



*Computer Recycling - kept simple, kept secure*

**ACCREDITATION MANUAL**

**FOR**

**MEMBERSHIP OF THE**

**REGIONAL ELECTRONICS INITIATIVE**

(A company limited by guarantee)

***Ammended May 2009***

*Registered Office: The Active Centre, Stansfield Road, Airedale, Castleford, WF10 3UA*

*Registered Company Number: 6694833*

*Directors: Keith Sorrell, John Cawley & Shaun Nicholson*

*[www.REI-North.net](http://www.REI-North.net)*

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## 1. INTRODUCTION

This document provides new and existing members of the REI with guidance on achieving legal compliance in all aspects of computer refurbishment, including:

- ◆ Taking ownership of equipment
- ◆ Description of goods
- ◆ Data protection
- ◆ Software installation
- ◆ Waste management
- ◆ Health and safety.

The purpose of this document is to set out the requirements for membership of the REI and provide guidance for recyclers and refurbishers of Waste Electrical and Electronic Equipment (WEEE) working towards REI accreditation.

## 2. TAKING OWNERSHIP OF EQUIPMENT

It is necessary for centres to take ownership of all goods donated to ensure that:

- ◆ All liability for data security and safety of the equipment is taken from the donor to the centre
- ◆ The centre is able to sell the equipment, dismantle it or dispose of it as waste
- ◆ All revenue generated from the sale of the components and equipment is the centres and not the donor's.

Receipts or transfer notes must be issued to the donor for each individual donation stating that the centre has taken ownership of the equipment. Centres may also wish to include information regarding what will happen to the equipment (such as data removal methods, refurbishment, recycling, etc) - a donor pledge rather than a simple receipt.

**Remove all distinguishing marks from equipment to ensure that:**

- ◆ The equipment cannot be traced back to the donor organisation
- ◆ Donor confidentiality is assured
- ◆ The equipment is identified as no longer belonging to the donor.

**Marks can be removed by the following techniques:**

- ◆ Chemical cleaning
- ◆ Chiselling or grinding
- ◆ Covering with stickers
- ◆ Replacing the casing.

### 3. DATA PROTECTION

**With regards to the wiping of hard disks, REI centres must demonstrate that they are honouring the requirements of the Data Protection Act 1998:**

- ◆ To treat as confidential all data obtained in the course of or in connection with donations of computing equipment
- ◆ To use appropriate methods to securely destroy all data and copies of data stored on the computing equipment
- ◆ To notify the donor organisation as soon as possible if any unauthorised use or disclosure is made
- ◆ To comply with data security obligations equivalent to those imposed on a data controller by the seventh principle of the Data Protection Act 1998, namely the putting into place of appropriate technical and organisational measures.

**To achieve these requirements, REI centres must do the following:**

- ◆ Sanitise all working hard disks to blank the file allocation table
- ◆ Disable hard disks that are assessed as waste, before sending them to an authorised contractor for reprocessing
- ◆ Provide a certificate of erasure or destruction of the hard disk to donor organisations on request
- ◆ Allow security procedures to be visually inspected by donor organisations and REI directors on request.

Electronic data must be eradicated so that they cannot be retrieved through the keyboard. Data eradication should, as a minimum, meet the baseline standards set by the government's Communications - Electronics Security Group (CESG). This is set out in Memorandum No.7 'Re-use or disposal of protectively marked computer storage media' issue 3.0 Feb 2001.

**The CESG document is available from:**

Communications - Electronics Security Group,  
PO Box 144, Cheltenham, Glos, GL52 5UE

Tel: 01242 237323

Fax: 01242 257520

Email: [enquiries@cesg.gov.uk](mailto:enquiries@cesg.gov.uk)

Web: [www.cesg.gov.uk](http://www.cesg.gov.uk)

**To achieve CESG baseline and enhanced standards, centres must use a suitable sanitizing application**

Using Fdisk and Format alone is **not** sufficient for meeting REI Accreditation. This method has inherent limitations, as only the file allocation tables and the pointers to the data (that render the data inaccessible) are destroyed. However, data on the remainder of the drive is not destroyed and the inaccessible data is easily retrievable. Also, Fdisk does not have access to the entire physical hard drive.

## 4. SOFTWARE INSTALLATION

It is a legal requirement for centres only to supply properly licensed software on refurbished equipment.

## 5. WASTE MANAGEMENT

**This section outlines the legal requirements for REI centres in relation to:**

- ◆ The handling of donor organisations' IT equipment
- ◆ The responsible management of the centres' own waste material that results from the refurbishment process.

