



# Data Disposal Attitudes and Practices (2010 – 2011)

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## **Executive Summary**

Between June 2010 and November 2011, NAID-Europe commissioned five research projects designed to shed light on attitudes and behaviors of decision makers regarding the secure destruction of discarded sensitive information.

Of course, the secure destruction of discarded hard copy and electronic media is critical to protecting personal information, and not doing so is one of the most common ways such information is accessed by unauthorized individuals.

While media coverage of incidents of improper disposal is high, the research attempted to demonstrate whether such incidents were simply aberrations or a general disregard for the secure disposal of sensitive information.

### **What is NAID-Europe?**

NAID-Europe is a regional chapter of the National Association for Information Destruction (NAID), a non-profit trade association for the secure destruction industry that promotes the proper disposal of personal and competitive data on discarded paper and electronic media. NAID is supported by more than 1,800 member locations globally, with more than 110 member locations making up the NAID-Europe chapter.

To increase awareness on this important and often overlooked area of data protection, NAID produces a wide range of educational materials, develops and enforces security and ethical standards for its members, and commissions data disposal topic research around the world.

### **The Research**

The research from which the results were produced consists of two separate and distinct projects: a Consumer Data Disposal Attitudes Study and a Disposal Habits Study.

#### *Consumer Data Disposal Attitudes Study*

In the autumn of 2010, NAID-Europe commissioned London-based Circle Research Ltd. to conduct a study of organizational decision makers' knowledge and attitudes on information disposal.

The studies were conducted in Spain and the Netherlands to obtain some element of regional diversity. The survey explored business leaders' awareness of data protection legislation, data destruction requirements, risks associated with improper disposal, and their responsibility to properly assess data-related vendor qualifications.

The study also sought to learn the priority level organizations placed on data protection policies and employee training as well as the decision makers' sense of fear that penalties or other negative consequences would result from violations of data protection requirements.

In the countries studied, the Consumer Data Disposal Attitudes Study showed a significant portion of organizational decision makers were either unaware of, or gave a low priority to, data protection in general, with an acute lack of awareness and concern for proper secure disposal.

- In Spain, for instance, 41.3% of organizational decision makers reported they had limited or no knowledge of the country's data protection directive.
- In the Netherlands, 47.5% reported they were unaware that the data protection directive applies to all personal data, including employee data.
- Even though the data protection directive specifically requires organizations to have written information protection policies and training, 36% of Dutch decision makers and 53.5% of their Spanish counterparts were unaware of any such written policies or training within their organizations.
- 23.3% of Spanish decision makers and 34.5% of Dutch decision makers did not believe that identity theft could result from unauthorized access personal information that was improperly discarded.
- 74% of Spanish respondents and 68% of Dutch respondents believed their organizations were not at a serious risk of being fined or penalized if they were found to be casually discarding personal information in an unsecure manner.

#### Disposal Habits Study

In the last half of 2011, NAID-Europe had licensed private investigators examine the contents of publicly accessible trash receptacles used by specific organizations that have obvious data protection burdens to determine the availability of illegally discarded personal information. This study was conducted in Madrid, Spain, and London, England, from July through November 2011.

In essence, the Disposal Habits Study is the behavior snapshot reflecting the results of the Consumer Data Disposal Attitudes Study the prior year. In an environment where there is low awareness of data protection requirements and little to no fear of enforcement, it is not surprising that such a large number of organizations were casually discarding sensitive personal information with seemingly no regard for the people (customers and employees) they were putting at risk.

In London, for instance, the random trash audits showed 44% of organizations, each with a high legal burden to protect personal information, were casually discarding personal information.

Included among the findings were the following:

- A leading private hospital discarded the personal medical records of 70 patients, including their names, addresses and details of their treatment.
- All four law firms whose commercial trash bins were subject to investigation were found to have personal client details in their trash. At one top law firm, a 20-page document was found in a bag on the pavement, which detailed the case of a girl with mental health problems who had been taken into foster care.
- Outside the store location of a national chemist chain, the trash contained 20 prescription labels that included patients' names, addresses, and medication prescribed. Some also included doctors' names, patients' dates of birth and information about future requirements for medication.

In Madrid, the contents of the commercial trash bins were even more disturbing. In fact, 100% of the commercial bins subject to the random analysis contained personal information; intact and easily retrievable.

The organizations that were randomly selected from the list of potential targets consisted of bank headquarters, doctors' offices, medical laboratories, hospitals, law firms and government offices among others. All such targets had a high data protection responsibility due to the nature of their operations.

Often investigators found some shredded materials, indicating that organizations were aware of their responsibility and had provided some solution. In other cases, there were signs that some documents had been torn by hand. Even in these cases, however, a significant amount of unshredded personal information was available.

## **Conclusions**

The proper destruction of discarded information remains one of the most neglected and underappreciated areas of data protection. While organizations make strides to better protect personal information during its useful life, the higher level of care often evaporates when it comes time to discard it. This practice is especially concerning because that means every employee is given discretion to decide how to discard incidental information, making the organizations and its customers and employees vulnerable.

Ironically, in the Consumer Data Disposal Attitudes Study, most decision makers thought penalties for putting personal information at risk should be met with higher fines and more enforcement. From responses to other questions, NAID-Europe determined that decision makers want more fines and enforcement because of the following: while there was not basis for this attitude, survey respondents tended to rate their organization as being more responsible than the general population of organizations when it came to data protection (and thus not at risk of the higher fines and enforcement); and they realized that data protection behavior, especially in the areas of policy development and employee training, would not improve unless the negative consequences of ignoring it were taken seriously.

In comparing the results of the Consumer Data Disposal Attitudes and Disposal Habits Studies, the obviously missing links are policies, training and appreciation for the amount of data discarded in organizations.

Just as clearly, the lack of direction and enforcement are the key ingredients missing from the regulatory side of the equation. Organizations will not put a higher priority on data protection (including data destruction) policies and training until the result of not doing so is too painful to risk.

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A more extensive report about NAID-Europe's findings is available upon request at no charge. Please contact, NAID-Europe at [info@naid-europe.be](mailto:info@naid-europe.be) or 32-2 808 0364.