South East London Integrated Care System

NHS South East London

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NHS South East London Integrated Care Board

# ICT Equipment disposal policy

# (Ref IT09)

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| **Approved by** | |
| **Date approved** | |
| **Name and title of originator/author** | Alison Pryor, Business support and compliance Manager |
| **Name and title of sponsor** | Pin Bhandal – Assistant Director of IT, SEL ICB |
| **Review date** | May 2026 |
| **Description** | This procedure document has been developed to reflect the legal requirements, responsibilities, and accountabilities with regards to disposal of ICT Equipment. |
| **Target audience** | All NHS SEL ICB Staff |

Version Control

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|---|---|
| **Version number** | V1.0 when approved |
| **Supersedes** | **ICT Equipment Disposal Policy CCG version** |

Document Review Control Information

| **Version** | **Date** | **Reviewer Name(s) and Job title** | **Change/amendment** |
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| V0.1 | Jan 2023 | Jill Turner | Policy written onto new ICB template |
| V0.2 | March 2023 | Alison Pryor | Reviewed for SEL ICB |
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# ICT equipment disposal policy

## 1. Introduction

This document outlines the steps that NHS South East London Integrated Care Board (SEL ICB) Information, Communication and Technology (ICT) department takes to ensure that all electrical equipment and computer media is disposed of in a safe, secure, and ethical manner adhering to government Waste Electrical and Electronic Equipment (WEEE) legislation and regulations.

SEL ICB have a legal duty to protect data, including personal identifiable data, which includes data which may be stored on hardware equipment and media which is due for disposal. This policy aims to ensure that SEL ICB minimise the risk of any data breach as a result of ICT equipment being disposed of incorrectly.

Equipment and media can include, but is not limited to:-

**Hardware**

By its own nature ICT equipment is constantly evolving and this can therefore become a very broad category making it impossible to list every single item or group of items within this document; however physical assets can be summarised as follows:

- Personal Computer (PC) or workstation
- Laptop or Notebook computer
- Local or Networked data server
- Backup devices and tapes
- Local or network printer
- Local or Network Scanner
- USB removable device or portable hard disk
- Still or video camera (used for work purposes)
- Mobile phone or Smart phone
- iPads, tablets or any other mobile device
- network device (such as a switch, router or firewall)

**Software**

Software is defined at the applications and operating systems used by a computer of device. Samples of software can be summarised as follows:

- Desktop software – all applications and related data loaded onto a Desktop or Laptop computer.
- Server software – all applications and related data loaded onto a local or networked server.
- Hosted solution – all applications and related data (owned/managed by NHS SEL ICB) hosted off site.

- Cloud solution – all applications and related data (owned/managed by SEL ICB) hosted in Cloud storage.

## 2. Scope and Definitions

This document is for the purpose of all SEL ICB ICT equipment and includes equipment procured and supplied within South East London GP Practices. (Bexley, Greenwich, Lambeth, Lewisham, and Southwark). It also applies for external organisations where ICT service provisions are met by SEL ICB ICT under contract or service level arrangement.

This document applies to all authorised users of NHS SEL ICB ICT assets/ICT media and is therefore applicable to all staff, whether permanent or temporary, and to contractors or partners who have access to SEL ICB information, ICT assets, ICT media and premises or remote working locations where ICB ICT assets or ICT media are located.

### 2.1 Out of Scope

Bromley Primary Care ICT equipment is out of scope and the disposal is managed by the IT Provider within Bromley Health Care. It is therefore the responsibility of Bromley Health Care IT services to ensure the disposal is carried out under the WEEE legal obligations.

### 2.2 Definitions

Definitions can be found in appendix A

## 3. Roles and responsibilities

### 3.1 Chief of Staff

The Chief of Staff (CoS) has overall responsibility for SEL ICB information, Technology and ICT security and is the designated Senior Information Risk Owner (SIRO) for SEL ICB. The CoS holds ultimate responsibility of the ICT and Information governance directorate.

