



ICT Disposal Procedure Guidance

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“Learning together; to be the best we can be”

Context

The Data Protection Act 1998 (the DPA) is based around eight principles of 'good information handling'. These give people specific rights in relation to their personal information and place certain obligations on those organisations that are responsible for processing it.

This is relevant in the IT asset destruction and recycling processes.

For further reference please see the following linked document;

https://ico.org.uk/media/for-organisations/documents/1570/it_asset_disposal_for_organisations.pdf

Scope

- This policy relates to all schools and settings across Nexus MAT and supersedes any local policies and procedures that have been in use prior to the academy conversion. Where required, an individual Nexus MAT academy – in agreement with the Trust Chief Executive Officer - may publish a supplementary policy guidance document or procedure in line with this policy, to ensure that any idiosyncrasies associated with that specific school are covered in their local policy library.

School/Academy and Trust Obligations

The ICO states the following in relation to ICT assets and there disposal.

You should:

- Ensure that the responsibility of asset disposal is assigned to a member of your staff with a suitable level of authority;
- Complete a full inventory of all equipment that you have marked for disposal;
- Be clear about what will happen with devices when you no longer need them;
- Consider the security vulnerabilities associated with each method of disposal;
- Ensure you delete personal data before recycling devices, so that data is not accessible to others after the device has left your ownership;

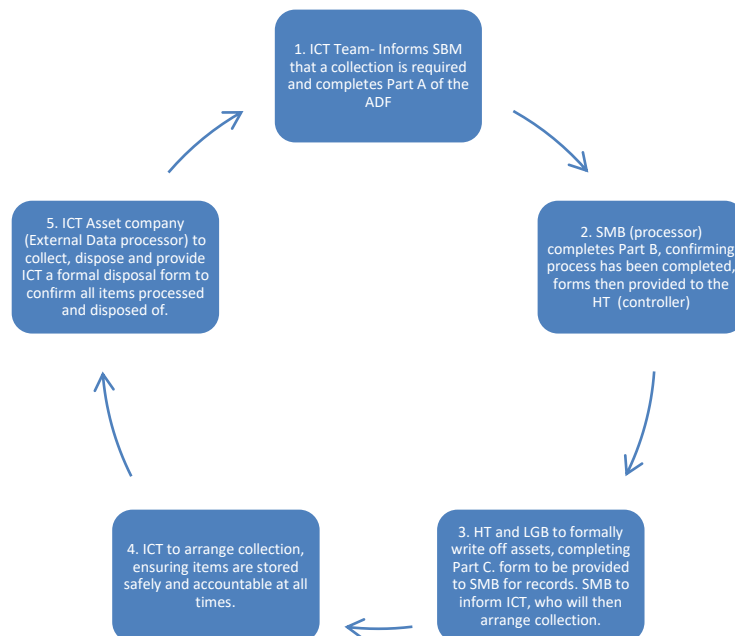
- Be aware that any specialist service provider you use will be considered to be a 'data processor' under the DPA; and
- Have a written contract in place between you and the data processor, ensuring that there is an appropriate level of security in place.

Roles

At School/Academy level the Processor (SBM) follows or delegates the internal disposal process, as set, or agreed by the Controller (Head Teacher). The School/Academy then commissions a third party Asset disposal company who operates as the external Data Processor. Ecosystems retail LTD (Reg no: CBDU129077) has been selected as our Chosen external data processor for ICT asset disposals.

Process

Terms – ADF (asset disposal form), Controller and Processor (See "roles")



Notes:

1. Items should be beyond economical repair, Deemed as obsolete or PAT failed. Hard drives must be left in devices to ensure the Disposal Company can conduct their process in full. All sections of Part A should be completed in full.
2. As assets processor, the SMB should receive the form with Part A filled in and provide to the HT only when they are satisfied Part A is completed and justified.
3. HT to present the form with Part A and Part B filled in fully to the LGB to confirm they are satisfied with the justification and the process had been followed. HT and LGB representative to fill in Part C and provide to the SBM. ICT should then be provided the completed form with approval to engage the disposal process.
4. ICT will then contact the disposals company to arrange a suitable collection date, ensuring the Items are stored securely and are fully accountable at the time of collection. The collection company may wish to know the amount and type of equipment they are picking up.
5. ICT to receive a formal disposal letter on completion; this should be provided to the schools SBM for Asset records. The ICT inventory should be updated.

ICT Asset disposal form

Part A – to be filled in by ICT, on behalf of the SMB (Processor)

Status Terms – BER (beyond economical repair), obsolete, PAT failed.

Data Risk – Low, Medium, High. For further info on weighting please speak to the Trusts ICT Lead (Trust Processor)

Item type – Laptop, PC, Monitor, Audio, IWB, Peripheral, Other

Item type	Brand	Model	Serial No:	Asset no:	Status	Current service age	Current approximate value £	Data risk

Part B – to be filled in by the SBM (Processor)

As nominated processor (SBM), I can confirm that the items listed in part A belong to the school and disposal is justified.

ICT will ensure all items are secure and accountable at all times pre collection.

Print name:..... Position:.....

Signature:..... Date:.....

Part C – To be filled in by the nominated controller (Head Teacher) and LGB

Controller - As nominated controller I can confirm the process has been followed and the schools assets can be released to our nominated external Data processor Ecosystems for disposal.

Print name:..... Position:.....

Signature:..... Date:.....

LGB representative - As the schools LGB representative I can confirm the process has been followed and the schools assets can be released to our nominated external Data processor Ecosystems for disposal.

Print name:..... Position:.....

Signature:..... Date:.....