WASTE MANAGEMENT POLICY
Policy for the safe disposal of healthcare waste, special waste and the recycling or recovery of all other residual waste and surplus materials

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<th>Lead Manager</th>
<th>Waste Management Officer</th>
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<td>Responsible Director</td>
<td>Director of Facilities</td>
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<td>Approved By</td>
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Policy Application:

• This Policy applies to **ALL** members of staff, contractors and any other party undertaking business or providing health care services on behalf of NHS Greater Glasgow and Clyde;
• The Policy applies to all premises and sites owned or controlled by NHS Greater Glasgow and Clyde;
• The Policy applies to **ALL** wastes that arise from premises, land (owned, leased or used) through delivering NHS Greater Glasgow and Clyde healthcare services. This includes all scrap, surplus materials, assets and moveable equipment, part or whole, which are defined in law as waste;
• This Policy is to be used and read in conjunction with other NHS Greater Glasgow and Clyde policies – in particular, integrated with the Infection Prevention & Control Policy and the Health and Safety Policy.

Purpose:

• This document sets out the policy objectives, an appropriate framework for the supporting management responsibilities and organisational arrangements, in keeping with statutory and mandatory requirements.

• This document does not contain the specific details of the statutory or mandatory arrangements for waste and material management, which are to be found within Legislation and Scottish Government Health Directorates instructions and supporting guidance (see References).

RESPONSIBILITIES FOR IMPLEMENTATION

*Organisational: Chief Executive, Chief Operating Officer, Directors*  
*Departmental: Departmental / Line Mangers/ All Staff*

Policy Statement:

1. NHS Greater Glasgow and Clyde takes seriously the requirements for a structured approach on the safe management of healthcare waste (*which includes clinical waste*), special waste and the recycling or recovery of all other residual waste and surplus materials;

2. This framework ensures that health, safety, environmental and financial risks are effectively managed and integrated within the overall risk management

   A structured management approach also ensures procedures are in accordance with statutory requirements, the National Waste Strategy (Scotland), the Zero Waste Plan and mandatory NHSScotland Instructions;

3. NHS Greater Glasgow and Clyde is committed to the effective and safe management of healthcare waste, special waste and the recycling or recovery
of all other residual waste and surplus materials arising. It aims to achieve this through the development of realistic and acceptable risk based procedures, which meet the spirit and letter of the law, the performance standards and the interpretation set out in NHSScotland – Scottish Health Technical Note No 3 – NHSScotland Waste Management Guidance (SHTN 3) and associated suite of guidance;

4. NHS Greater Glasgow and Clyde recognises that the safe management and disposal of healthcare waste, special waste and the recycling or recovery of all other residual waste and surplus materials is a significant management responsibility comparable in importance to other management and performance objectives;

5. NHS Greater Glasgow and Clyde is committed to ensuring compliance with Standing Financial Instructions and all relevant statutory and mandatory requirements by undertaking, maintaining and monitoring the performance of management arrangements and mitigating the risks of the disposal of healthcare waste, special waste and the recycling or recovery of all other residual waste and surplus materials;

6. NHS Greater Glasgow and Clyde will, as far as is reasonably practicable, ensure that healthcare waste, special waste and all other residual waste and surplus materials are secure from areas of public access and properly and efficiently managed throughout, in keeping with the statutory obligations of the Duty of Care (Section 34 Scotland), as prescribed in the Environmental Protection (Duty of Care) Regulations: 1991 and all other associated waste management regulations and guidance. Where appropriate and risks are minimal, the strategy will be to reduce, re-use, recycle and recover materials and substances, to avoid unnecessary disposal;

7. NHS Greater Glasgow and Clyde recognises its responsibilities to all its employees, including agency, contract and volunteer staff, under the Health and Safety at Work etc Act: 1974 and associated regulations and will provide sufficient information, training, supervision, equipment and safe systems of work to carry out their duties in the implementation of this Policy;

