIE uses a shredding service for confidential hard copy material. Shredding cabinets are available at the Finance Office, Registrar's Office, Education Office and Main Reception. Paper materials awaiting shredding should be secured in a locked filing cabinet until destruction.

Staff are advised to keep their desks clear of unnecessary paperwork, and are provided with a secure desk drawer or filing cabinet as required.

### **6. Responsibilities**

MIE provides guidelines to support the implementation of this Clear Desk Policy. Management is responsible for a top-down approach, and for ensuring that all staff are included and have the support needed to meet the regulatory requirements in this area. All staff should take personal responsibility for ensuring the security of personal data. Where confidential information is exposed, the situation will be dealt with in line with the staff disciplinary policy.

### **7. Implementation and Review**

The policy will be reviewed and evaluated by the Data Protection Officer.

**Appendix: [Clear Desk Checklist](#)**

<b>Clear Desk Checklist</b>	<b>Y</b>
<b>1. Electronic records</b>	
- View, share, and manage documents electronically whenever possible to reduce the need for physical copies.	
<b>2. Printed material</b>	
- Do not leave notes, printouts, or post-its with sensitive information visible to others.	
- Print physical copies only when necessary.	
- Immediately remove all printed documents (originals & copies) from printers or copiers.	
<b>4. Secure storage</b>	
- Check that filing drawers and cabinets containing sensitive and confidential material are locked when not in use or unattended.	
- Lock away storage and portable devices, such as laptops, when not in use.	
- Secure off-site storage may be arranged through the Education Office.	
<b>5. Dispose of sensitive information</b>	
- Do not put sensitive documents in the regular waste or recycling bin.	
- Dispose of sensitive papers using MIE’s designated secure confidential disposal facility (available in Finance, Registrar’s and Education Offices, as well as Main Reception).	
<b>6. Computers</b>	
- Ensure that computer screens are angled away from unauthorised persons.	
- Set up a timed screensaver to avoid sensitive information being visible when you are not working at your monitor.	
- Log out and secure your computer when you are leaving your workspace.	
<b>7. Passwords</b>	
- Handle passwords securely.	
- Do not write down or store passwords in an easily accessible place at your desk or in your office.	
<b>8. Clear desk and space</b>	
- Always try to keep your desk as clear of confidential material as possible.	
- Use designated lockable drawers or cabinets for documents when not in use. * If you do not have access to secure storage, please request same from the Estates and Conferencing department.	
- Check that all confidential or sensitive documents are securely filed or locked away before leaving your desk, especially at the end of your workday.	