Leamington Community Primary School

Together we make a Difference

ICT Disposal Policy

Completed by: Mrs. A. Belger

Courage
Determination
Friendship
Honesty
Respect

The purpose of this policy is to ensure that all ICT equipment and data storage devices at Leamington Community Primary School are disposed of in a secure, environmentally responsible, and legally compliant manner. This includes protecting sensitive information and complying with data protection laws such as the UK GDPR and Waste Electrical and Electronic Equipment (WEEE) regulations.

This policy applies to all staff, governors, and contractors involved in the management or disposal of:
- Computers (desktops, laptops)
- Servers
- Mobile devices (e.g., iPads, smartphones)
- Network hardware (e.g., switches, routers)
- Printers and copiers
- External hard drives, USB sticks, CDs/DVDs
- Any device capable of storing data

Principles

All data and IT equipment must be securely destroyed by an allocated, certified company that provides appropriate documentation and certificates of destruction. The disposal process must fully comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Waste Electrical and Electronic Equipment (WEEE) regulations to ensure that both data protection and environmental obligations are met. Before any disposal takes place, authorisation must be obtained from the Headteacher, who is responsible for ensuring that all data-bearing devices—such as computers, tablets, servers, or storage media—are appropriately wiped, destroyed, or transferred in a secure and traceable manner. Wherever feasible, equipment should be reused or recycled to support environmental sustainability, provided that all data has been completely removed in line with recognised data sanitisation standards. Full records of disposals, including dates, serial numbers, and certificates, must be retained by the school for audit and compliance purposes.

Data Security

Before disposal, all devices capable of storing data must undergo one of the following:

- **Data wiping** using certified software (e.g., DBAN or equivalent)

- **Physical destruction** (e.g., shredding, degaussing, or crushing)

- **Secure disposal** via a certified IT asset disposal (ITAD) provider

All data-bearing devices must be logged and signed off once data has been destroyed.

Disposal Process
Step 1: Inventory & Identification
- Equipment marked as "End of Life" or "To Be Disposed"

Step 2: Data Erasure
- All data erased securely using approved methods

- Certificate of data destruction obtained (where using third parties)

Step 3: Authorisation
- Approval from Headteacher or Computing Subject Leader required

- Review of whether the item can be reused internally, donated, or recycled

Step 4: Physical Disposal
- Disposal through:

    o Licensed IT asset disposal company

    o Recycling via local authority

- No equipment should be disposed of in general waste

Roles and Responsibilities

Role	Responsibility
Computing Subject Leader	Oversees disposal process, ensures data is erased securely
Headteacher	Final authorisation for disposal, ensures compliance
All Staff	Report obsolete/broken ICT equipment for secure handling
Third-Party ITAD	Provides certified, secure disposal services and documentation

Environmental Responsibility

Leamington Community Primary School is committed to reducing electronic waste. Where safe and possible:
- Equipment will be reused within the school

- Suitable devices may be donated to charities or other educational institutions

- All recycling will follow WEEE and environmental regulations

Policy Compliance

Failure to follow this policy may result in disciplinary action and may be a breach of data protection law.

Policy Review

This policy will be reviewed every **2 years** or sooner if legislation changes or following a significant ICT upgrade or incident.