

# New York Shredding

New York Shredding

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Information Destruction

Operational Policy & Procedures Manual

# New York Shredding

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## 1 PLANT-BASED DESTRUCTION FACILITY PROCEDURES

### 1.1 Access to Facility

This company desires to keep a secure environment for all employees with the following rules and regulations:

- Only Management and designated employee representatives will be allowed to have keys to the facility.
- Employees are not allowed on New York Shredding's property after hours without prior authorization from Management.

### 1.2 Security Measures at the Facility

In addition to the access limitations, New York Shredding utilizes the following security measures:

- Perimeter doors to New York Shredding should be secured at all times. Visitors and employees that do not have the security lock combination will be advised by signage to alert the occupants of their presence by pushing a doorbell.
- The use of cameras at New York Shredding in areas where confidential materials are located is prohibited without prior authorization from Management. This includes mobile phone cameras.
- Employees are forbidden from possessing firearms on the premises of New York Shredding. Any employee found violating this policy will be dismissed.
- The outside lights are to be automatically set to be on from dusk to dawn, and inside security lights are to be left on whenever the facility is unattended. It is the responsibility of the Shift Supervisor to control the lighting and to see that all the lights are in working order.
- The fire and burglary alarm shall be activated whenever the facility is left unattended. The contact individual at New York Shredding, when an alarm is activated, is a Management/Access individual.
- New York Shredding has installed closed circuit internal video security to monitor the ingress and egress from the secured areas of the building. In addition, recorded closed circuit video monitoring with sufficient clarity to identify people and their activity is used at New York Shredding in the secured area of the building during the working hours. All monitoring data or tapes will be saved for a minimum of 90 days.
- New York Shredding has ensured that there is a secure area within the building devoted only to destroying media. No baling of non-shredded paper may take place in this area except cardboard. OR If a secured area within the building is required, it meets the following specifications:

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- \* There must be enough space within this area to stage all materials to be destroyed.
- \* The wall or fence securing this area must be a minimum of six feet tall and have a lockable gate or door.
- \* If the wall or fence does not go all the way to the ceiling, then it must have a ceiling mounted sensor alarm inside and over the perimeter of the secure destruction area (or similar, suitable device) to detect if and when individuals have climbed over or come through a section of the secured area fence/wall.
- Management will complete an Operational Security Maintenance Log to check, record and maintain the facility's operational security functions, including CCTV, Alarms, Lighting and Visitor Logs on a monthly basis. New York Shredding will maintain the Operational Security Maintenance Logs for a minimum of one year.

## 1.3 Handling Incidents of Unauthorized Access

Every employee at New York Shredding should be on guard for unauthorized access to the facility. Any employee noticing a visitor who is not being escorted by an appropriate agent of New York Shredding should immediately contact Management. The unauthorized visitor should then be escorted to the main reception area to have them sign in and be properly escorted in the facility. At the slightest resistance to cooperation, notify the police immediately. Do not physically restrain the individual in any case. If they leave in a vehicle and the license of that vehicle is discernible, it should be noted for further investigation.

## 1.4 Reporting Breaches in Security & Safety

All employees at New York Shredding are to notify the Management of any breach in the security or safety policies of New York Shredding, regardless of its source. Any employee found to have knowledge of a breach in safety or security as stated in New York Shredding's policy manual that does not report it may be dismissed. This would also include reading confidential material entrusted to New York Shredding.

## 1.5 The "Nothing Leaves" Policy

As a security measure, employees at New York Shredding may take nothing into or out of the destruction area without the permission of Management. As a rule, these materials should be left in the employee's locker. Any employee found taking materials into or out of the destruction area without the knowledge and permission of Management may be terminated without any previous disciplinary action having been taken.

