



## BROADFIELD PRIMARY SCHOOL

# Disposals Policy

Issued:	May 2012
Latest Review Date:	Autumn 2014
Due for Review:	In Line with HCC or Autumn 2017
Issue number:	V3.0
Committee:	Resources

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**Signed:**

**Date:**

**Position:**

Disposal Policy – Jonathan Lee  
Issued: Autumn 2014  
Due for Review: Autumn 2017  
Issue Number: 3.0  
Committee: Resources

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## Disposals Policy

This policy aims to ensure that equipment is disposed of in a consistent manner taking into account the school's legal obligations.

The school has an obligation to dispose of data securely and hardware in an ecological fashion. Guidance on how to undertake this complicated procedure is given by County and is included as Appendix 2 below.

### **Disposal by Sale**

The overriding requirement is that the system for disposal must be fair and seen to be fair and that everyone who wishes to buy a piece of equipment has an equal chance of doing so.

Any items that may have a commercial value may be sold in the first instance to an outside interest, (e.g. dealer, shop etc.).

Failing this, items for sale will be displayed on the staff notice board with the minimum amount that would be expected. This estimate will be set by the Head in conjunction with a member of the Governors' Resources Committee. Confidential bids will be invited within one week and the highest bid will be accepted. VAT will be included in the amount.

Items that remain unsold will be advertised in the same way to parents, by posters around school or on the newsletter and the same sale procedure followed.

All income will be paid into the General Account and VAT declared on the income. Disposal should be recorded on a Disposals Form (see below Appendix 1).

Any electrical equipment being considered for disposal by sale/gift will have been subject to a recent electrical safety check and hold a valid PAT certificate. The procedure to ensure personal data is irretrievably removed will be followed.

### **Disposal by Donation**

Items may be donated to other educational establishments that are less fortunate and could genuinely use the equipment. The disposal should be recorded on a Disposals Form (see below Appendix 1). The decision to donate will be made by the Head in conjunction with the Resources Committee.

Any electrical equipment being considered for disposal by sale/gift will have been subject to a recent electrical safety check and hold a valid PAT certificate. The procedure to ensure personal data is irretrievably removed will be followed.

### **Disposal by Scrapping**

When goods are considered to be 'write-offs' this should be recorded on a Disposals Form (see below Appendix 1). Where the value of the item is under £500, the Headteacher will make the decision to scrap the item - above £500, the decision will be referred to the

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All redundant ICT equipment will be disposed of through an authorised agency or via the Hertfordshire Business Services (HBS) disposal scheme. This should include a written receipt for the item including an acceptance of responsibility for the destruction of any personal data.

All redundant ICT equipment that may have held personal data will have the storage media over-written multiple times to ensure the data is irretrievably destroyed. Or if the storage media has failed it will be physically destroyed. BPS will only use authorised companies who will supply a written guarantee that this will happen.

Disposal of any ICT equipment will conform to:

The Waste Electrical and Electronic Equipment Regulations 2006

The Waste Electrical and Electronic Equipment (Amendment) Regulations 2007

<http://www.environment-agency.gov.uk/business/topics/waste/32084.aspx>

[http://www.opsi.gov.uk/si/si2006/uksi\\_20063289\\_en.pdf](http://www.opsi.gov.uk/si/si2006/uksi_20063289_en.pdf)

[http://www.opsi.gov.uk/si/si2007/pdf/uksi\\_20073454\\_en.pdf?lang=e](http://www.opsi.gov.uk/si/si2007/pdf/uksi_20073454_en.pdf?lang=e)

Data Protection Act 1998

[http://www.ico.gov.uk/what\\_we\\_cover/data\\_protection.aspx](http://www.ico.gov.uk/what_we_cover/data_protection.aspx)

Electricity at Work Regulations 1989

[http://www.opsi.gov.uk/si/si1989/Uksi\\_19890635\\_en\\_1.htm](http://www.opsi.gov.uk/si/si1989/Uksi_19890635_en_1.htm)

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Appendix 1

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Disposals Form

This form must be completed, and authorised, before any item of surplus equipment is removed from the school site. An entry should also be made in the inventory as appropriate.

Date: \_\_\_\_\_

Description of equipment:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Reason for disposal:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Item disposed of by sale to: \_\_\_\_\_ amount received \_\_\_\_\_

Item disposed of by donation to: \_\_\_\_\_

Is the item on the inventory: YES/NO \*  
(please delete as appropriate and ensure entry is made in the inventory if answer is yes.)