8. NHS Greater Glasgow and Clyde recognises its responsibilities to ensure the safe management of healthcare waste, special waste and the recycling or recovery of all other residual waste and surplus materials arising. In order to achieve this, the highest priority will be given to:

a. Ensuring throughout that residual waste and surplus materials are kept in a secure location and safeguarded against public access, uncontrolled release, spillage or pollution;
b. Minimising the production and associated environmental impact of wastage by reviewing materials used, practices employed and the residuals arising;

c. Ensuring that healthcare waste, special waste and all other residual waste and surplus materials are properly and efficiently segregated in the workplace, presented for uplift in appropriate fit for purpose packaging, then handled, stored, transported, recycled, treated, recovered and disposed of appropriately;

d. Ensuring procedures for waste and material management are established, adopted, understood and implemented; Providing information, instruction, training, supervision and monitoring as necessary to ensure the implementation of waste and material management systems;

9. NHS Greater Glasgow and Clyde requires the assistance and co-operation of each and every employee and every health care service provider in the pursuit of this policy.

**Review:** This policy will be reviewed every 3 years. An annual accuracy check will be undertaken by the Waste Management Officer to ensure the policy is reflective of legislative and/or authoritative guidance changes.
INTRODUCTION

NHS Greater Glasgow and Clyde delivers healthcare services across a wide portfolio of settings, resulting in the production of a correspondingly broad range of healthcare waste, special waste and other residual waste and surplus materials. The presentation of suitably and safely segregated wastes and materials that require a wide range of safe disposal and recycling or recovery technologies has many associated burdens, costs and risks. The Scottish Government Health Directorates have provided NHS Boards with specific waste, material and environmental management responsibilities to be discharged and obligations to be met in the delivery of healthcare services.

NHS Greater Glasgow and Clyde is obliged to understand a wide range of statutes and legislation broadly contained within the Health and Safety at Work etc Act: 1974 framework and within the Environmental Protection Act: 1990 framework. NHS Greater Glasgow and Clyde is required to assess the risks in the context of the protection of workers engaged in or supporting healthcare delivery, in waste and material management, in the protection of the public and for the local and wider environment.

In the workplace 3 distinct types of waste and surplus materials arise:

**Healthcare waste (which includes clinical waste)** – arising directly from the delivery of healthcare by clinicians. This includes a wide range of wastes defined in legislation according to ethical issues, risk of infection and level of infectiousness, or presence of special (hazardous) waste substances by class, origins or properties – including what may be better known as clinical waste, special waste and low level radioactive waste;

**Special waste** – arising from the delivery of healthcare in both clinical and non-clinical settings. This includes a very specific range of wastes and waste substances defined in regulation according to their hazardous characteristics or components;

**All other waste and surplus materials** – arising ancillary to the delivery of healthcare in both clinical and non-clinical settings. This includes a wide range of segregated or mixed dry recyclables, organic & food waste and residual wet or mixed municipal wastes defined in legislation due to minimal risk of infectiousness or danger from hazardous substances by origins – including what may be better known as commercial waste, industrial waste, construction/demolition waste, non-hazardous waste. This can include

RESPONSIBILITIES AND PROCEDURAL FRAMEWORK

Organisational:

Chief Executive

The Chief Executive carries ultimate responsibility/accountability for waste management within the organisation. The Chief Executive will manage the Waste Management Policy through the Board Corporate Management Team and ensure clear guidelines for those tasked with compliance of legislative and statutory standards.

Corporate Management Team

The Corporate Management Team is responsible for implementing the Board’s overall Waste Management Policy including:

- Compliance with legislative and statutory standards.
- Liaising with the Director of Facilities to ensure the Board’s Waste Management Policy is understood and applied across all areas of the Board.

The Corporate Management Team will carry a governance responsibility for reviewing the performance of the Board in all matters of Waste Management. They will be advised on this by the Board’s Infection Control Committee with contributions from the Director of Facilities.

Director of Facilities

The Director of Facilities is the nominated senior officer for waste management and is responsible for developing the Board’s overall strategy response on all matters relating to waste management, for managing staff who advise on waste management matters, for monitoring performance of the Board, reviewing incidence of non compliance and for making recommendations on a Board-wide basis on any deficiencies identified. In fulfilling this responsibility the Nominated Officer will liaise with the Chief Executive, Chief Operating Officer and Directors of Partnerships.

The Chief Operating Officer, Directors and Directors of Partnerships are responsible for supporting the Director of Facilities in the development of the Board’s overall strategy in relation to waste management and for ensuring implementation within their areas of responsibility.
The Health and Safety Service Manager (Facilities and Partnerships) as Waste Management Officer for NHS GGC

Will:
Undertake the provision of waste management and annual performance reports to Chief Executive, Director of Facilities, Board Infection Control Committee

Review the implementation of the policy NHS Greater Glasgow & Clyde wide;


Ensure the availability of relevant and current training material.