## 1.6 Daily Facility Preparations/Inspections

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The daily operations of New York Shredding are the backbone of our success. The following operations procedures are in place at New York Shredding to ensure that our success continues:

- Management will complete a visual inspection of the facility at the beginning and end of each shift.
- Management will look for breaches in security, make sure that the floor is completely clean of paper debris and that all conveyors, balers, shredders and other equipment are in proper working order. In the event of any equipment not being operational, Management will be responsible for arranging all necessary repairs as warranted.
- Management will inspect all collection containers used by New York Shredding to transport between client, vehicles and facility to make sure the equipment protects confidential materials from loss due to wind or other atmospheric conditions.
- Management is responsible for making sure that all Drivers and Helpers are within the dress code policy and that Identification Badges are utilized.
- Management will inspect the forklifts, checking battery and/or fluid levels. All electrically operated forklifts should be charged during the night, as well as the propane supply for fueled units.
- Management will inspect New York Shredding's vehicles to ensure roadworthiness and verify that all proper paperwork for the vehicle's most recent inspection comply with the time frames stated in the applicable state law regarding the nature and frequency of inspections.
- Management will inspect New York Shredding's vehicles to verify that all cab doors and truck boxes are lockable and that locks work properly.
- Management will assist the Drivers in their preparations for the day. Management can use any or all employees to expedite the departure of the Drivers on a timely basis.

## 1.7 Receiving Destruction Materials

New York Shredding's business is media destruction. The following standards are in place to ensure that New York Shredding's facility and employee's provide secured destruction for their clients at all times.

- All materials to be destroyed are always attended by an Access employee or physically secured from unauthorized access while in the custody of New York Shredding before they are destroyed. Securing New York Shredding's vehicle cabs and boxes during transport is also required.
- Management controls the receipt, inspection, weighing, and staging of all materials delivered to the destruction facility.
- All materials are to be weighed/checked in immediately upon delivery to the destruction facility. The material will be unloaded from the truck and separated by client. The containers will be weighed/received and that weight will be submitted to Management. Management will confirm the weight and transfer it onto the client's Receiving Ticket.

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The receiving ticket should be completed upon receipt of the materials, documenting the name of the client, date, weight of the material, and the driver. Management should also note if the materials are to be staged for other than the standard destruction process or to be destroyed with no sorting. In the event that materials are delivered to the destruction facility during non-operational hours, Management should weigh the materials as soon as possible. Materials should be clearly labeled by the Driver who left them. The associated receiving ticket should be left in the designated location.

- All materials from routine, regular service will enter the destruction process immediately upon arrival at the destruction facility. Incoming service bins will be emptied and rotated among those regularly serviced customers. Exceptions would include acts of God, breakdowns, or client instructions to retain the media for a longer period. The Access employees that are responsible for sorting incoming materials will stage materials in the designated area by the order in which they arrived at the facility.
- At time of media pick-up, customer must be provided with a receipt or certificate of destruction indicating type and quantity of media being collected and the destruction services being provided for the media/materials collected. This must include the type of service operations (Mobile or Plant-based) and destruction (paper shredding, micro media or computer hard drive) being provided to the customer.
- Since customers of NAID Certified companies assume that all services provided to them are Certified, New York Shredding must have written notification to the customer when any destruction services rendered are not NAID Certified. This notification should be contained on a materials receipt, certificate of destruction or another written agreement between the service provider and customer.

## 1.8 Staging Destruction Materials

After materials have been received at New York Shredding, proper care should be taken by Access employees in preparing for the physical destruction of the materials. The following steps should be utilized.

- Sorting is to be performed according to the material type designations posted at the sorting station(s). When the materials have been completely sorted, they should be moved to the designated secure holding area.
- Non-information bearing material (unmarked binders, plastic file inserts, among other things) should be placed into the designated bin for storage until Management approves their disposal. If confidential materials are found in the non-information bearing trash, they should be immediately removed and placed in the proper pre-destruction area.