Headteacher/Deputy Headteacher or Chair of Governors to sign to verify:

- Authorisation of disposal
- Any electrical equipment sold or given away has undergone a recent electrical safety check and holds a valid PAT certificate
- Any software included which is being sold or given away is legitimately licensed
- Consideration has been given to the secure removal of data

Print name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

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Appendix 2

Guidance from Herts County Council on the disposal of electrical equipment, including the secure disposal of data.

Waste Electrical and Electronic Equipment (WEEE) Directive.

The WEEE directive came into force, in England, 1st July 2007. It aims to minimise the impact of Waste Electrical and Electronic Equipment on the environment by increasing the re-use and recycling of old computers, electrical equipment, etc. thereby reducing the amount that goes into landfill sites.

Manufacturers of electrical and electronic equipment (EEE) now have an obligation to assist with the disposal of waste equipment. Manufacturers must sign up to a WEEE compliance scheme. There are numerous schemes available which will affect the service or assistance offered.

For schools this means no ICT equipment can be disposed of through the school's general waste collection process.

Any computers, or storage media, that may have held personal or confidential data must have their hard drives 'scrubbed' either before or as part of the disposal process. This is to ensure you do not contravene the Data Protection Act.

WEEE purchased on or after 13th August 2005

Any WEEE (waste computers, etc) purchased on or after 13th August 2005, that you wish to dispose of, are the responsibility of the manufacturer. That is, the manufacturer of this WEEE is obliged to dispose of the waste equipment Free of Charge (eg RM or DELL). However, whilst the disposal of the WEEE is free there will be a cost for transportation to the 'nominated' collection centre. For example, RM charge £4 per item (August 2009).

Notes:

RM do not manufacture monitors, therefore you will have to contact the manufacturer direct or arrange for them to be disposed of through one of the alternative methods.

Many manufacturers require the request be submitted within a maximum of 30 days following dispatch of new equipment.

WEEE purchased before 13th August 2005

If you are purchasing new EEE (computers, etc) to replace existing equipment that was purchased before 13th August 2005 it is the responsibility of the manufacturer (of the new equipment) to dispose of any items (on a one to one basis, eg one new computer for one old computer) Free of Charge. Again you may bear a cost for transportation to the 'nominated' collection centre.

If you are disposing of WEEE – purchased before 13th August 2005 - that is not being replaced by any new purchase the school will need to arrange for its lawful disposal. There will be a charge for this - see below.

What do you need to do?

EEE manufacturers that are compliant with the WEEE Directive will have a form that needs to be completed and returned to them as soon as possible and generally within 30 days of the new equipment having been dispatched by them.

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The following are examples of some Hertfordshire County Council 'preferred' suppliers / manufacturers that are WEEE compliant.

RM [www.rm.com/weee](http://www.rm.com/weee)

RM arrange collection of the WEEE (Base unit/server/other peripherals) as well as the disposal. Just complete the forms on their web site.

How do I arrange disposal of the old monitor?

RM do not manufacture all the monitors they sell and hence have no obligation to provide a historic WEEE service for the monitors they replace. This is because they are acting in the capacity of a Distributor for these monitors and do not hold any obligations for business to business sales under the WEEE Directive.

Should you still wish RM to dispose of any old monitors at the same time as the computers, you can purchase the disposal service at £20 per monitor, including collection and disposal. Correct August 2009.

DELL

the following is taken from the DELL website – August 2009

Under UK WEEE legislation, from 1st July all new Dell orders invoiced after 13th August 2005, Dell will recycle the historic product on a like for like and one for one basis. In the UK, your entitlement is not limited to Dell branded end of life product. You will find Dell's UK Compliance statement at [www.dell.co.uk/asset-recovery](http://www.dell.co.uk/asset-recovery)

If you have a product which qualifies under WEEE legislation and have already accepted delivery of your new Dell orders, please go to [www.dell.co.uk/asset-recovery](http://www.dell.co.uk/asset-recovery) and click on the WEEE compliance link. Beneath the WEEE compliance statement for the UK, you will find a link to their WEEE request form. Please open this, fill in the information required and submit it to the Dell Recycling team.

Once they receive the form with all required information they can then progress your request and authorise their WEEE Partner to contact you with instructions and reference numbers so you can arrange for delivery of the qualifying equipment to the collection hub closest to you. (If you need a logistics solution, their service provider can also provide you with a quotation for this service)

Hewlett Packard [http://www.hp.com/hpinfo/globalcitizenship/environment/recycle/Hewlett Packard: Product Recycle](http://www.hp.com/hpinfo/globalcitizenship/environment/recycle/HewlettPackard:ProductRecycle) HP do not include the transport of the equipment to a 'nominated' collection centre. You will need to either arrange delivery to one of these centres or you can contact HP to collect. See the HP web site for more information <https://h41268.www4.hp.com/live/index.aspx?qid=2537> form to complete for quote, etc  
Brother [http://www.brother.co.uk/g3.cms/s\\_page/50870](http://www.brother.co.uk/g3.cms/s_page/50870)

After purchasing new Brother equipment you should register it at the above web site.

