Policy on Reuse & Recycling of Computers and other Electronic Equipment (v2) 2005

This document provides guidance on University Policy relating to the reuse & recycling of IT and other electrical and electronic equipment but focuses mainly on IT equipment. It ensures that the University:

1. Complies with obligations under European & UK Environmental Legislation;
2. Fulfils its commitment to the University Waste Reduction and Sustainability Policies;
3. Meets software license obligations; and
4. Reduces risk of sensitive data being released to unauthorised persons.

The University and its employees are obliged under several EU Directives, including the Landfill Directive[1] , the Waste Electronic & Electrical Equipment Directive[2] (WEEE) and the Hazardous Waste Directive[3] , **to ensure that final disposal of all Waste Electronic and Electrical Equipment is responsible and traceable**. In order to meet this obligation, **it is the responsibility of all Schools / Units to follow the procedures outlined in this document both when initially purchasing electronic equipment and when disposing of such items**.

The University Court approved the **Policy on Reuse & Recycling of Computers and other Electronic Equipment v1** in October 2004 and this update was approved by SEAG and CMG in 2005.

1. Register of New / Existing Electronic Equipment

All administrative units are required to establish proper asset management policies for recording items of equipment valued over £25,000 (see Finance Manual Sections 4.2.9 & 4.2.10 for more information http://www.finance.ed.ac.uk/manual/chapter_4_2.html).

Due to compliance risks associated with inappropriate disposal of electronic equipment, the University requires items – such as desktop PCs, laptops etc with data holding capacity – to be recorded in an appropriate "**Computers / Electronic Equipment Register**" when purchased. This is primarily to record ownership, and any transfer thereof, of equipment in order to assist with the traceability of the equipment through the stages of its lifetime and final disposal. **It is the responsibility of Schools / Units to set up and maintain their own Register.**

---

[1] The Landfill Directive (1999/31/EC) was implemented in Scotland through the Landfill (Scotland) Regulations 2003 and provides a system for the classification and management of landfill sites.
[2] The WEEE Directive COM (2000) 347 was implemented in Scotland in August 2004, with the main thrust aimed at the "producers" of the equipment.
[3] Hazardous Waste Directive (Directive 91/689/EEC) was implemented in Scotland via the Special Waste (1996) Regulations and presents a regime to control and track the movement of hazardous waste.

2. Reuse of Surplus Equipment within University or at home

If unwanted computers and other electronic equipment are still useable, Schools or other administrative units should follow a general policy of internal cascading of surplus equipment within their own Planning Unit.

Equipment that cannot be utilised locally may be advertised via appropriate email groups /publications (BITS, etc) or via Equipment Exchange at: http://www.pps.ed.ac.uk/for/equipmentexchange/index.htm.

If no immediate use can be found within the University, then the equipment may be loaned to staff – for work on University business at home. In this way ownership and responsibility – including for all aspects of software licensing, data protection and eventual disposal – remain with the University.

Any equipment transferred under this arrangement – to another School or admin unit, or to an individual for University use at home – **must be recorded out on the disposing and / receiving admin unit's Computers / Electronic Equipment Register**.

3. Disposal to Another (Authorised) Organisation for Reuse

If a use cannot be found within the University and equipment is still functioning – even if judged obsolete for University use – then it may be donated to an appropriate authorised organisation in order to University of Edinburgh Policy on Reuse & Recycling of Computers and other Electronic Equipment v2 2005 refurbish it for re-use. This route may only be used where both data and any University-owned or licensed software has been completely and systematically erased from the equipment's memory. **Authorised refurbish / reuse organisations are managed by the University's Authorised Contractor** (see below). No other route is currently authorised by the University.

Computing Services have prepared a special "Decommissioning" application – which must be used by any unit to carry out this process. It is in the suite of facilities available for Computing Officers called "PIE - Pre-Installation Environment". Please go to: http://custard.ucs.ed.ac.uk/pie-1.0/doc/Decommission.html and follow instructions for comprehensive over-writing of all sectors of the hard drive making it impossible for any software or sensitive personal or other data to be illicitly "recovered" from a discarded PC. The PIE tool also enables a simple operating system to be mounted onto the PC / laptop to enable its future use by others.

The final disposal route for all items must be recorded in the Register.

4. Disposal for Recycling

Computers MUST never be disposed of through other General Waste routes. It is illegal to mix computer waste with General Waste or to landfill untreated computer waste.

University computers must also NEVER be sold to staff or any other individual or organisation. If no use can be found within the University for unwanted equipment, or it is no longer functioning, it should be disposed of under the Agreement with the University's Authorised Contractor (see below).

The final disposal route for all items must be recorded in the Register.

5. Authorised Contractor

Until June 2006, and in cases where no procurement "take-back" scheme has been negotiated, Computer Components (North) Ltd (CCL) is the University's ONLY authorised contractor for redundant IT equipment. This company has undertaken to remove all redundant Electrical and Electronic Equipment from the University for a nominal fee. Depending on the state of the equipment, they will either give the equipment to an authorised charity for refurbishment or they will break items down to base materials for recycling. **In all cases, hard drives are destroyed and certificates of destruction can be provided on prior request.**

Computing Officers or Administrators in Schools / Units must contact the authorised contractor directly using the Request for Collection of IT Equipment for Recycling form available from the Energy & Sustainability Office website. Schools / Units may be recharged for this service in the future.

After June 2006, where new IT equipment is procured using authorised suppliers, "take-back" schemes should be negotiated and followed in order to assure a final disposal route is costed and provided for redundant equipment.

6. Further Information

For more details and copies of the CCL (North) Ltd Agreement 2005, a Request for Collection of IT Equipment For Recycling form or a sample Computers / Electronic Equipment Register, see the Energy & Sustainability Office website: http://www.eso.ed.ac.uk/PoliciesAndReports or contact Fleur Rothwell on 651 4287 or by email: Fleur.Rothwell@ed.ac.uk.

Last Updated October 2005

Policy on Reuse & Recycling of Computers and other Electronic Equipment v2 2005