## 1.9 Destroying of Materials

Efficiency and care should be used once materials are ready for destruction at New York Shredding. All destruction of confidential materials received at New York Shredding will take

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place within 3 business days of receipt. Exceptions to this would have to be made between Management and the client through a written agreement. Guidelines for proper destruction of each specific material are as followed:

- Paper materials should be destroyed by shredding and baled by grade if possible. The specifications for particle sizes should be no larger than those listed below:
  - \* Continuous Shred: 5/8 inch Width (max) & Nominal Length
  - \* Cross Cut or Pierce & Tear: 3/4 inch Width (max) & 2.5 inches Length (max)
  - \* Pulverized (Equipment w/ Screens): 2 inch diameter (max) Screen holes If adjustable screens are used, Management will be responsible for ensuring that a Screen Changing Log is kept on or near each machine. The log will record the starting point of the log and the pertinent information regarding any screen changes thereafter. New York Shredding will maintain the Screen Changing Logs for a minimum of one year.
- Microfiche or Microfilm can be destroyed by either a disintegrator or by equipment/process which produces a particle size of 1/8 inch maximum dimension or less. Destroyed materials should be properly discarded.
- Computer Hard Drives or CPUs will be recorded by serial numbers and then physically destroyed according to the separate written method provided by management.
- Management will decide the appropriate method to use to destroy atypical media or non-media materials that require destruction.
- On a daily basis, Management will inspect the destroyed materials prior to disposal, to ensure that the destroyed information is within New York Shredding's standards for the specific media type.

## 1.10 Witnessed Destruction Process

Occasionally a client will need to witness the destruction of materials at New York Shredding. Management has the authority to agree to an appointment for witnessed destruction. New York Shredding will do its utmost to accommodate the client's needs in scheduling the appointment. Management is responsible for handling all witnessed destruction projects. Materials will be delivered to the facility either by a Driver or by the client. If delivered by the Driver, the materials should be securely stored until the client's representative arrives. The witness must sign the visitor's log and be escorted by an Access employee to the Witnessing Area to watch the destruction process. The process should be conducted as close to the time of the client's arrival as possible.

## 1.11 Post Destruction Process

Once materials have been properly destroyed, Management will review that all procedures have been followed and that the job has been completed. Management will use the following procedures:

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- Management will record the date the materials are destroyed, whether in a batch or singularly, on the receiving ticket.
- Management will inspect containers, boxes or security receptacles to verify they are free of the materials to be destroyed. If confidential materials are found, Management will remove the materials and immediately destroy them. Receptacles or boxes to be returned to clients will be returned on the next scheduled pick-up. The emptied and inspected boxes that are not to be returned to the client will be processed into bales. Security containers owned by New York Shredding that are used by the clients will be rotated through a service plan agreed upon by the client and New York Shredding. Any unused security receptacles will be stored in the holding area.
- Management will instruct individuals to stack the bales of destroyed media in rows designated by grade and in rows in the inventory storage area. No weak or mushy bales should be stacked. Weak or mushy bales must be reprocessed.
- Management will weigh bales and record the weight on appropriate documents before they are shipped to a disposal agent. New York Shredding's policy is to have destroyed materials be disposed of in a responsible manner which does not include any type of reuse (for purposes such as animal bedding or packing materials.)
- Management will oversee all bales and upon achieving threshold inventory levels, will determine the destination of all baled materials and schedule all shipments.
- Management will record the tallied total weight of the shipment on the Bill of Lading. Management will be responsible for completing the Bill of Lading compiled from the shipping information and the tallied bale weights.

## 1.12 Closing Procedures

The destruction process is not complete at New York Shredding until these final steps have been done.

- At the end of a shift, an Access employee/individual(s) should sweep the entire exposed floor and pass the sweepings through the destruction process.
- Management will check waste receptacles and areas directly outside of the information destruction building/area to see that no non-shredded, confidential information has been deposited in waste receptacles or that no loose information-bearing materials are scattered around or near the destruction building.
- Management is responsible for relieving employees of duty at the end of each shift. At this time, employee identification badges should be returned and any company-related items.
- Once all employees have been relieved from a shift, Management is responsible for touring the facility and completing a visual security check.
- Management will ensure that all processed receiving tickets are placed in the appropriate holding box located in the business office.

