

# General Practice Equipment Disposal Procedure

## **Preface**

Eventually every computer will come to the end of its life and must be disposed of. There may be liabilities associated with the subsequent access of the equipment, and such systems may contain disks that hold information that is confidential; thus some care has to be taken over their disposal.

This document sets out the exact steps that need to be taken to ensure that all GP equipment is disposed of in the appropriate manner in terms of confidentiality and environmental waste regulations.

## **Revision History**

<b>Version</b>	<b>Details of Revision</b>	<b>Revision Date</b>
1	Original Issue By Chris Smith	10/10/05
2	Details added for the disposal of GP File Servers, Mail Servers and Clinical Servers. By Chris Smith	03/03/06

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## **1. Introduction**

When you are clearing out a filing cabinet, you consider how papers should be disposed of. Some information will have such little intrinsic value to others that it can safely be thrown in an open waste paper basket; other documents will contain particularly sensitive information, in which case shredding is essential.

The same considerations apply when disposing of IT equipment, especially those with disks of information and data. In particular, if any files on disk contain personal or other sensitive or confidential data then special care must be taken to ensure that this information cannot be accessed by anyone. There have been high profile cases where this care has not been adequately exercised; the Data Protection Act requires that these issues are given serious consideration.

Also careful thought has to be given to the licensing conditions of any software that is on the disk. For example, old PCs could be disposed of by returning them to the owner with the original Operating System installed. However any Microsoft Office products, purchased and installed under NHS agreements for example must be removed in order to fulfil the licensing conditions.

In addition, there are obligations that must be met for any person receiving the equipment in relation to its electrical safety that may represent a continuing liability or environmental implications in disposing of computer equipment.

**Further information can be found in the Electrical Equipment (Safety) Regulations 1994 and the Environmental Protection Act 1990 (Section 34), Environmental Protection (Duty of Care) Regulations 1991 and 2005 Waste Electrical Equipment (WEE) Directives.**

## **2. Definitions**

### **2.1 Equipment**

In this policy, computer equipment means personal computers, laptops, file servers, mail servers and clinical servers, plus computer peripherals such as printers & scanners.

### **2.2 Asset Controller**

The asset controller is the physical owner of the item. If the equipment was purchased by an individual GP then they are the physical owner, if it was provided by the PCT then it is they who have the responsibility (via Manchester NHS Informatics) for the management of the asset.

### **2.3 Custodian**

The custodian is the person who works with the computer on a day-to-day basis and will have a detailed knowledge of the nature of the equipment and any software or information contained in it.

### **2.4 Responsibilities**

The asset controller (who may be the custodian) of the equipment has full responsibility for ensuring safe disposal under this policy. Normally the custodian will be the person who uses it in the case of desktop systems and for servers the custodian may be the administrator.

The asset controller should take advice from the custodian relating to the software or information contained on the equipment.

### **3. Procedure**

Upon request an assessment will be made upon the equipment this will often be via a helpdesk call but may also be invoked by an engineer as part of a related job. The need to condemn a piece of equipment may not always be decided there and then as often equipment is returned to the logistics engineers who then further diagnose the problem and if possible investigate the cost of repair. If found to be justifiable then it will be repaired and returned to the custodian.

Regardless of the path the equipment has taken there are really only four reasons for disposing of equipment, they are as follows :-

- ⇒ Redundant (fully functioning)
- ⇒ Redundant (not functioning)
- ⇒ Broken (reasons known)
- ⇒ Broken (reasons unknown)

All GP equipment should be automatically replaced as part of the rolling replacement programme, however there are likely to be some exceptional circumstances where equipment becomes redundant mid-term in this replacement program due to specific machines needing to run specialised software where the cost of PC's has not been taken into consideration.

In all instances an assessment (triage) 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 inventory system. A copy of this assessment form can be found in Appendix B.

#### **3.1 Redundant Equipment**

This is equipment that is no longer fit for purpose and is incapable of running the standard software deployed at the time. Typically this will be equipment that is three years of age or older which is in line with the rolling replacement programme.

Redundant equipment that is not working will automatically qualify as scrap.

#### **3.2 Broken Equipment**

This is obviously equipment that is not working and is out of warranty. Broken equipment that can not be repaired will automatically qualify as scrap.

It is also possible that broken equipment that can be repaired will qualify as scrap when the cost of repair is greater than, equal to or just less than the cost of replacement. It may also be where the cost of repair is financially inappropriate, such as equipment which is 2 ½ years old and is therefore due to be replaced in the near future.