### 3.2 Director of ICT and IG

Delegated responsibility for information technology and ICT security is then given to the Director of ICT and IG as the responsible offer for SEL ICT services and the designated deputy Senior Information Risk Owner.

The Director of ICT and IG is responsible for the leadership of strategic and day to day management of the directorate ensuring that SEL ICB have the staff resources,

technology and equipment for the organisation and staff to carry out its business activities legally and securely.

### 3.3 Associate Director of ICT

The responsibility for the provision of ICT equipment, security and disposal of ICT equipment and media is held by the Associate Director of IT, who with members of the SEL ICT team carry out the necessary process to ensure the organisation ICT equipment and assets are done so securely and in line with the legal duties under the WEEE directive and Data Protection Act 2018.

### 3.4 SEL ICT (ICT security and system specialists)

SEL ICT staff are responsible for supporting staff with the necessary appraisal and disposal of ICT equipment and media.

SEL ICT provide service desk support to assist staff with any ICT enquires. These roles must ensure that that the confidentiality, integrity and availability of the organisation information and IT systems it met and will have the knowledge and skills carry out their role.

### 3.5 All employees

All staff, including, permanent, contractors, fixed term, volunteers and any other associated persons allocated with SEL ICB ICT equipment, and any associated home working equipment are responsible for ensuring any damage or end of life equipment and media is correctly disposed of and adhere to this policy and other related procedures regarding ICT equipment. All staff must advise SELICT ICT@selondonics.nhs.uk and arrange for the return of any devices to the department for disposal.

SEL ICB will provide ICT, data security and confidentiality guidance in line with employee's contractual obligations and staff will receive instructions and direction from various resources:

- Policy/strategy and procedure manuals.
- Line managers.
- Specific training courses.
- Other communication methods (including team meetings and bulletins);
- Information via SEL ICB intranet.

Staff must take responsibility for the care and cleanliness of the ICT equipment provided to them and adhere to the *ICT equipment and acceptable use policy.*

### 3.6 Other third-party organisations

Where SEL ICB provide ICT service provisions and ICT equipment; either through a Service Level Agreement or contract, these organisations must ensure the appropriate action is taken to notify and return any equipment which is broken or end of life for disposal.

## 4. Process

The SEL ICB policy for the disposal of ICT equipment will ensure the following target audience is covered.

- All SEL ICB devices and equipment
- All General Practice (GP) devices and equipment which has been supplied by the SEL ICB ICT
- All Third-party devices and equipment (where equipment disposal is part of a Service Level Agreement or contract)

Any ICT equipment that requires disposal must be notified to SEL ICT via the Service Desk email ICT@selondonics.nhs.uk or Halo portal. SEL ICT will liaise with the requester to discuss the disposal requirements and return of the equipment.

ICT service engineers may also invoke the process for the disposal of a piece of ICT equipment.

### 4.1 Viability assessment

The need to condemn a piece of equipment may not always be decided instantly and SEL ICB ICT will carry out a diagnose and assess whether the ICT equipment is redundant for its original use and to be disposed.

SEL ICB ICT will consider whether the likely cost of repair is justifiable, and a decision may be made to carry out the repair and return the equipment back into circulation for reuse.

In all instances an assessment must be undertaken to determine the validity of disposal of the equipment and to ensure authorisation is granted for the removal of the equipment from the NHS SEL ICB ICT asset register.