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## 2 DRIVER PROCEDURES

### 2.1 Access to Vehicles

New York Shredding wants to ensure that the utmost security precautions are taken by all employees. New York Shredding's access rules and regulations are as follows for those employees whose job duties involve driving:

- Only Management and designated employee Drivers will be allowed to have keys to vehicles.
- Two sets of keys will be issued to each driver.
- Employees are not allowed to utilize New York Shredding's vehicles for personal use without prior authorization from Management.
- Drivers are to follow the management-designated routes in providing services.

### 2.2 Security and Safety Measures for Vehicle Usage

In addition to the access limitations, New York Shredding utilizes the following security and safety measures for all drivers:

- Driver's Manual will be kept in every vehicle for reference purposes.
- Each driver has been provided with a readily accessible two-way communication device. The device should be kept on at all times unless it is prohibited while inside a customer's facility.
- All doors to the vehicles should be locked unless in use and attended.
- All drivers should exercise extreme caution in all phases of vehicle operation. At no time should any employee put themselves or others at risk for accessing a loading area or loading materials.
- The use of cameras in or around vehicles where confidential materials are located is prohibited without prior authorization from Management.
- Employees are forbidden from possessing firearms while using New York Shredding's vehicles. Any employee found violating this policy may be dismissed.
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### 2.3 No Unauthorized Access to Truck

Under no circumstances are there to be any unauthorized persons permitted to have access to the cab, body, box, payload or tail-lift of the truck. Similarly, no unauthorized person shall be transported as a passenger in the truck at any time. Only Management can authorize access to the truck or permission to provide transportation to any Non Access employee or visitor.

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## 2.4 Driver Demeanor

New York Shredding's drive to provide professional and prompt service requires that all company employees, particularly drivers, be polite and conduct themselves without excessive interaction with the client's personnel. The goal is to provide superior service with a minimum of distraction to their production.

## 2.5 Vehicle Preparation

Prior to driving to a client's location, all drivers must ensure that they are properly prepared for travel. Drivers must do the following prior to departure:

- Drivers must be certain that all vehicle paperwork required by the state is in the vehicle and up-to-date. This also includes any driver's license required.
- Drivers must make sure the truck is loaded with any security containers, carts, or pallets that are required to execute the assigned work orders.
- The driver should have a Receiving Ticket for each customer. The driver is also responsible to make sure there is a sufficient supply of New York Shredding's business cards in the truck.
- Drivers must make certain that the truck has adequate fuel to complete the route. There is no excuse for running out of fuel. Such incidents will be noted and considered in employee evaluations.
- If a vehicle is in need of repair, the driver should complete a Maintenance Request form and notify Management.

## 2.6 Driver Authority

Unless it is stipulated otherwise, while completing assignments the driver is New York Shredding's sanctioned authority and is responsible for instructing any other assistants in order to execute their assignments and duties safely, securely and as efficiently as possible. The driver is the lead representative and in charge of all client communications and interactions, unless a higher company authority is present.

In the event that a destruction facility is unattended when a driver arrives or departs, the driver will be responsible for its security. The driver should relock any doors and set the alarm before they leave the building unattended. If no security procedures have been established with the client prior to arrival, the driver must either contact the client or New York Shredding's management to determine how to handle the situation.

