

DISPOSAL POLICY

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SLT Responsible	Business Manager
Signature of Chair	
Signature of Headteacher	

Disposal, Reuse and Recycling of ICT Equipment

The school holds and processes a large amount of information and is required to protect that information in line with relevant legislation and in conformity with school regulations and policies. This policy document provides guidance on school policy relating to the disposal, reuse and recycling of ICT equipment and supplements the GDPR Policy and Data Security Policy. It ensures that the school;

- Complies with obligations under European & UK Environmental Legislation
- Fulfils its commitment to the Waste Reduction Policy 2005 and Sustainability Policy 2000
- Meets software license obligations
- Reduces risk of sensitive data being released to unauthorised persons

The school and its employees have a responsibility under several EU Directives, including the General Data Protection Regulation 2018, Landfill Directive, the Waste Electronic & Electrical Equipment Directive (WEEE) and the Hazardous Waste Directive, to ensure that final disposal of all Waste Electronic and Electrical Equipment is responsible and traceable. In order to meet this obligation, it is the responsibility of the school to follow the procedures outlined in this document both when initially purchasing electronic equipment and when disposing of such items.

Register of ICT Equipment

Due to compliance risks associated with inappropriate disposal of electronic equipment, the IT Team records items such as desktop PCs, laptops, etc. with data holding capacity in the ICT Hardware Inventory and subsequently in the Disposals inventory at the point disposal has been agreed. This is to record ownership, and any transfer thereof, of equipment in order to assist with the traceability of the equipment through the stages of its lifetime and final disposal.

It is the responsibility of the IT Team to maintain the ICT Hardware Inventory and the Disposals inventory.

It is the responsibility of departments to ensure their office and room inventories contain any items not on these inventories e.g. digital or non-digital cameras, calculators, etc., items purchased from departmental budget.

Where the disposal involves the disposal of IT equipment, the IT Team shall keep a record of the asset and serial number of the equipment which has been disposed of along with a record of the process by which the information stored on the equipment has been irretrievably destroyed.

Reuse of Surplus Equipment within the School

- All unwanted ICT equipment must be returned to ICT
- If unwanted ICT equipment is still useable, the IT Team follows a general policy of internal cascading of surplus equipment within the school/authority. If no use can be found within the school for unwanted equipment or it is no longer functioning then ICT may use the equipment for parts

Disposal for Recycling

ICT equipment MUST never be disposed of through other General Waste routes. It is illegal to mix computer waste with General Waste or to landfill untreated computer waste.

- School ICT equipment must also NEVER be sold to staff or any other individual or organisation as this puts the authority in a position as a producer of WEEE
- ICT equipment will not be donated to charities, etc. unless the disposal company takes on full responsibility for disposal of the equipment, as this puts the responsibility onto the school of ensuring the equipment is kept track of and returned to the school for disposal, as it is still classed as being owned by the school
- If no use can be found within the school for unwanted equipment, it must be disposed of as per the following points
- The items disposed of must be moved from the ICT Hardware Inventory to the Disposals inventory with the details of disposal method, date of disposal and authoriser
- All IT equipment awaiting disposal must be stored and handled securely
- Hard drives must have all software and data removed in accordance with the appropriate industry standard or must be destroyed
- Equipment purchased before 31st March 2005 will be collected by a fully authorised WEEE collection contractor. Any cost incurred, will be charged to departments
- Equipment purchased after 31st March 2005 will be collected by the supplier free of charge where possible, otherwise departments will be charged for this service

Data Held on ICT Equipment, Including Personal Equipment

- It is the school's policy to ensure all information held by the School is disposed of appropriately, in conformity with the school's legal obligations
- It is the responsibility of all school staff to ensure the information held by the school is disposed of appropriately and that all sensitive information is disposed of securely
- Staff holding school data on IT equipment should routinely dispose of the data when it is no longer required to be held for legal or contractual purposes or is no longer necessary for the business purpose for which it was originally created or held
- Where a decision has been made that data held on IT devices or media should not be retained, the files containing the data should be deleted from those devices. Deletion involves putting the information "beyond use" by the user of the device or media. Data held in a "recycling bin" on the device or data which can easily be recovered by the user are not regarded as being "beyond use" and may still be subject to discovery and disclosure under information law (Freedom of Information, Subject Access Request) or litigation
- Electronic or digital data which have been put "beyond use" by users may still be reconstituted. This means that when IT equipment (devices or media) are disposed of, the data should be:
 - Irretrievably destroyed by being overwritten in accordance with the appropriate industry standard or physically destroyed
 - The hard disc containing the data within the equipment or the media containing the data (e.g. CD, USB stick) should be physically destroyed, this should be supervised by the IT Team

- Any school or personal device that holds data that is lost or stolen must be reported immediately to the Data Protection Officer DPO@fearnhill.herts.sch.uk, your line manager and the IT Team

Hard and Paper Copies

- Any third party contracted to dispose of sensitive hard copy information shall certify the irretrievable destruction of the information
- Staff holding school data in hard copy should routinely dispose of the data when it is no longer required to be held for legal or contractual purposes or is no longer necessary for the business purpose for which it was originally created or held. Further information can be obtained from the Business Manager
- It is good practice to shred, pulp or incinerate all school data which requires destruction. Where hard copy waste is sensitive data, it should always be securely and irretrievably destroyed by shredding, pulping or incineration. In order to ensure the secure and irretrievable destruction of hard copy, staff are required to use the service provided by the selected contractor for the destruction of confidential waste
- Secure shredding containers are located around the school site for disposal of sensitive, confidential paper copies. Other media should be brought to the ICT office for disposal
- Where sensitive data is stored under contract externally, staff responsible for the contract should ensure the contract includes secure, certificated destruction of the data in accordance with the appropriate retention period. External storage and destruction of school data should not be arranged without reference to the Business Manager