#### Frequently Asked Questions

Q1: Are all manufacturers WEEE Compliant?

They should be but if they are not then it will be the responsibility of the school to arrange correct disposal of WEEE. WEEE compliant companies have a registration number. Before making purchasing decisions you should establish whether the provider (of the new equipment) is WEEE compliant. If they are not there will be a charge for the disposal of any WEEE so you should include this in any cost comparisons you make when considering new EEE purchases outside the Hertfordshire CC approved procedures (Contract and Financial Regulations).

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Q2: I need to dispose of a computer that may have held personal or confidential data. Do I need to do anything to ensure I do not contravene the Data Protection Act?

It is essential that any hard drives which may have held personal or confidential data are 'scrubbed' in way that means the data can no longer be read. It is not sufficient to simply delete the files or reformat the hard drive. Whoever you appoint to dispose of the equipment must provide a written guarantee that they will irretrievably destroy the data by multiple over writing the data.

Hertfordshire Business Services, RM and RecycleIT all offer this service.

Q3: I need to dispose of more items of WEEE (that were purchased before 13th August 2005) than I am purchasing new, what do I do?

[Hertfordshire Supplies](#) offer a chargeable service.

For more information contact Martin Rumble, 01707 292366, fax 01707 292337, martin.rumble@hertsc.gov.uk

RM also offers a chargeable service to dispose of old WEEE.

Go to the RM site [www.rm.com/weee](http://www.rm.com/weee) and access the 'Purchase a collection and disposal service' to request a quote.

There are several companies who provide a free disposal service, including the collection, to schools. However, unless you have a large number of items for disposal it is likely you will have to wait a few weeks for the collection. Such a company is found at [www.recycledit.co.uk](http://www.recycledit.co.uk) Many other companies also offer a WEEE disposal service

Q4: What about other waste electrical and electronic equipment?

The Waste Electrical and Electronic Equipment (WEEE) Directive covers electrical products up to and including 1,000 volts AC and 1,500 volts DC that fall into the following 10 categories:

Large household appliances

Small household appliances

ICT equipment

Consumer equipment

Lighting equipment

Electrical and electronic equipment

Toys, leisure and sports equipment

Medical devices

Monitoring and control equipment

Automatic dispensers

If you purchase such items through Hertfordshire Supplies you will be provided with relevant disposal guidance as this becomes available.

If you choose to purchase from other suppliers you need to ensure the provider is WEEE compliant or accept responsibility for the correct disposal of any resultant WEEE.

Q5: If we purchase our EEE through SITSS or Hertfordshire Supplies are they responsible for its disposal?

School IT Systems Support and Hertfordshire Supplies are 'non-household EEE distributors' and will facilitate the Producer Compliance Scheme as they become available. This means we will make best endeavours to provide you with the relevant information on how the approved providers are meeting the new WEEE directive.

Q6: What does it cost to dispose of computers, etc through Hertfordshire Business Services?

A: There is a charge of £71.50 per pallet load, with each pallet holding between 14 and 16 'units / items'. See the table below to help estimate the cost. This charge is regardless of whether you have a full pallet for collection so it is advisable to accumulate items for disposal or see if there is another school in the area with whom you could split the costs. Plus an

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additional Environmental Agency administration cost of £32 per collection.  
Correct August 2009.

Cost per pallet: £71.50

Asset Tracking: £9.75 per pallet (recommended for base units containing sensitive data)

Total cost = £81.25 per pallet (if it includes a computer with sensitive data)

Plus an additional Environmental Agency administration cost of £32 per collection.

Q7: Do I need to register as a 'Producer of Hazardous Waste'?

A: In addition to contracting a registered carrier to dispose of the equipment for you, you may find that your school needs to register with the Environment Agency as a 'Producer of Hazardous Waste'. This depends on the weight of computer & electrical equipment you need to dispose of in any 12 month period.

If you find that you have 500kg or more of equipment to dispose of in a 12 month period you need to register and pay a fee:

£18.00 if you register via the Internet

<http://www.environment-agency.gov.uk/business/>

you will need to pay via debit or credit card

£23.00 if register via paper form which you can download from the website (follow the instructions as for the online application) Alternatively you can add it to your order to Hertfordshire Supplies and they will register you themselves

£23 if you register by telephone on 08708 502 858 (you will need to pay via debit or credit card)

This registration is valid for 12 months. You can decide to register when / if you are likely to exceed the 500kg limit in any 12 month period.