### **The handling of donor organisations' waste.**

A key issue to address immediately is whether REI centres are handling material that is legally defined as "waste", as organisations handling "waste" have many more legal obligations than those that are not.

**The current interpretation is that REI Centres are not handling waste as long as they are able to demonstrate that:**

- ◆ They are only knowingly collecting computers and allied equipment that are suitable for the purposes of refurbishing and cannibalising for sale
- ◆ All equipment coming into the centre is assessed for reuse

### **It is important to make the distinction between reuse and recycling.**

Reuse equipment means that you intend it to be used again for its original purpose (e.g. an old computer will be given a new life as a working computer).

Recycling essentially means breaking it up and reprocessing it - such as for scrap metal or plastic. Materials that are to be recycled are defined in law as "waste".

### **Waste carriers and brokers licences.**

All centres must contact the Environment Agency (EA) and, based on the nature of its business, apply for both a waste carrier's licence and/or a waste broker's licence. Although a centre may take the stance that all of the items they collect are intended for refurbishment (and thus not waste), having a waste carrier's licence gives the centre the option of collecting waste from donor organisations. It also provides reassurance to donor organisations and the Environment Agency, if they disagree with the centre's stance.

In addition, centres are acting as waste brokers if they transport non-refurbishable equipment direct from a donor to a waste contractor, or collect a donation on behalf of a third party. To contact the Agency, ring 0845 9333111 and ask for their local office.

**Copies of these licences should be kept in Centres' vehicles at all times.**

### **Apply for an exemption from waste management licensing.**

Centres must also request an exemption from waste management licensing for the activities carried out on their premises. The EA should grant an exemption as long as centres are able to demonstrate the criteria laid down in paragraph 40 of the permitting regulations. Note that by obtaining this exemption, a centre is an *authorised waste* management facility, even if not a *licensed* facility.

### **Where required, complete and retain copies of Waste Consignment Notes for any waste that is collected from donor organisations above the 500kg limit.**

#### **REI waste.**

REI centres, in their day-to-day activities, produce wastes. These might include office-type waste, unusable bits of computers sent for recycling and unusable items collected directly from donor organisations.

#### **The Duty of Care for Waste.**

The Environmental Protection Act 1990 (as amended) introduced the Duty of Care, which requires all waste producers to ensure that all their waste is stored and disposed of responsibly, and that it is only handled or dealt with by individuals or companies that are authorised to deal with it.

#### **The Duty of Care applies to all REI centres and its main implications for centres relate to:**

- ◆ The storage of waste
- ◆ The sending of centres' waste materials to authorised persons
- ◆ Record keeping through a system of signed waste transfer notes
- ◆ Post-contractor audits
- ◆ Staff training.

#### **The storage of waste.**

Centres should ensure that all waste is stored securely, kept in suitable labelled containers at all times in order to prevent any escape, and ensure the correct segregation of waste types.

#### **Use of authorised persons.**

The "authorised persons" to whom REI Centres can recycle or dispose of their IT equipment waste are contractors that have a waste management licence or exemption certificate to transport or dispose of this kind of material.

**Centres must request copies of appropriate current licenses from each of their contractors, which could include:**

- ◆ Waste carriers
- ◆ Waste broker
- ◆ Waste disposal
- ◆ Hazardous waste
- ◆ Exemptions.

**The directors of the REI will vet regional waste contractors prior to granting authorisation and publishing their contact details on the website**

### **Local scrap metal dealers**

In addition to dedicated IT waste contractors, REI centres often send material to local scrap metal dealers to manage this element of their IT waste stream. REI centres must ensure that these dealers are in receipt of relevant waste licences.

### **Waste transfer notes**

The Duty of Care requires that Centres ensure that a record is kept of all waste received or transferred to authorised contractors through a system of signed waste transfer notes (WTNs).

These are required for wastes collected by the centres from donor organisations, as well as for wastes produced by the centres themselves. Other than where a 'season ticket' is used (see below), a WTN must be created for each load of waste. It is common practice for the collector of a waste to provide the duplicate copies of each WTN. Both parties must sign both copies, and each party must keep all WTNs for a minimum of two years.

**All transfer notes should contain enough information for the wastes to be handled safely and within the law. The main information that appears on a WTN should include:**

- ◆ An accurate description of the waste
- ◆ The quantity of the waste
- ◆ The type of containers that waste is in
- ◆ The names and addresses of both parties
- ◆ The location of the waste transfer
- ◆ All wastes that arise irregularly.
- ◆ Details of the authorisation of the waste carrier
- ◆ The European Waste Catalogue (EWC) code for each waste.

