IT Services Policy/Policy Document

DG10 - IT Equipment Disposal - Policy

Prepared by: <Shelim Miah>
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- Henrik Brogger, Head of Service Delivery
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- Paul Smallcombe, Records & Information Compliance Manager

**Policy Owner:**
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**Revision History**

<table>
<thead>
<tr>
<th>Version</th>
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<th>Author</th>
<th>Date</th>
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<tr>
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<td>Shelim Miah</td>
<td>15/01/2018</td>
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**Authorisation:**

<table>
<thead>
<tr>
<th>Name / Position</th>
<th>Rhys Davies, Chief Information Officer, IT Services</th>
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<tbody>
<tr>
<td>Signature</td>
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<td>Date</td>
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1. **Policy Statement**

1.1 IT equipment must be disposed of in accordance with both QMUL policy, industry best practice and satisfy IT equipment disposal legislation, regulatory, and contractual obligations placed upon QMUL.

1.2 The Policy aims to:

- Outline the expectations of those disposing IT equipment.
- Ensure the security and protection of QMUL data.
- Implement controls to safeguard against misuse of IT Equipment
- Outline roles & responsibilities
- Enhance communications

2. **Scope**

2.1 This policy applies to all staff who wish to dispose of any IT equipment. This includes any device that stores/processes electronic data.

3. **Policy Detail**

3.1. Queen Mary University of London (QMUL) departments must adhere to this policy and take the appropriate steps to ensure that QMUL is protected from any future liability when disposing of end user devices and all other IT and infrastructure equipment (referred to as IT equipment in the rest of the document).

3.2. Where the IT equipment is no longer required by owning department, reasonable efforts shall be made to see if any other unit within QMUL is able to make use of the equipment, where this is permitted by any contractual agreement under which the equipment was purchased or supplied.

3.3. All IT equipment, which cannot be utilised or is no longer operable must be disposed of in accordance with health, safety and environmental regulations and data protection legislation. Staff will not be permitted to have or purchase any old hardware. Where IT equipment has residual value, consideration should be given to donating the IT equipment and to a recognised QMUL approved charitable organisation, provided that it is safe to use, all information has been securely removed and it is made explicitly clear that QMUL holds no future liability for it.

3.4. Where a third party disposal company is used for disposal, they must be QMUL approved suppliers and specialise in the secure disposal of waste electrical and electronic equipment (WEEE) including IT equipment.

3.5. QMUL approved suppliers and manufacturers have an obligation to recycle any brand of IT equipment purchased before 13 August 2005, on a like for like basis, when new equipment is being purchased from the supplier and to provide recycling for equipment purchased from the supplier after 13 August 2005.

3.6. It is also worth noting that the European Union Directive 2012/19/EU on waste electrical and electronic equipment (WEEE) sets collection, recycling and recovery targets for all types of...
electrical goods and imposes a responsibility for the disposal of waste electrical and electronic equipment on the manufacturers of such equipment.

3.7. IT equipment owners must dispose of IT equipment through IT Services (ITS) to ensure a consistent approach to disposing of IT Equipment.

3.8. ITS must maintain records of all IT equipment disposed of via a disposal contractor for tracking and audit purposes.

3.9. For any hazardous WEEE that is to be collected by a contractor a consignment note must be produced and signed by the contractor and counter signed by a designated QMUL staff.

3.10. For non-hazardous WEEE disposal, a waste transfer note is to be provided where a contractor is used. Copies of consignments for both hazardous and non-hazardous WEEE must be retained by ITS.

3.11. Before any IT equipment is disposed (including any significant change of use of the equipment, e.g. from one department to another), a risk assessment must be carried out and documented on sensitivity held on the equipment and the chosen method of disposal.

3.12. All data must be removed from any IT equipment being disposed; using the appropriate QMUL approved data removal methods and must be used in line with any contractual obligations relating to the equipment. See DG16 – Disposal of Information.

3.13. No IT equipment or storage media is to leave QMUL premises for disposal without first removing all data and user files. The only exception to this is if a third party is required to be used to remove the data as part of the contracted disposal process, provided that the equipment is not excluded from being disposed of in this manner by contractual or other agreements.

3.14. Where a third party is used to undertake the disposal process, the company must be suitably accredited and provide a certificate to confirm that data has been securely destroyed, a copy of which must be kept by ITS and the equipment owner. There must be a data processing agreement in place with such a third party to cover disposal of any personal data.

