



Office of the Common Council - City Clerk
City Records Center

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Confidential Records Disposal Policy

Issued: November 19, 2009; Updated: March 2, 2018; Updated: June 3, 2019

All City Records with an active retention schedule and a disposition of "Destroy Confidential" ("Destroy Under Supervision" in the old system), or that contain other Personally Identifiable Information (PII) such as credit card or Social Security numbers, should be destroyed securely and completely to prevent accidental disclosure to unauthorized parties. The City Records Center has executed a contract for disposal of confidential records with Kard Recycling & Shredding, effective Monday November 11th, 2013. As required by Wisconsin State statutes, all records must be formally scheduled on Departmental Record Retention Schedules for destruction prior to disposal.

As part of the Citywide Records Management Program, the City Records Center will coordinate arrangements for confidential shredding services in an effort to maximize efficiencies, realize potential fiscal savings and monitor compliance with local, state and federal records laws governing the destruction of records. The cost of shredding for Non-Enterprise Fund departments is included in the budget of CCCC/MRC. Enterprise Fund departments will be billed on a biannual basis through City Records. City departments located within the City Hall Complex, as well as outlying City Buildings, with the exception of Milwaukee Police Department locations and the Municipal Court should make arrangements for disposal of records with Jack Gaboury, Document Services Supervisor, 286-3393, or Brad Houston, Document Services Manager, 286-5478. Shredding arrangements and invoicing for MPD and Municipal Court will be administered by MPD contacts.

Please re-read this policy carefully, as additional requirements for departments to prepare their documents for shredding are outlined. **The City Records Center reserves the right to refuse records for destruction that do not meet these requirements, or to bill the creating departments for any extra fees incurred by records contamination.**

City Hall Complex Departments

- The City Records Center will provide locked barrels to departments requesting containers for the purpose of confidential records disposal. Only one key is issued to the City Records Center for all containers.
- Unlocked barrels will only be provided for immediate high-volume disposal in City Hall Complex areas with same-day/next-day return to City Records Center storage facilities. Departments take full responsibility for maintaining the security of the barrel within their departments and must lock barrels upon filling. **Under no circumstances should barrels be opened for non-requesting departments once they have been delivered.**
- Locked barrels will only be opened in offices by City Records staff on **specific, written request of the unit manager or their immediate superior**. Departments requiring additional high-volume records destruction capacity must request a new barrel
- Departments will be asked to sign for receipt of the barrels in their office areas, and provide other contact information. Barrel numbers issued to departments will be documented, as well as the date received and returned to the City Records Center.
- Initial arrangements to establish routine requests for disposal barrels within city departments should be made through department records coordinators in conjunction with the City Records Center.

City Offices and Buildings Outlying the City Hall Complex

- Department head-appointed records coordinators representing city departments must coordinate arrangements for the delivery and pickup of confidential disposal barrels through the City Records Center. In addition to the records coordinator, a member of staff on-site at each pickup location must be designated for communication to schedule special pickups, answer questions re: disposal issues, etc.
- Records coordinators will be asked to provide the City Records Center with barrel/container numbers upon receipt of barrels from Kard Recycling and Shredding and coordinate arrangements for the pickup of barrels through Jack Gaboury, 286-3393, or Brad Houston, 286-5478.

All Departments

- Records Coordinators for each city department should ensure that all records placed in shredding barrels are authorized for destruction with valid record retention schedules, also known as, record destruction authorization forms. Non-record materials, such

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as expired permit stickers; blank, unusable checks and forms; and working papers containing personally identifiable and/or sensitive information are also acceptable items for deposit in disposal barrels.

- Departments may bring records directly to the City Records Center for cases in which a more precise date of destruction is desirable. Records brought for destruction in this manner must be in Records Center cartons (or equivalent boxes of similar size) accompanied by a Records Transfer List, which must document the Record Retention Schedule Number (YY-XXXX), the number of boxes, and the type of record/records within each box. Non-record materials may also be accepted directly at the records center, subject to prior approval of the Document Services Manager.
- All records to be destroyed, via barrel or via direct delivery to City Records, should be free of non-paper items, including audio/visual media and equipment, digital media, microfiche or other film, three-ring binders, and organic material or waste (including dirt, mold, and other potential biohazards). Staples, paperclips, and similar fasteners may be left attached, but inclusion of other media in boxes or departmental barrels may contaminate the barrel and result in extra processing charges.
- If records require additional levels of security (e.g. records subject to HIPAA regulations), departments should indicate the extra security needed to the document technician so that City Records can appropriately manage the affected barrel(s) until they are retrieved by our shredding vendor for destruction.
- Non-paper media can be destroyed confidentially, but should be separated from paper records as described above and placed into a special "Media only" barrel. Departments should contact City Records to have non-paper media collected as needed.

Any questions or concerns regarding this policy should be directed to Brad Houston, Document Services Manager, Municipal Research Center/City Records, recmgr@milwaukee.gov .