Q7.i: Will I have to renew this registration on an annual basis?

Not necessarily. If you are unlikely to exceed the 500kg limit in the 12 month period after your registration expires you do not need to renew it.

Q7.ii: How do I work out the cost of disposal and whether I need to register as a 'Producer of Hazardous Waste'?

A: You can contact Naj Bheekhee, Hertfordshire Supplies, e-mail: [naj.bheekhee@hertscc.gov.uk](mailto:naj.bheekhee@hertscc.gov.uk)

Tel: 01707 292308

Alternatively the following table gives a guideline of how many 'units / items' different pieces of computer equipment are equivalent to. In addition some of the items include their approximate weight to help you decide whether your school will exceed the 500kg limit in a 12 month period.

Item description	'unit' equivalent for pallet	Approx weight
PC Base Unit - mini tower case	1	12 kg
PC Base unit - desktop case	1	9 kg
17" CRT monitor	1	14 kg
Small laser printer, e.g. Brother HL1250	1	10 kg
Large laser printer, e.g. Hewlett Packard 4S	Probably 2	25 kg
Uninterruptable Power Supplies (UPS)		
It is best to arrange for faulty UPS to be taken away by the company from which you purchase replacements.		
Model 650	1	11 kg
Model 670	1	19 kg

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Model 980	1 or 2	24 kg
Model 2200	Probably 2	30 kg
Laptop	1	
Docking station	1	
Small file server	1	

Other non-ICT electrical equipment can be disposed of in these pallets, simply list all items on the forms available from Hertfordshire Supplies. Large items can be quoted for separately if required.

#### Glossary

EEE - Electrical and Electronic Equipment

WEEE - Waste Electrical and Electronic Equipment

Nominated collection centre - This is the location nominated by the provider of the WEEE where you can take equipment that is for disposal

Designated collection centre - Same as nominated collection centre

Preferred supplier - Companies that have been through a Hertfordshire County Council process for Best Value

Further information available at:

Waste Electrical and Electronic Equipment (WEEE) Regulations

Environment Agency web site

Introduction

<http://www.environment-agency.gov.uk/business/topics/waste/32084.aspx>

The Waste Electrical and Electronic Equipment Regulations 2006

[http://www.opsi.gov.uk/si/si2006/uksi\\_20063289\\_en.pdf](http://www.opsi.gov.uk/si/si2006/uksi_20063289_en.pdf)

The Waste Electrical and Electronic Equipment (Amendment) Regulations 2007

[http://www.opsi.gov.uk/si/si2007/pdf/uksi\\_20073454\\_en.pdf?lang=e](http://www.opsi.gov.uk/si/si2007/pdf/uksi_20073454_en.pdf?lang=e)

Information Commissioner website

<http://www.ico.gov.uk/>

Data Protection Act – data protection guide, including the 8 principles

[http://www.ico.gov.uk/for\\_organisations/data\\_protection\\_guide.aspx](http://www.ico.gov.uk/for_organisations/data_protection_guide.aspx)

Personal Information Promise – new to ICO website 2009

[http://www.ico.gov.uk/upload/documents/pressreleases/2009/personal\\_information\\_promise\\_280109.pdf](http://www.ico.gov.uk/upload/documents/pressreleases/2009/personal_information_promise_280109.pdf)

To view the promise

[http://www.ico.gov.uk/upload/documents/personal\\_info\\_promise/pip%20final.pdf](http://www.ico.gov.uk/upload/documents/personal_info_promise/pip%20final.pdf)

The personal information promise is:

I (name and title), on behalf of (name of organisation) promise that we will:

1. value the personal information entrusted to us and make sure we respect that trust;
2. go further than just the letter of the law when it comes to handling personal information, and adopt good practice standards;
3. consider and address the privacy risks first when we are planning to use or hold personal information in new ways, such as when introducing new systems;

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4. be open with individuals about how we use their information and who we give it to;
5. make it easy for individuals to access and correct their personal information;
6. keep personal information to the minimum necessary and delete it when we no longer need it;
7. have effective safeguards in place to make sure personal information is kept securely and does not fall into the wrong hands;
8. provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly;
9. put appropriate financial and human resources into looking after personal information to make sure we can live up to our promises; and
10. regularly check that we are living up to our promises and report on how we are doing.

To sign up to the Promise

[http://www.ico.gov.uk/about\\_us/news\\_and\\_views/current\\_topics/personal\\_info\\_promise.aspx](http://www.ico.gov.uk/about_us/news_and_views/current_topics/personal_info_promise.aspx)  
go down to the bottom of the page

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