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For the future you want

Secure Disposal of IT Equipment & Information Policy



Estates Services & IT

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1. INTRODUCTION

The College holds and processes a large amount of information and is required to protect that information in line with relevant legislation and in conformity with College regulations and policies such as the [Information Security Policy](#), the [Data Protection Policy](#), and the Records Management Policy. This policy sets out the requirements for staff on the secure disposal of the College's IT equipment and information.

The disposal of such equipment is due to its need for replacement, upgrade, or because it has become obsolete, surplus or redundant. The following are important factors in equipment disposal:

- IT equipment may contain data or information that must be protected.
- The equipment could represent an existing asset value.
- The equipment may be reused or recycled.
- The equipment must be disposed of safely according to legislation and in an environmentally sustainable way.

Edinburgh College aims to ensure that all of its IT equipment is managed effectively, including its disposal. Responsible IT asset management and disposal is essential for compliance with the Data Protection Act 2018.

2. OBJECTIVES

This policy aims to ensure:

- Compliance with Data Protection Act 2018 through secure disposal of personal data.
- Compliance with the [Information Security Policy](#) and Records Management Policy. Erasure of confidential or sensitive non-personal data to avoid breach of confidence, breach of contract or commercial damage.
- Erasure of software which is under licence to avoid breach of licencing conditions.
- Compliance with WEEE Directive (Waste Electrical and Electronic Equipment) through appropriate disposal of IT equipment.

3. RESPONSIBILITIES

It is the responsibility of all College staff to ensure that the information held by the College is disposed of appropriately and that all sensitive information is disposed of securely.

All College staff are responsible for compliance with this policy. All staff have responsibilities under the Data Protection Act 2018 and must make all reasonable efforts to prevent any personal data held from being accidentally or deliberately compromised.

The IT Department is responsible for the appropriate destruction or disposal of equipment in compliance with waste regulations and for providing the College's Finance Department with a record of all such disposal within an agreed timeframe. The IT Department should be made aware of any IT equipment in need of disposal.

Responsibility for this policy resides with the College's Executive team. Implementation of this policy is managed through the College's Information Governance Group which reports to the Vice Principal Corporate Development.

4. DEFINITIONS

Secure Disposal

Secure disposal refers to the process by which all information, including information held on IT equipment, is irretrievably destroyed in a manner which maintains the security of the equipment and information during the process and up to the point of irretrievable destruction.

IT Equipment

IT equipment means all computing or related equipment purchased by or provided by Edinburgh College to store or process information including but not necessarily limited to: desktop computers, servers, printers, copiers, laptops, tablet computers, electronic notebooks, mobile telephones, digital recorders, cameras, USB sticks, DVDs, CDs and other portable devices and removable media.

Information

For the purpose of this policy, information means all data held or recorded electronically on IT equipment.

For the purpose of this policy, the information held by the College can be divided into two categories: non-sensitive and sensitive information. Sensitive information comprises of all personal information, the loss of which would, or would be likely to, cause damage or distress to individuals or to the College.

For the purpose of information disposal, all information is deemed to be sensitive unless specifically identified as otherwise.

5. POLICY

This policy on disposal, covers all data or information held by the College whether held digitally or electronically, on IT equipment or as manual records held on paper or in hard copy.

It is the College's policy to ensure that all information held by the College is disposed of appropriately, in conformity with the College's legal obligations and in accordance with the College's regulations and Records Management Policy.

It is the College's policy to ensure that all sensitive information which requires disposal is disposed of securely.

Where information is held on IT equipment, it is the policy of the College that such information will be assumed to hold sensitive information and that all information residing on such equipment must be disposed of securely.

WEEE: IT equipment must also be disposed of in line with the EU Waste Electrical and Electronic Equipment (WEEE) Directive and the UK Waste Electrical and Electronic Equipment Regulations 2006.

Copyright software must be disposed of in line with copyright legislation and software licencing provisions.

6. IT EQUIPMENT

The main types of IT equipment that can record or hold data, includes:

- PCs
- Laptops
- Mobile phones
- USB memory sticks and external hard drives
- Servers
- Tablets
- Multi-functional devices – printers/scanners

IT staff identify all such devices that they manage and ensure that these are recorded in an asset register.

All managed IT equipment which has been purchased by Edinburgh College has an asset tag assigned to it. Where practical, the asset tag is physically visible on the equipment stipulating that it is the property of Edinburgh College.

The asset register also includes the asset number and the details of each piece of equipment including the serial number, the make, model, the date of purchase, who it is assigned to and the location.

All staff and managers must follow the approved disposal/destruction process for IT equipment to ensure that the risk of any loss of sensitive information or data breach is negated.

All IT equipment that is identified for disposal is marked as such in the asset register.

Staff holding College 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.

Data deemed to be removed from IT devices or media, involves putting the information in an irretrievable position. Data held in a recycling 'bin' on the device or data which can be easily recovered by the user are not regarded as

being 'irretrievable' or 'beyond use' and may still be subject to discovery and disclosure under information law (Freedom of Information, Data Subject Request) or litigation.

Staff should never dispose of College IT equipment (device or media) without taking appropriate steps to ensure the irretrievable deletion of data held on the equipment.

Staff should be mindful that College mobile phones contain data which will need to be extracted or deleted from the device before the device is disposed of. The mobile phone should be returned to the IT department to initiate the secure return and disposal of the device.

Staff responsible for the contracts relating to College leasing equipment (such as multi-function copiers) should ensure that the leasing contract certifies the secure disposal of any College data held on devices during the period of lease.

7. ONLINE DATA

Online data such as in Google accounts provided to staff by the College for the purpose of their employment are not automatically deleted when staff leave the College. These accounts are de-activated and access to the data retained for any necessary business purpose. Staff should ensure appropriate management and handover of the College data prior to leaving the College.

8. ASSET DISPOSAL PROCESS

Full details of the asset disposal process are covered in the [Asset Disposal Procedure](#).

9. POLICY REVIEW

This policy should be reviewed whenever changes effect it or within two years, whichever is the earliest.