



ICT Disposal Policy

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

1. Purpose

- 1.1. The purpose of this policy is to ensure there is a clear process across the MAT for the disposal of ICT, which ensures the Trust meets the legal duties on it as per the Academy Trusts Handbook and Data Protection Act (2018).

2. Context

- 2.1. Section 3.8.1 of the Academies Financial Handbook refers to the Acquisition and disposal of fixed assets... 'Other than land, buildings and heritage assets, trusts can dispose of any other fixed asset without ESFA's prior approval. Trusts must ensure that any disposal achieves the best price that can reasonably be obtained, and maintains the principles of regularity, propriety and value for money. This can involve public sale where assets have a residual value'.
- 2.2. This policy should be read in conjunction with the Write Off & Disposals Policy. If the value of the ICT is £2,000 or more and therefore on the asset register, please follow the Trust write off and disposals policy.
- 2.3. If an Academy wants to dispose of ICT, the Disposal Form, **not an NF7 as that is Fixed asset disposal. Appendix C** must be fully completed as per the guidance.

3. Disposal of ICT

- 3.1. The Data Protection Act (2018) stipulates that any business (including Multi Academy Trusts) that falls victim to a data breach only has 72 hours to report it, and if they are found to be in breach of the guidelines, they could be fined 4% of the business' annual turnover or £20 million (whichever is greater).
- 3.2. Clearly it's crucial that Nexus MAT is fully compliant with the law and the way in which we handle and dispose of personal information. The Data Protection Act) 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 ICT asset disposal 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

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

3.4. 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.

Appendix A ICT Disposal Procedure

Roles

At School/Academy level, the ICT Processor (School Business/Office Manager) follows or delegates the internal disposal process, as set, or agreed by the Controller (Headteacher).

For ICT asset disposals, 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

1. Asset processor (SBM) ensures that the **ICT Disposal Form** is completed in full. As asset processor, the ICT processor should only pass the Asset Disposal Form to the Headteacher for signature when they are fully satisfied that Part A is completed correctly and the disposal is justified.
2. Any assets requiring disposal should be categorised as: Beyond Economical Repair (BER), deemed as Obsolete (O) or PAT Failed (PF).
3. 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.
4. For ICT disposals, the ICT engineer in the academy will then contact the disposals company to arrange a suitable collection date, ensuring the Assets are stored securely and are fully accountable at the time of collection.

Note: the collection company may wish to know the amount and type of equipment they are collecting. ICT engineers 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.

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

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

Part C – To be filled in by the nominated controller (Headteacher)

Controller: As nominated controller, I can confirm the Trust's Asset Disposal process has been followed and the academy ICT can be released.

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

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