### 3.3 Disposal Methods

In all instances there are only two ways in which this equipment may be disposed of and this will be dependant on who the physical owner of the equipment is.

In the case of PC's & Laptops and peripherals, for redundant functioning equipment owned by the GP, it would be appropriate for the equipment to be wiped and then passed back to the owner for personal use at home. This equipment must not remain on site as this would invalidate the rolling replacement programme. If the GP does not want it back then the ownership transfers to the PCT.

In the case of Servers, for redundant functioning equipment owned by the GP, it would be more appropriate for the equipment to be wiped and the ownership then transferred to the PCT for re-deployment. This is the preferred method of disposal for Servers, however Servers can be processed and returned to the GP if requested.

For redundant functioning equipment owned by the PCT (including equipment passed to the PCT from a GP), it would be appropriate for this equipment to be broken down as spares for other units that may yet have a small element of life within them. If no spares can be claimed from the unit then it will automatically be scrapped.

### 3.4 Equipment Processing

If a PC, Laptop or Server is to be returned to the GP owner or scrapped the Hard Disk Drives (HDDs) contained there in must be wiped using the 3 pass US DoD 5220.22-M algorithm to ensure the data is completely unrecoverable.

It must also be returned with the original operating system (OS) installed using the individual licence key that first came with the equipment. Under no circumstances should the NHS corporate licence key be used.

If no such licence key is available then the equipment will be returned "flat" without any operating system. It will then be up to the GP to purchase a licence and install the OS themselves.

Also if the equipment is returned to the GP it is done so as is with no warranty and without liability for electrical compliance with statutory law. It is recommended that the GP get the device certified under PAT (Portable Equipment Testing) regulations.

Under absolutely no circumstances can any computer equipment be directly sold to any individual or other organisation whilst the GP is acting in an official capacity. Private sales are entirely at the owner's discretion. No computer equipment should be disposed of via undesignated skips, dumps, landfill etc.

Detailed flowcharts showing these processes and the steps there in can be found in Appendix A.

It is important to note that when the ownership of a Server is transferred to the PCT, where ever possible, it will be re-deployed elsewhere rather than be scrapped.

This stance is primarily taken because of the cost difference in PCs to Servers (servers are significantly more expensive to purchase), but also because the internal architecture of servers and the components contained therein, tend to depreciate less than that of PCs.

This re-use will be at either the whole unit level or component level. In either case any HDDs will be wiped as stated above prior to re-deployment.

### 3.5 Appropriate Disposal

All equipment disposals will be undertaken within current and future Waste Electrical Equipment (WEE) Legislation, the cost of which will be met by the PCT.

However Manchester NHS Informatics reserves the right to review this arrangement, with prior notification as more equipment falls within the WEE directive.