## 2.7 En-route

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The success of New York Shredding's business is dependent upon the knowledge and reliability of its drivers while completing an assignment. Drivers should familiarize themselves with all aspects of New York Shredding's business and the expectations of their drivers. Specifically, drivers should ensure that the following are adhered to while traveling to or from an assignment:

- Follow scheduled and designated routes to, from and between clients.
- It is driver's responsibility to inform Management of all developments that affect the timeliness and efficiency of executing the route. Drivers are required to notify the Management in advance of any period of time that they will be unable to be reached via New York Shredding-issued two-way communications device.
- The driver should always make sure that any confidential materials on the vehicle are secure at all times.
- In the event of a breakdown, the driver should immediately contact Management of New York Shredding and inform them of the situation. The driver or a representative of New York Shredding should then contact any client(s) that will be affected by the delay. Arrangements to service the vehicle should then be made. The driver should stay with the truck until help arrives. The driver should never leave a disabled truck unattended for any reason other than their safety or the safety of others. The driver should keep Management informed of the estimated time required for repairs.
- In the event of a collision or other accident, the driver should contact any emergency authority required first. If able, the driver should then notify Management or a representative of New York Shredding of the situation and if the vehicle will be operational. The driver or a representative of New York Shredding should then contact any client(s) that will be affected by the delay. The driver should also make sure the materials in the truck are secure. If they are not secure, the driver and any assistants should do their best to secure them. Management may need to dispatch help if required to secure the materials. Except for the police, the driver and any assistants should not engage in a dialogue with anyone regarding the accident, unless otherwise directed by Management.
- If a driver arrives at a loading area that is occupied, the driver should assess how long the delay will be. If it will be a long delay (more than 15 minutes) or if the length of the delay is indeterminable, the driver should locate an alternate loading area. If no alternative is available, the driver should notify the client to make alternative arrangements.

## 2.8 While at Client's Facility

Upon arrival at the client's facility, all drivers and any assistants of New York Shredding should remember to be professional and courteous at all times. The following guidelines should also be used:

- There may be instances where a client makes a request outside of the scope of the assignment that will need to be dealt with immediately. If the request is reasonable and

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does not seriously delay the route, then the driver should comply with the request and notify Management of New York Shredding later. (Management will inform the client of the problem with such requests later or assess a charge for the extra service.) If a client makes a request that is unreasonable, delays the route, compromises security, or is otherwise inappropriate, the driver should notify Management of New York Shredding immediately. Once apprised, Management will advise the driver regarding how to proceed.

- While at the client's facility, if a vehicle is required to be left unattended, the cab and box should be locked. No materials in New York Shredding's custody should be left unattended ever.
- If destruction of confidential material is not performed at the client's facility, then the driver should secure all containers before moving them. No person, not even an employee of the client, is allowed to examine or retrieve materials taken into New York Shredding's possession. If a situation requires that a client look through the materials or retrieve something from them, then the driver should contact Management first to get approval.
- If a customer expresses a complaint about a driver or New York Shredding, the driver should offer to convey their dissatisfaction or give them New York Shredding's business card.

## **2.9 Collecting, Receiving and Destroying Confidential Materials for On-site, Mobile Destruction**

New York Shredding adheres to the following general policies in the collection, receipt and destruction of materials for on-site, mobile destruction:

- All materials taken into New York Shredding's custody are to be destroyed before proceeding to the next client, unless otherwise prearranged.
- All materials to be destroyed are always attended by an Access employee/individual or physically secured from unauthorized access while in the custody of New York Shredding before they are destroyed. Securing New York Shredding's vehicle cabs and boxes during transport is also required.
- If vehicle is left running and unattended while collecting media at the client site, driver should use duplicate keys to lock the vehicle cab and box.
- At time of media pick-up, customer must be provided with a receipt or certificate of destruction.

The driver should use the following steps in receiving/collecting and transporting confidential materials for destruction:

- At time of media pick-up, customer must be provided with a receipt indicating type and quantity of media (paper, micro media, computer hard drives, etc.) being collected and

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that mobile destruction services are being provided for the media/materials collected and whether or not such services are NAID Certified. Management will instruct driver as to proper recording of this information on the receipt.

- The driver should complete the Receiving Ticket, have it signed by the client's representative, and leave the receipt with the client. The driver must return the work order to Management.

