

# IT Equipment Disposal Policy

## 1. Purpose and scope

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

This Policy is in place 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 (WEEE) Regulations 2013 (as amended)
- the Environmental Protection Act 1990 Part II, section 34

The Policy also aims to ensure that:

- 1.2 The University protects University IT equipment, other data holding devices and sensitive information from unauthorised access and use.
- 1.3 The University's re-use and recycling objectives are met.
- 1.4 The University complies with any software licence obligations.
- 1.5 The University can maintain accurate records of University IT assets.

## 2. Definitions

**University-owned and/or managed IT equipment** - includes equipment bought using a University budget. This includes equipment bought on research grants, Personal Development Allowances and Staff Development Accounts.

**Data Holding Device (s)** – includes computers, servers, laptops, notebooks, iPads, tablets, mobile phones; any printers, photocopiers, and any other devices with internal data storage facilities; and any external hard drives, memory sticks.

**Peripherals** – includes keyboards, mice, charging cables, monitors, laptop stands and risers

### **3. Why procedures for managing IT-equipment disposal are important and the consequences of non-compliance**

- 3.1 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 risks to persons to whom data relates, reputational damage, and regulatory enforcement action which can amount to substantial monetary penalties for breaches of the security principle of the GDPR and DPA.
- 3.2 The disposal of IT equipment therefore requires careful, professional handling to ensure that it is done securely and competently.
- 3.3 Staff may need to transfer software to another device before equipment is disposed of; staff should contact DTS to discuss their requirements, including re- use of software.
- 3.4 Internal re-use of IT equipment can bring benefits to the University in terms of sustainability and best use of resources. However, the University needs to ensure that the locations and users of University assets are monitored and recorded. Some assets may be unsuitable for re-issue or re-use due to factors such as the age and/or performance of the device and/or the resources required to maintain and update aged devices.

### **4. Scope**

- 4.1 This policy applies to all staff, students and anyone who uses and/or disposes of University-owned and/or managed IT equipment.
- 4.2 It applies to University-owned and/or managed Data Holding Devices and any other data storing device not listed above.

### **5. Requirements and Key Principles**

- 5.1 Where possible and appropriate, consideration will be given to whether IT equipment can be re-used internally, prior to sending externally for disposal. All devices must be wiped and re-imaged by DTS before being re-used internally. Please reference the Device Policy for more information on the reuse of devices including when staff leave the University.
- 5.2 When a University-owned and/or managed Data Holding Device is no longer required it must be securely disposed of in line with current disposal procedures (as detailed in 5.4). For *non*-data holding devices (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 Policy.
- 5.3 University-owned and/or managed IT equipment must not be sold or given away to third parties. University-owned and/or managed IT equipment, capable of holding University data (such as laptops, desktops, hard drives, mobiles and USB's), must not be given to any member of staff, student or third party without prior approval from DTS. This includes equipment bought with research grants. Peripheral IT

items, which are not capable of holding University data, such as keyboards, mice, charging cables, monitors, laptop stands and risers, can be shared and reused within the University without prior approval.

- 5.4 University-owned and/or managed IT equipment must only be disposed of via the IT Equipment Reuse & Recycle Service operated by DTS, which runs in conjunction with the University's contracted company for the disposal of IT equipment. This ensures that data holding components are securely wiped to limit the risk of unauthorized access to data. For most devices, disposal is arranged by contacting the DTS Device Lifecycle Team and completing a collection request form. For further advice on disposal procedures contact [device-lifecycle-dts@reading.ac.uk](mailto:device-lifecycle-dts@reading.ac.uk).
- 5.5 All University Data Holding Devices awaiting collection must be stored securely by staff.
- 5.6 Users of the Reuse & Recycle Service for University owned and/or managed devices should note that once items are sent for disposal neither devices nor data on them can be retrieved. It is the responsibility of users to ensure any required data is retained/moved prior to device disposal.
- 5.7 Storage of University information on personal devices should be avoided wherever possible and where unavoidable, only done where this is in line with the University Bring Your Own Device Policy. Personally owned devices which have been used for University work must have all University data securely removed prior to their disposal or transfer. Advice can be found on the Information Commissioner's Office website at <https://ico.org.uk/your-data-matters/online/deleting-your-data-from-computers-laptops-and-other-devices/>. The University retains overall responsibility for the secure removal of University data and risks that present if this is not done, however, compromises of University information as a result of unsatisfactory data removal on a personal device may constitute a breach of University Information Compliance Policies – for this reason we would recommend the avoidance of storing data on personal devices and seeking advice if you are unsure.
- 5.8 Advice on handover of University information prior to leaving the University can be found here <https://www.reading.ac.uk/imps/data-protection/leaving-the-university>.
- 5.9 Suspected or actual compromises of University data must be reported to IMPS immediately at [imps@reading.ac.uk](mailto:imps@reading.ac.uk) 0118 378 8981.

## 6. Where to go to for advice

DTS [it@reading.ac.uk](mailto:it@reading.ac.uk) 0118 378 6262

IMPS Information governance, records management and data protection

[imps@reading.ac.uk](mailto:imps@reading.ac.uk) 0118 378 8981

## 7. Related policies, procedures, guidelines or regulations

Key related policies and rules:

- Information Security Policy
- Data Protection Policy.
- Bring Your Own Device Policy
- Device Policy

Related Information Security Policies can be found at:

<http://www.reading.ac.uk/internal/imps/policiesdocs/imps-policies.aspx>

### Policies superseded by this policy

IT Equipment Disposal Policy V2.0

Version	Keeper	Reviewed	Approved by	Approval date
1.0	Environmental & Sustainability Manager	Every two years	ISWG	26/03/2015
1.1	Sustainability Officer/Data Protection Officer	Every two years	ISG	18/07/2017
1.2	Sustainability Officer/Data Protection Officer	Every two years	ISG	09/12/2019
2.0	Sustainability Services/IMPS	Every two years	(C) ISG	17/05/2022
3.0	DTS/IMPS	Every two years	CISG	02/12/2024

