



DISPOSAL OF ICT EQUIPMENT

September 2021

To be reviewed Sept 2022

INTRODUCTION

James Montgomery Academy Trust (hereafter referred to as JMAT) understands the importance of correctly disposing redundant ICT equipment to ensure safe removal of hazardous substances and sensitive data.

LEGAL FRAMEWORK

As part of the European Union Waste Electrical and Electronic Equipment (WEEE) Directive (2003) and existing waste management legislation, including the Duty of Care and Hazardous Waste Regulations, JMAT recognises their environmental responsibilities.

ICT equipment is built using a number of hazardous materials such as lead, cadmium and mercury. Disposal poses a real threat of pollution to our water, air and land. Some components are also made using various materials including precious metals which is important to reclaim.

The General Data Protection Regulations (2018), protects the use of personal data and ensures that those who are authorised to use it keep it private and secure. Please see the JMAT's Data Protection policy for further details. Under the GDPR (2018) it is the school's responsibility to remove any personal data stored on the hard drives of computers.

PROCEDURES

In order to adhere to the GDPR (2018) any computers, or storage media, that may have held personal or confidential data must have their hard drives 'formatted' either before, or as part of the disposal process. It is not sufficient enough to safeguard information from being recovered by deleting data from computer equipment, specialist software may need to be used if necessary.

JMAT understands the importance of ensuring sufficient removal of personalised data, confidential data or any other data associated with the GDPR (2018) from the disc or memory of the ICT equipment. This also includes deletion of data from any other computer media disposed with the ICT equipment (e.g. CDs).

The ICT support department must be informed of an item that requires disposal of so they may check that the item is out of warranty, fully depreciated and not leased. If the item has been purchased under a lease agreement the ICT support department will liaise with the Finance Department regarding its disposal.

The disposal of ICT equipment may require approval from the governing body prior to disposal.

All ICT equipment marked for disposal is kept in a central place within the school or the JMAT ICT office in Ellis House. Once a critical mass of redundant equipment is reached, disposal takes place. The disposal (including proper destruction of data) of all JMAT ICT equipment is outsourced to a specialist company, Enviroelectronics (Doncaster) which is certified for this type of work.

Documentation and Audit Trails

JMAT maintains a comprehensive inventory of its ICT equipment, software and resources. When items of equipment are disposed of it will be recorded against its inventory record.

All disposal of ICT equipment should be documented and the following should be recorded:

- Name of the person who authorised the disposal
- Date the item was disposed
- How the item was disposed of (if different from standard procedure by Enviroelectronics)
- Organisation and contact details of person who received or handled the disposed item (if different from standard procedure by Enviroelectronics)
- Name of the person who checked/removed the software-licensing (only if applicable)

After Enviroelectronics has completed the destruction of data, a report will be sent either by the JMAT ICT team or the school. If the report is received by the JMAT team, it will forward this information to the school in question.