New York Shredding's destruction process procedures are as follows:

- Paper materials should be destroyed by shredding and baled by grade if possible. The specifications for particle sizes should be no larger than those listed below:
  - \* Continuous Shred: 5/8 inch Width (max) & Indefinite Length
  - \* Cross Cut or Pierce & Tear: 3/4 inch Width (max) & 2.5 inches Length (max)
  - \* Pulverized (Equipment w/ Screens): 2-inch diameter Screen Size holes (max)  
If adjustable screens are used, Management will be responsible for ensuring that a Screen Changing Log be kept on the truck denoting the starting point of the log and the pertinent information regarding any screen changes. New York Shredding will maintain the Screen Changing Logs for a minimum of one year.
- Microfiche or Microfilm can be destroyed by either a disintegrator or by equipment/process which produces a particle size of 1/8 inch maximum dimension or less. Destroyed materials should be properly discarded.
- Computer Hard Drives or CPUs will be recorded by serial numbers and then physically destroyed according to the separate written method provided by management.
- Management will decide the appropriate method to use to destroy atypical media or non-media materials that require destruction.
- On a daily basis, Management will inspect the destroyed materials prior to disposal, to ensure that the destroyed information is within New York Shredding's standards for the specific media type.
- Paperwork verifying destruction should be returned and signed by an authorized agent of the client, preferably the person that witnessed the destruction process.
- Prior to leaving a client's facility, the driver should ensure that no confidential materials or trash are left on the ground where the loading or destruction took place.
- When leaving equipment at a client's facility, the driver should make sure it is in reasonable condition considering the environment in which it is located. Containers that are to be left in an office area require a much better appearance than those to be left in a warehouse. The driver should never leave equipment that does not function properly.

## 2.10 Collecting and Receiving Confidential Materials for Plant-based Destruction

- All materials to be destroyed are always attended by an Access employee/individual or physically secured from unauthorized access while in the custody of New York

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Shredding before they are destroyed. Securing New York Shredding's vehicle cabs and boxes during transport is also required.

- At time of media pick-up, customer must be provided with a receipt indicating type (paper, micro media, computer hard drives, etc.) and quantity of media being collected and that Plant-based destruction services are being provided and whether or not such services are NAID Certified. Management will instruct driver as to proper recording of this information on the receipt.

## 2.11 Reporting Damage to a Client's Facility

New York Shredding takes pride in providing quick and honest employees. In the event that any accidental damages occur during an assignment, the driver must notify the client immediately about any damages to their property. The client should be assured that New York Shredding takes responsibility for actions that caused the damages and will pay for any damages resulting from those actions. The driver or assistant should notify Management at New York Shredding of such an occurrence as soon as possible. Management will be responsible for inspecting the damage and reconciling the issue with the client.

## 2.12 Ending the Destruction Assignment

Upon completion of an assignment, the driver and any assistants will unload all materials at the designated secure location. Each client's material should be individually staged and weighed. The driver will inspect and accept the materials, as they are unloaded from the truck. The driver will turn the Receiving Ticket over to Management upon verification that all materials have been removed from the vehicle.

Management is responsible for materials once they are unloaded at the designated secure location. Management will weigh bales and record the weight on appropriate documents before they are shipped to a disposal agent. The driver and any assistants will return their ID Badge to Management or the designated location in the office upon completion of the shift.

## 2 COMPANY PROCEDURES

### 2.1 OPERATIONAL SECURITY

MANAGEMENT WILL NOTIFY ANY CUSTOMER OF A POTENTIAL RELEASE OF, OR UNAUTHORIZED ACCESS TO, THAT CUSTOMERS CONFIDENTIAL CUSTOMER MEDIA

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THAT POSES A THREAT TO THE SECURITY OR CONFIDENTIALITY OF THAT INFORMATION AS SOON AS REASONABLY POSSIBLE.

I have received the operational policies and procedures manual and understand that I must read and understand the information provided.

Date \_\_\_\_\_

Employee Name (Printed) \_\_\_\_\_

Employee Signature \_\_\_\_\_