### 3.6 Electrical Liability & Warrantee

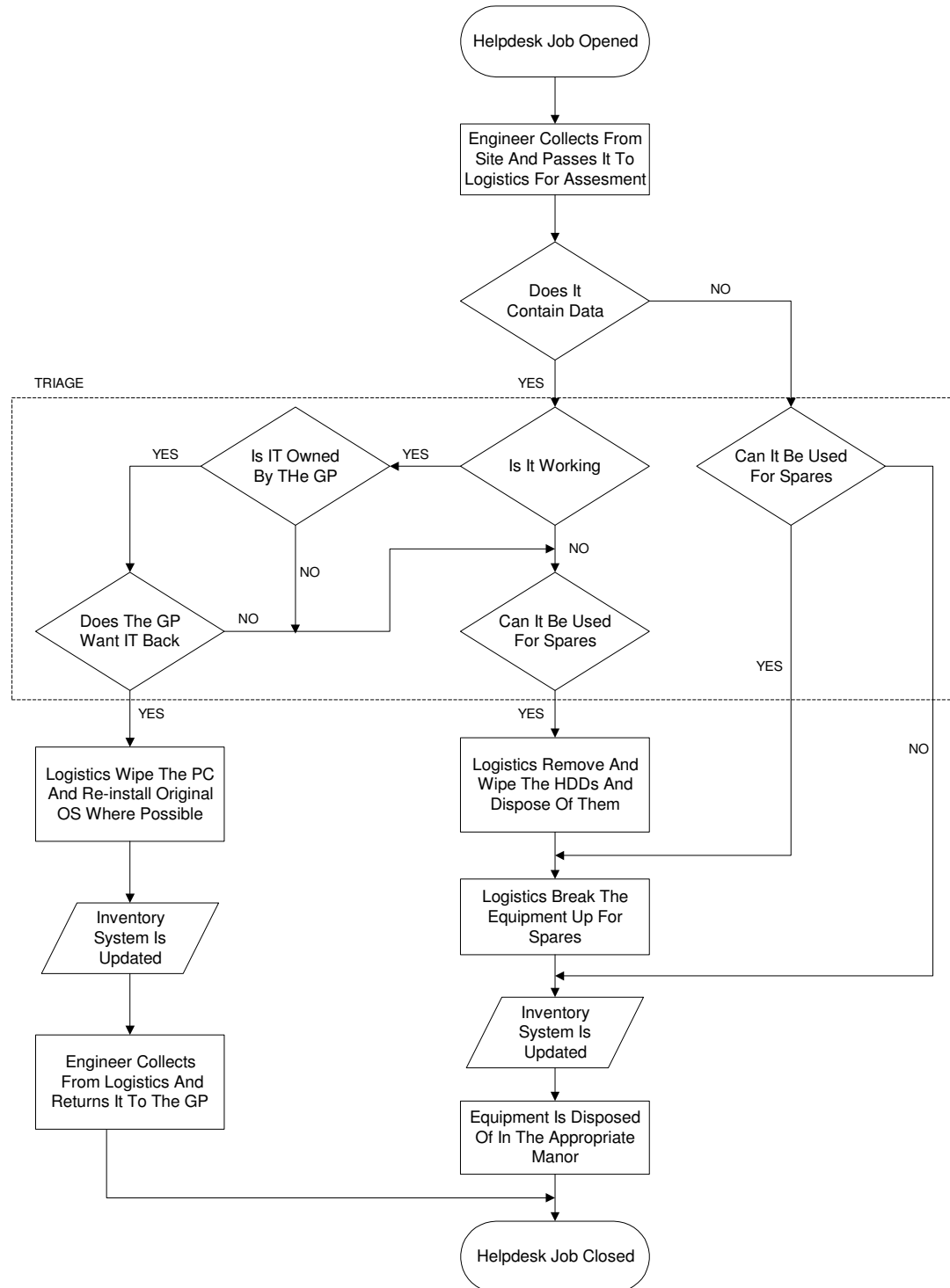
Manchester NHS informatics strongly recommends that any equipment that is returned to a GP is tested for electrical safety by the GP when they receive it.

This additional service can be provided by Manchester NHS Informatics, at cost to the GP, by way of their Portable Appliance Test (PAT) procedures. However it must be clearly understood that it is the responsibility of the GP to ensure the continued electrical safety of their equipment thereafter and not the PCT or Manchester NHS Informatics.