3.15. Where contractual obligations do not permit the removal of data from IT equipment by third parties, the default method for data removal should follow the method specified in those contractual obligations.

3.16. Asset owners/controllers are responsible for transferring, archiving, manually deleting all data stored on the equipment due for disposal in line with policies in place in departments, across QMUL as a whole or in line with contractual obligations as appropriate. When in doubt, the most stringent policy should be applied.

3.17. Regardless of data being removed by the asset owners, ITS must still carry out the data removal process on all IT equipment received for disposal where appropriate, unless it is being sent to a third party for the actual data removal.

3.18. Where the IT equipment is faulty and ITS are unable to confirm the data has been removed, the IT equipment must be sent to the accredited third party for data and equipment disposal, a certificate must be provided by the company certifying that the data has been destroyed.

3.19. In the case of all disposals where the equipment leaves the ownership of QMUL, in order that QMUL discharge its obligation to comply with software licenses and copyright law. ITS shall ensure that all software (other than the original operating system and open source software) is removed, unless fully transferable software licenses including original media and documentation
are supplied with the equipment. The original operating system may only be retained if the original certificates are available to be transferred with the machine.

3.20. The QMUL hardware asset and configuration management databases must be updated when an asset has been disposed reflecting its status and location.

3.21. All removals and transfers of software licences from disposed assets shall be recorded in the appropriate QMUL licensing databases.

3.22. Organisations that have awarded Grants to purchase IT equipment that requires return, on decommissioning or transition of the project, the IT equipment must be sent to ITS to remove all data in accordance with the DG16 Disposal of Information, and uninstall applications and licences before being returned to the organisation.

3.23. Other IT equipment purchased with grant awards is to be returned to ITS to be either wiped and re-issued or disposed of as appropriate.

4. Process and Procedures

4.1. The associated processes and guidance documents can be found by visiting the ITS webpage.

5. Monitoring

5.1. It is mandatory for all policy, process and procedural documentation to comply with this IT policy and any associated procedure. Where non-compliance is identified, ITS will take appropriate action, which may result in escalation to senior management.

5.2. Checks may be made by the Risk and Governance Manager and the findings may be reported to the IT Lead Team (ITLT) in the first instance for corrective actions to be issued.

5.3. The AD of IT Operations, in conjunction with the Risk & Governance Manager, is responsible for the monitoring, revision and updating of this document.

6. Exceptions

6.1. In the event of an exception that is not addressed by this policy. The matter will be firstly referred to the ITLT for a decision via the Assistant Director for IT Operations.

6.2. The ITLT will then make a decision or refer this to the IT Strategy Board (ITSB) for guidance.

7. References

SOP DG16 – Disposal of Information
## 8. Definitions

<table>
<thead>
<tr>
<th>Term</th>
<th>Meaning</th>
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<tr>
<td>WEEE</td>
<td>the European Community directive 2012/19/EU waste electrical and electronic equipment (WEEE) sets collection, recycling and recovery targets for all types of electrical goods and imposes a responsibility for the disposal of waste electrical and electronic equipment on the manufacturers of such equipment.</td>
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<tr>
<td>ITS</td>
<td>IT Services, department within Queen Mary University of London</td>
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<tr>
<td>ITLT</td>
<td>IT Lead Team – Team of Senior Managers consisting of the Assistant Directors of IT, Faculty Relationship Managers and Chaired by the IT Director.</td>
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<tr>
<td>Manually Deleting Data</td>
<td>Deleting data and emptying the recycle bin, where possible activating the factory reset function to delete data</td>
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<tr>
<td>Asset Owner</td>
<td>The person the IT Equipment had been assigned to and is being used by or the organisation that bought the IT equipment.</td>
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<tr>
<td>Asset Controller</td>
<td>The admin team or individual who is responsible for assigning and collecting IT equipment for their team or dept.</td>
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<tr>
<td>End User Devices</td>
<td>Laptops, PC, MAC, Tablets, Smartphones irrespective of operating system that may have QMUL data stored on the device</td>
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<tr>
<td>Infrastructure Equipment</td>
<td>Servers, Storage and other devices that may have QMUL data stored on the device</td>
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<tr>
<td>Hazardous IT Equipment</td>
<td>Cathode ray tube (CRT) monitors are classed as hazardous waste and their storage and disposal is governed by the Hazardous Waste Regulations 2005. Disposals of this class of College IT asset must fully comply with the terms of these regulations</td>
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