

# IT Equipment Disposal Policy

## 1 Purpose

- 1.1 This document sets out the University's policy on the disposal of IT equipment and other data holding devices (including telephones).

It aims to ensure that the University complies with various pieces of legislation, including:

- the General Data Protection Regulation (GDPR) 2016, UK GDPR and Data Protection Act (DPA) 2018
- the Waste Electrical and Electronic Equipment Regulations 2013 (WEEE)
- the Environmental Protection Act 1990 Part II, section 34

- 1.2 It aims to protect both University IT equipment, other data holding devices and sensitive information from unauthorised access and use.

- 1.3 It aims to ensure that the University's recycling objectives are met.

- 1.4 It aims to ensure that the University complies with any software licence obligations that may be on the disk.

## 2 Why IT-equipment disposal is important and the consequences of non-compliance

- 2.1 The development of sophisticated data retrieval techniques mean that information previously thought to be deleted from University-owned devices can now be 'reformed' or 'undeleted'; this creates significant risks for the University, including reputational damage, failure to protect University information and personal data and enforcement action from the Information Commissioner who can impose substantial monetary penalties for breaches of the security principle of the GDPR and DPA.

- 2.2 The disposal of IT equipment therefore requires careful, professional handling to ensure that it is done securely and competently.
- 2.3 Staff may need to transfer software to another device, before equipment is disposed of; staff should contact IT Department to discuss their requirements, including re-use of software.

## 3 Scope

- 3.1 This policy applies to all staff, students and anyone who uses and/or disposes of University-owned IT equipment.
- 3.2 It applies to University-owned IT equipment and devices, including computers, servers, laptops, notebooks, iPads, tablets, mobile phones; any printers, photocopiers, and scanners with internal data storage facilities; and any external hard drives, memory sticks and any other data storing device not listed above.
- 3.3 Members of staff may also dispose of their private data bearing devices and accessories through the University's on-line store.

Users of this service should note that once items are logged for disposal neither devices nor data on them can be retrieved. Users should assume that both will be securely destroyed. It is the responsibility of users to ensure any required data is retained prior to disposal. The University will not be held liable for the loss of any data, or any device, once submitted for disposal.

## 4 Policy statements

- 4.1 When University-owned data holding equipment is no longer required it must be securely disposed of in line with current disposal procedures (as detailed in 4.3). For non-data holding equipment (for example accessories such as monitors or keyboards), consideration should be given as to whether it can be re-used in accordance with the University's current re-use policies and procedures.

In line with the University's Bring Your Own Device Policy, personally owned devices which have been used for University work must have University data removed prior to their disposal or transfer. Staff and students may opt to dispose of personal devices used in this way via the University's online store if they wish (see section 4.3).

- 4.2 University-owned IT equipment must not be sold or given to any member of staff, student or third party. This includes equipment bought with research grants.
- 4.3 University-owned IT equipment must only be disposed of via the University's contracted company for the disposal of IT equipment. This ensures that data holding components are securely destroyed to limit the risk of unauthorized access to data. For most devices, disposal is arranged by completing a [disposal](#)

[request form](#). For further advice on disposal procedures contact [waste@reading.ac.uk](mailto:waste@reading.ac.uk).

- 4.4 Staff who have used personally owned devices for University work can choose to dispose of IT equipment and data holding devices through the [University's online store](#). The device must be taken by staff to the secure collection point and it will then be disposed of. The University's contracted IT disposal company will securely destroy data holding components and dispose of the equipment to the same standard as for University owned items. Staff remain responsible for the security of their item(s) whilst it is in their possession.
- 4.5 All data holding equipment awaiting disposal must be stored securely by staff. Items collected through the disposal request process must be kept in a restricted access, locked and alarmed, storage facility whilst pending final collection and removal off-site by the University's contracted IT disposal company.

| Version | Keeper   | Reviewed        | Approved by | Approval date |
|---------|--|-----------------|-------------|---------------|
| 1.0     | Environmental & Sustainability Manager         | Every two years | ISWG        | 26/03/15      |
| 1.1     | Sustainability Officer/Data Protection Officer | Every two years | ISG         | 18/07/17      |
| 1.2     | Sustainability Officer/Data Protection Officer | Every two years | ISG         | 09/12/2019    |