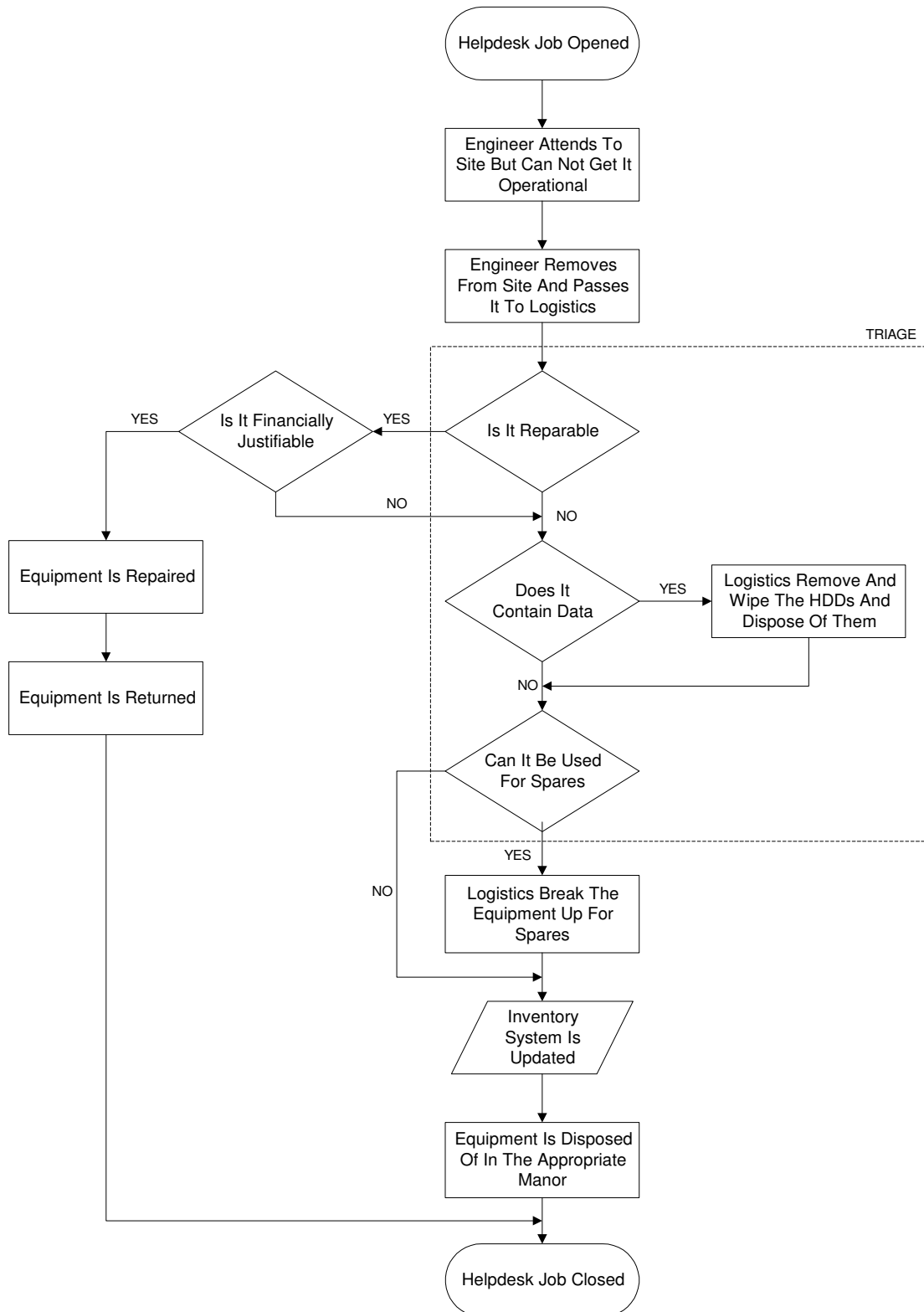
Manchester NHS Informatics does not provide any warrantee for any equipment returned and can not be held responsible for the failure of any item after it has been returned. Also Manchester NHS Informatics can not be held liable for the electrical safety of any equipment that does not have a PAT certificate.

# Appendix A – Procedural Flow Charts

## A1. Redundant Equipment



## A2. Broken Equipment



## **Appendix B – Equipment Assessment (Triage)**

### **Manchester Informatics EQUIPMENT DISPOSAL ASSESSMENT FORM**

<b>Section 1 - General Information</b>	
INVENTORY NUMBER	
DEVICE	Sever / PC / Laptop / Scanner / Printer / Other (please circle one)
MAKE	
MODEL	
OWNER	GP / PCT / Other _____ (please circle one and specify other)
REASON FOR ASSESSMENT	
<i>If Redundant please skip to Section 3</i>	Redundant / Faulty (please circle one)
<b>Section 2 - Assessment</b>	
HAS THE EQUIPMENT BEEN ASSESSED : Yes / No	
If not why not _____	
_____	
CAN THE EQUIPMENT BE REPAIRED : Yes / No	
IS THE REPAIR FINANCIALLY JUSTIFIABLE : Yes / No	
<i>If the equipment can be repaired but disposal goes ahead authority is required (See Below)</i>	
<b>Section 3 - Disposal</b>	
CAN THE EQUIPMENT BE USED FOR SPARES : Yes / No	
HAVE SPARES BEEN EXTRACTED : Yes / No	
DOES THE EQUIPMENT CONTAIN DATA : Yes / No	
HAVE THE HDDs BEEN REMOVED FOR SHREDDING : Yes / No / NA	
<i>If the equipment does not contain data this question is not Applicable (NA)</i>	
<b>Section 4 - Confirmation and Authorisation</b>	
TRIAGE COMPLETED BY _____ DATE ____ / ____ / ____	
SIGNED _____	
PROPOSED DATE FOR DISPOSAL OF NON WEE ITEMS ____ / ____ / ____	
PROPOSED DISPOSAL DATE FOR WEE ITEMS ____ / ____ / ____	
EQUIPMENT AUTHORISED FOR DISPOSAL UNDER SECTION2	
AUTHORISED BY _____ DATE ____ / ____ / ____	
SIGNED _____	