Regardless of the path taken to assess the usefulness of equipment; there are only three reasons for disposing of it. The equipment to be disposed could be classified under one of the following categories.

| | | |
|---|---|---|
| **1.** | **Redundant (Fully functioning/ not functioning)** | This is equipment that is no longer fit for purpose and is incapable of running the standard software deployed at the time. Redundant equipment that is not working will automatically qualify to be disposed. i.e. Equipment running to slow or not capable of running the latest software. |
| **2.** | **Broken equipment** | Broken equipment that cannot be repaired will automatically qualify to be disposed. It is also possible that broken equipment that can be repaired will qualify to be disposed when the cost of repair is greater than, equal to or just less than the cost of replacement. |
| **3.** | **End of life** | This is equipment which may be functioning correctly but has reached its end of life and is no longer supported by the manufacturer. Such equipment may no longer receive security updates and therefore pose a risk to the IT operations of the ICB. |

## 5. Reuse and disposal

### 5.1 Secure disposal or re-use of equipment and storage media

SEL ICT will ensure arrangements are made for the secure destruction/recycling of any ICT equipment, hard disks, tapes, and any related data.

SEL ICT will procure disposal services from third party suppliers which are Waste electronic Environment European Commission (WEEE) certified to carry out the disposal, recycling or destruction of ICT equipment in line with the relevant regulations.

When procuring any new organisation for the disposal purposes, SEL ICB will carry out a Data Protection Impact Assessment to ensure the appropriate accreditation and legal processing of the data and disposal of equipment is compliant. The company that is procured will arrange to wipe any data so that it is unrecoverable and provide certificates of waste transfer collections.

ICT equipment which is damaged or no longer required must be returned to SEL ICT to be repaired or destroyed and the ICT asset register will be updated accordingly.

Under no circumstances can any ICT equipment be directly sold to any individual or other organisation.

No computer equipment should be disposed of via undesignated skips, dumps, and landfill or sold on various sites such as eBay, etc.

### 5.2 Redundant equipment

SEL ICB do not have the appropriate facilities and resources to reissue redundant or surplus ICT equipment. This will be done so in line with a contracted and approved WEEE ICT disposal company, who will determine the destruction or recycling of equipment on a case-by-case basis.

In all cases data destruction is carried out using the latest National Cyber Security Centre overwriting software or the contracted waste disposal company will shred the hard drives.

## 6. Incident management

All incidents which constitute a threat to SEL ICB ICT business and personal data will be investigated and reported. This includes, but not limited to:

- The disclosure of personal or confidential information to an unauthorised individual or system.
- The integrity of the data or the system being put at risk.
- The availability of the data or the system being put at risk.
- An adverse impact, such as a cyber security attack.
- Loss or theft (including damage) of a device or ICT equipment.

Where an incident or suspected incident (near miss) has occurred staff must ensure that it is reported and registered in line with the SEL ICB *Incident management policy*. A form to report the incident is available on the intranet (*Home>Information Governance>Data breach and incident reporting)*

Failure to report an incident or near miss may result in possible investigations and fines from the Information Commissioners Office (ICO) and may lead to subsequent disciplinary action if any misconduct or unauthorised access has occurred.

## 7. Review of policy

The ICT Equipment Disposal Policy will be reviewed every 2 years, or sooner if there are any changes in guidance or the disposal process which may affect the policy.

SEL ICT will review and oversee the dissemination of this policy following approval by the Director of ICT and IG and ratification by the SEL ICB Finance and planning committee.

Details of the policy will be maintained on the SEL ICB corporate policy register and made available on SEL ICB intranet.

## 8. Reference to other related documents

- SEL ICB, ICT network and security policy
- SEL ICB, ICT equipment and acceptable use policy
- SEL ICB, Information management Policy

Further ICT policies and information governance policies are made available on the SEL ICB intranet.

## 9. Equality and diversity statement

NHS South East London ICB is committed to equality of opportunity for its employees and members and does not unlawfully discriminate based on their “protected characteristics” as defined in the Equality Act 2010 - age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. An Equality Impact Assessment has been completed for this policy.