Departmental:

Departmental / Line Managers are responsible for:

- Ensuring that all staff are aware of this Policy and are familiar with the relevant compliance procedures and protocol framework associated with the segregation and recycling of materials and disposal of residual wastes;

- Putting into practice, within the protocol framework, the local procedures and safe systems of work which are designed to reduce risks associated to the segregation and recycling of materials and production of waste to its final disposal;

- Ensuring that all staff and workers engaged in healthcare and in waste management have adequate information, training, instruction, supervision and support. This includes refreshing staff knowledge and skills at regular frequencies;

- Monitoring the effectiveness of local compliance procedures and safe systems of work, including annual review of occurrence recording, investigation and management inspections;

- Ensuring that local policies and procedural guidelines are developed and maintained;

- Ensuring staff receive suitable and effective support following any accidents or incidents relating to waste material management;
• Ensuring that specialist arrangements for the disposal of Medicinal Products (medicines) are co-ordinated with Pharmacy and in line with associated Policies;

• Ensuring that specialist arrangements for handling, storing and disposing of specimens and potentially infectious substances are co-ordinated with Laboratory services and in line with associated policies.

**All staff and workers engaged in healthcare and in waste management are responsible for:**

• Taking precautions and reasonable care with regard to their own safety and that of any other persons who may be affected by their actions and the environment;

• Co-operating with policy, procedures and safe systems of work that are in place to minimise risk to persons and the environment;

• Reporting of all incidents, including near misses that arise;

• keeping knowledge and skills up to date via appropriate training and instruction and ensuring practical skills are regularly refreshed;

• Assisting managers with the identification of any risks arising from waste and material management.

**PROTOCOL FRAMEWORK AND LOCAL PROCEDURAL ARRANGEMENTS FOR IMPLEMENTATION**

**Risk Based Approach**

Risk Assessment is the fundamental process used to minimise actual or potential harm to persons or the environment. Local managers must identify and assess all risks, by considering the hazards and the severity of harm.

Waste and material management is a complex area subject to Statutory Obligations under the Duty of Care Regulations. All responsible staff require to be fully aware of their Statutory duties as outlined in the pertinent Regulations and guidance. To ensure that ALL local managers are aware of these regulatory aspects, the NHS Greater Glasgow and Clyde - Waste Disposal Procedures (based on SHTN 3) provides a core generic protocol framework that supports and provides an interpretation of critical workplace requirements.

The protocol framework adopts as fundamental policy, the waste container (bags & bins) safety colour coding & labelling system, to mitigate risk (as detailed in
Local Facilities Management, supported by the Waste Management Officer, can provide additional support to local managers on the assessment of local waste and material management risks.

As a result of risk assessment all locations where waste and materials arise should have effective control measures in place to manage identified risk. The NHS Greater Glasgow and Clyde - Waste Disposal Procedures are central to the protocol framework and compilation of a risk assessment. However, all managers are responsible for developing localised arrangements specific to local needs and NHS patient locations.

**Waste and Material Management risk assessment factors:**

There are various waste management factors that need to be considered when conducting risk assessment. The waste may be considered to present a hazard and or have perceived or the potential to be of harm to persons or the environment if it demonstrates or contains:

- **Infectious or Biohazard characteristics** - with reference to Control of Substances Hazardous to Health Regulations [COSHH] with categorisation and classification of infectious substances in hazard groups. These shall be considered in line with the guidance on duties and managing the risk produced by the Advisory Committee on Dangerous Pathogens [ACDP] and Technical Guidance WM2 [Hazardous Waste] jointly produced by SEPA and EA;

- **Hazardous or dangerous substances** - Technical Guidance WM2 and HSE EH 40 and other Statutory Lists identify the following hazardous characteristics and/or thresholds for - explosive, oxidising, highly flammable, irritant, harmful, toxic, carcinogenic, corrosive, infectious, teratogenic, mutagenic, eco-toxic, produce toxic gas, or yield leachate;

- **Sharp or cutting edges** (Glass, Sharps and other intrusive devices etc);