### **Staff training**

Centres should ensure that all employees and contractors working on their premises are given specific instructions relating to how each and every waste that might arise is to be handled and disposed of.

## **Hazardous waste**

Regulations covering Hazardous Waste will require all producers of hazardous waste to be registered with the Environment Agency.

### **The definition of Hazardous Waste will be based on the European Waste Catalogue. Wastes classified as Hazardous include:**

- ◆ Transformers and capacitors containing PCBs
- ◆ Discarded equipment containing or contaminated by PCBs
- ◆ Discarded equipment containing hazardous components
- ◆ Hazardous components removed from discarded equipment
- ◆ Nickel-cadmium batteries
- ◆ Batteries containing mercury.

The Environment Agency produces guidance on which wastes will be defined as Hazardous, and what producers of Hazardous Waste will have to do.

### **Types of waste collected by or produced by centres is likely to be hazardous waste and have the potential to cause particular harm to health or the environment and they include:**

- ◆ Monitors which contain phosphor, arsenic, strontium and lead in the CRT
- ◆ Transformers and capacitors containing PCB's or PCT's
- ◆ Batteries that contain quantities of lead, cadmium and mercury.

Further guidance on whether a particular waste from a centre is hazardous or not is available from the Environment Agency.

### **Hazardous Waste needs special management and is more closely regulated than regular wastes, in that:**

- ◆ The organisation collecting Hazardous Waste needs to be authorised by the Environment Agency
- ◆ Each collection of Hazardous Waste has to have a multiple-part "consignment note" completed and sent to the Environment Agency.

As explained earlier, the items collected by centres are only defined as "waste" if the centre does not intend to refurbish them.

### **Recyclers must be licensed with the relevant authority according to the type of processes operated.**

Refurbishers must ensure that any equipment or components, which cannot be refurbished, are recycled and disposed of in accordance with Environment Agency regulations and must only send their waste material to licenced contractors.

## 6. HEALTH AND SAFETY

The Health and Safety at Work Act 1974 places a duty on employers of more than five people to have a written policy statement. With this in mind, a recommended health & safety policy statement has been prepared for REI centres. This is presented as a download from the REI website [www.regionalelectronicsinitiative.org](http://www.regionalelectronicsinitiative.org)

The policy statement is based on guidance issued by the Health and Safety Executive in their leaflet *Stating Your Business - guidance on preparing a health and safety policy document for small firms*. The recommended policy has been tailored specifically for computer refurbishment centres. For further information, REI Centres can obtain a free copy of this leaflet by contacting HSE Books on 01787 881165.

A checklist has also been produced for downloading to allow members of staff to undertake checks of Health and Safety procedures at the centres as well as assisting centres to set up these arrangements.

The policy has been designed so that each centre can customise it. However, in some areas we have been prescriptive, such as in the fire procedures, the review of risk assessments and the review of the policy itself, as these are standard requirements.

### **The key health and safety issues in small organisations include:**

- ◆ Accident prevention
- ◆ Electrical safety
- ◆ Fire prevention
- ◆ First aid
- ◆ Display of policies.

### **And in computer refurbishment centres, particular attention should be paid to:**

- ◆ Using computer cleaning fluid
- ◆ Handling electrical equipment to minimise the risk of electrocution
- ◆ PAT testing
- ◆ Mechanical disabling of hard drives
- ◆ Safe stripping of non-refurbishable equipment, particularly through the use of personal protective equipment such as gloves and safety boots
- ◆ The use of a vacuum cleaner to remove dust prior to working on a computer
- ◆ Display screen assessment
- ◆ Manual handling of computer equipment
- ◆ Stacking of equipment in the centre and its vehicles.

## **7. ADDITIONAL REQUIREMENTS FOR ACCREDITATION**

**Recyclers must have an Environmental Statement and demonstrate that they have an appropriate management system to meet their environmental objectives.**

**This should include:**

- ◆ A commitment to waste minimisation through sustainable waste management
- ◆ Provision for including environmental good practice as an element in training courses
- ◆ A policy that minimises the use of energy, water and other resources at the centre.

### **Insurance Cover**

Refurbishers are required to demonstrate adequate insurance cover for public and products liability. This will need to be a minimum of £1,000,000.