If members or employees have any concerns or issues with the contents of this policy or have difficulty understanding how this policy relates their role, they are advised to contact the Associate Director of Corporate Operations.

| ICT Equipment disposal policy<br>Appendix A – Definitions | |
|---|---|
| **Term** | **Definition** |
| **Authorised staff / authorised user.** | Means any NHS SEL ICB employee, contractor, temporary staff or any other person who has auditable authority from the Chief Officer to access, view and process ICB information. |
| **Confidentiality** | Means the protection of ICB information from any unauthorised form of disclosure or misuse. |
| **Disposal / disposed /dispose.** | Means the secure destruction of ICB information or assets so that it is permanently destroyed and not capable of being retrieved. |
| **Data Protection Impact Assessment** | A Data Protection Impact Assessment (DPIA) is a process designed to identify risks arising out of the processing of personal data and to minimise these risks as far and as early as possible. DPIAs are important tools for negating risk, and for demonstrating compliance with the UK General Data Protection Regulations. |
| **ICT asset** | Means ICB owned IT equipment that is capable of storing, either temporarily or permanently, information including USB memory sticks; Any form of flash memory or removable storage device including removable hard drives |
| **ICT Media** | Includes:<br>CCTV tapes<br>Audio tapes<br>Floppy diskettes<br>DVD's<br>Compact Discs (CD)<br>Back-up tapes<br>SD memory cards<br>USB Drives |
| **WEEE** | Waste from Electrical and Electronic Equipment - The Waste Electric and Electronic Equipment (WEEE) Regulations 2013 ("the Regulations") became law in the UK on the 1st of January 2014 and replaced the 2006 Regulations. WEEE organisations arrange for specialist waste disposal and recycling or electrical equipment – Regulations: Waste Electrical and Electronic Equipment (WEEE) - GOV.UK (www.gov.uk) |

## Appendix B - Equality & Equity Impact Assessment Checklist

This is a checklist to ensure that relevant equality and equity aspects of proposals have been addressed either in the main body of the document or in a separate Equality & Equity Impact Assessment (EEIA)/ Equality Analysis. It is not a substitute for an EEIA which is required unless it can be shown that a proposal has no capacity to influence equality. The checklist is to enable the policy lead and the relevant committee to see whether an EEIA is required and to give assurance that the proposals will be legal, fair and equitable.

The word "proposal" is a generic term for any policy, procedure or strategy that requires assessment.

# Equality Analysis Screening Tool

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|---|---|
| **Date of Assessment** | 06/04/2023 |
| **Assessor Name(s) & Job Title(s)** | Alison Pryor, Business support and compliance manager IT and IG |
| **Organisation** | NHS SEL ICB |
| **Name of the project/decision** | SEL ICB ICT equipment disposal policy |
| **Aim/Purpose of the project/decision** | To provide a full details regarding the process for disposing of ICT equipment. |

1. **Do you consider the project/decision to have an *adverse workforce equality impact and/or health inequality impact* on any of the protected groups as defined by the Equality Act 2010? Write either 'yes' or 'no' next to the appropriate group(s).**

| Protected group | Yes/No | Protected group | Yes/No | Protected group | Yes/No |
|---|---|---|---|---|---|
| Age | No | Pregnancy/Maternity | No | Marriage/Civil Partnership (employment only) | No |
| Disability | No | Race | No | Socio-economic / Deprivation | no |
| Gender | No | Religion/Belief | No | Carers | No |

| | | | | | |
|---|---|---|---|---|---|
| Gender reassignment | No | Sexual orientation | No | | No |

## 2. If you answered 'yes' to any of the above give your reasons why

| |
|---|
| [Please insert comments here] |

## 3. If you answered 'no' to any of the above give your reasons why

| |
|---|
| This policy is not in relation to individuals and therefore does not impact on equality. |

| **4. Please indicate if a Full Equality Analysis is recommended:** | | **NO** | **YES** |
|---|---|---|---|
| Signature of Project Lead: | Date completed<br><br>06/04/2023 | **No** | |
| Signature of reviewing member of Equality Team: | Date reviewed: | **IF YES, BEGIN TO GATHER DATA FOR COMPLETION OF A FULL EQUALITY ANALYSIS** | |