- **Radioactive Substances**;

Offensiveness (volume, time and temperature controls). Or as a result of issues relating to:

- **Containment** (packaging, storage, handling and transport controls);

- **Definition as a “Controlled Waste”**;

- **The Duty of Care and Waste Hierarchy requirements.**
The following risk aspects of the waste, material or management regime should be considered when evaluating the hazards and likelihood of harm to persons or the environment:

- Access and egress; (e.g. to/from clinical environment, handling/storage arrangement, vehicle movements)

- Access by birds, insects or other vermin; (e.g. prevention measures)
- Accessibility to the public or third parties; (e.g. secure prevention measures)
- Fire risk; (e.g. precaution or mitigation measures and waste arrangements considered in Fire Risk Assessment)
- Fit for purpose containment; (e.g. using only the containment (bags/bins) identified in the NHS Greater Glasgow and Clyde - Waste Disposal Procedures)
- Frequency of uplift; (e.g. appropriateness and risk of contamination or infection)
- Incident reporting procedures and record keeping; (e.g. working to NHS Greater Glasgow and Clyde - Waste Disposal Procedures)
- Labelling and marking; (e.g. working to NHS Greater Glasgow and Clyde - Waste Disposal Procedures)
- Location of waste arisings and storage; (e.g. appropriateness and risk of contamination)
- Moving and handling; (e.g. appropriateness and working to NHS Greater Glasgow and Clyde - Waste Disposal Procedures) and exposure
- Patient contact; (e.g. appropriateness and risk of infection or haz)
- Patient location (e.g. appropriateness of safe storage and awareness of take back)
- Patient location (e.g. appropriateness of safe storage and awareness of take back schemes to avoid inappropriate or unsafe disposal)
- Perceptions about the waste; (e.g. working to risk mitigation - identified in NHS Greater Glasgow and Clyde Waste Disposal Procedures)
- Potential and procedures for dealing with spillage; (e.g. working to NHS Greater Glasgow and Clyde Waste Disposal Procedures)
- Presence and management of substances hazardous to health
- Presence of medicinal products (medicines);
- Presence of metal objects;
- Procedure for returning certain medicinal products to pharmacy;
- Procedure for presenting waste for uplift and disposal
- Procedures Involving Sharps/Syringe discharge;
• Procedure to avoid potential disposal of hazardous wastes and substances to drain
• Risks requiring immunisation
• Security risks
• Segregation;
• Temperature; (e.g. impact on variable temperatures and change of state or odour release.
• Staff training and experience;
• Transportation, driving and vehicle movement; (workplace transport and dangerous goods movement)
• Welfare of staff, patients and any other persons; (health and safety regulations)
• Any other risk specific to the individual's role.

Managing the Risk

The risk presented should be reduced to the lowest level that is reasonably practicable. If the risk assessment shows that it is not possible for the waste material to be safely handled, stored, decontaminated, recycled, treated or disposed of using NHS Greater Glasgow and Clyde waste Disposal Procedures, then other arrangements must be put in place in co-ordination with the Waste Management Officer. Local managers and the producer of the waste have prime responsibility for the Duty of Care, the associated Waste Hierarchy and all aspects of health, safety and environmental protection, wherever NHS Greater Glasgow and Clyde healthcare services are delivered.

Training

Regulated Statutory and Mandatory requirements lead to increased competence levels and capabilities. (e.g. such as through knowledge and skills framework [KSF])
The appropriate level of training to staff will be provided based on the needs identified through risk assessment conducted at local level. Advice and guidance on available training can be obtained from the Waste Management Officer. NHSGGC utilises the Waste Training Module on Learnpro.

Occurrence Recording

All persons and workers engaged in healthcare and in waste and material management should report all incidents including near misses. Local Managers should be informed and Datix, and any forms completed and processed as soon as possible following the incident. This will ensure compliance with the Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR): 1995. All incidents must be recorded to ensure accurate information, to enable intelligent
trend analysis, which will help with future planning for reduction target initiatives and improving safe systems of work.

**Monitoring Arrangements**

Local managers are required to monitor their local policies, the local procedural arrangements, risk register and incident analysis.

On behalf of the Director of Facilities the Waste Management Officer will provide an annual report of performance for discussion with Chief Executive, Chief Operating Officer via the Performance Review System.