### **Disclosure of Notices and Prosecutions**

Refurbishers must give an undertaking to disclose any past (within the last five years), present or pending prosecutions in respect of any environmental or health and safety issues and demonstrate that appropriate action has been taken to rectify the situation. Any Environment Agency or Health and Safety Executive enforcement notices must also be disclosed, together with details of remedial action. Once REI accreditation has been granted, recyclers must inform the REI of any subsequent breach.

### **Permits and Permissions**

Refurbishers must maintain all permits and permissions up to date and allow these to be inspected and audited by prospective clients.

## 8. SELF-ASSESSMENT CHECKLIST

- Has a donor receipt or pledge been issued?
- Have all distinguishing marks been removed from the equipment?
- Has each working hard disk been sanitized?
- Have other hard disks been disabled before being sent to an authorised contractor?
- Are you knowingly collecting only computers and allied equipment, which are suitable for the purposes of refurbishing and cannibalising for sale?
- Is all equipment coming into the centre assessed for refurbishment?
- Is all the centre's waste sent to authorised persons?
- Do you have waste carrier and broker licences, and copies in your vehicle(s)?
- Have you registered with the EA for a waste management licence or an exemption?
- Is all waste stored according to the Duty of Care?
- Do you have copies of the waste carrier's licence, waste disposal licence or exemption certificate of each authorised contractor that you use?
- Do you ensure that no IT equipment is disposed of in the centre's general waste?
- Have you completed a waste transfer note for each consignment of waste disposed of to an authorised contractor?
- Have all monitors/batteries been sent to contractors with a Special Waste licence?
- Is training given to employees relating to the handling of waste?
- Do you test equipment to check that the hardware functions in accordance with its stated purpose?
- Are your waste contractors registered with Environment Agency?
- Are resale items PAT tested to the appropriate standard?
- Do you have a quality management system capable of providing full traceability?
- Can you provide detailed mass balance data for equipment and material processed?
- Do you have an Environmental Statement and Environmental Management System?
- Do you have a minimum insurance cover for public and products liability of £1m?
- Are you able to disclose any prosecutions in respect of any environmental or health and safety issues?
- Are all your permits and permissions up to date?
- Is only licensed software installed on refurbished equipment for resale?
- Does the description of refurbished goods properly describe their condition?

# Environmental Policy Statement

The REI is committed to protecting and enhancing the environment in which we work.

We will conform to the principles of sustainable development, recognising the ecological limits within which we must operate.

We affirm that by acting regionally, we can play our part in improving the global environment.

We will seek to integrate environmental considerations into all our decision-making and will commit to continual improvement of our environmental performance.

## Issues

In order to achieve these aims, the REI is committed to minimising its impact on the environment by establishing a programme of continuous improvement, with particular emphasis on the following:

- Ensuring that all legal requirements are met and, where possible, exceeded
- Promoting environmental management policies and practices at every level and in every department
- Avoiding, wherever practical, the use of environmentally damaging substances, materials and processes
- Minimising water use and hazardous effluent disposal
- Reducing the generation of waste through waste minimisation techniques
- Re-using or recycling wastes
- Minimising the environmental impact of transport usage in carrying out REI services to the public and private sectors
- Working towards the establishment of an Environmental Management System

## Operation

The directors of the REI will:

- Co-ordinate the organisation's environmental actions
- Promote best practice on environmental issues through established communication routes to accredited centres
- Develop an environmental strategy for the REI
- Encourage the development of competence for those with environmental responsibilities

## Reporting

The aims of this policy will be put into place by the implementation of an Environmental Management System, which will be audited on a regular basis. The environmental policy will be reviewed each year and any changes deemed appropriate will be made. The policy will be distributed to all members of staff and will be available to the public and other interested parties upon request.



John Cawley  
REI Director



John Cawley  
REI Chairman

## Quality Policy Statement

The REI is committed to ongoing high levels of quality in service delivery. Acting as a Consortium of accredited computer re-use centres, the aim is to improve service delivery further, and to enhance its positive reputation.

Delivering high-class services is of the utmost importance, with a specific emphasis on:

- Providing services in a professional and courteous way
- Delivering services to a high standard of accuracy and trust
- Meeting and exceeding customer expectations
- Providing the appropriate and correct solution at the first opportunity
- Actively seeking opportunities for continuous improvement
- Developing services further in line with requirements for ongoing quality
- Abiding by relevant legal and financial regulations
- Providing an open and stimulating working environment for staff at all levels
- Offering opportunities for staff for their further development
- Thriving on initiatives and ideas for improvement brought forward by staff
- Acting in partnership with staff, local authorities and the communities



John Cawley  
REI Director



Keith Sorrell  
REI Chairman