# Waste Policy

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<tr>
<th>CATEGORY:</th>
<th>Policy</th>
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<tr>
<td>CLASSIFICATION:</td>
<td>Health and Safety</td>
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<tr>
<td>PURPOSE</td>
<td>Policy covering scope and responsibilities for Waste management in the Trust.</td>
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| Distribution:   | **Essential Reading for:** All Managers  
|                 | **Information for:** All Staff |
1. **Policy Statement**

1.1 University Hospitals Birmingham NHS Foundation Trust (the ‘Trust’) is committed to providing a safe, effective and efficient Waste Management Service in order to fulfil its obligations to protect the health, safety and welfare of staff, members of the public and the environment as a whole.

1.2 The purpose of this policy and its associated procedures is to ensure that the Trust’s waste is managed in a safe, secure, efficient and effective manner.

1.3 The aims of this policy are to ensure that:

1.3.1 There is a unified and consistent approach in respect of the storage, transportation and disposal of waste;

1.3.2 All relevant legislation, regulations, Health Technical Memoranda and good industrial practice guidelines is adhered to;

1.3.3 Waste is disposed of correctly, without endangering human health and without using processes or methods which could cause harm to the environment; and

1.3.4 Persons handling, producing, packaging, transporting or disposing of waste exercise care to avoid injury or risk of harm to themselves or others, as well as the environment as a whole.

2. **Scope**

2.1 This Policy applies to all aspects of waste management within the Trust and all individuals employed by the Trust including contractors, volunteers, students, locum and agency staff and staff employed on honorary contracts.

2.2 This Policy applies to Queen Elizabeth Hospital Birmingham, Queen Elizabeth Heritage Building (old QEH), Regent and Yardley Court Five Ways, Printing Services Raddlebarn Road and all UHB Sexual Health Service Premises. All other premises leased by the Trust are managed by their landlords.

3. **Framework**

3.1 This section describes the broad framework for the Waste Policy. Detailed instructions are provided in the Waste Management Procedures and Guidance. The Director of Estates & Facilities shall approve the associated documents and any amendments to such documents, and is responsible for ensuring that such documents are compliant with this policy.
3.2 An outline of the Waste Management process and responsibilities is set out at Appendix B.

3.3 When required, external support, advice and assistance shall be sought from various external specialists, including specialists from the Environment Agency, HSE and nominated Trust waste contractors.

3.4 All waste related incidents shall be reported and incidents that require investigation shall be notified to the Nominated Manager for Waste. These will be investigated in line with the Policy and Procedure for the reporting and management of Incidents, including Serious Incidents requiring investigation.

3.5 Waste within the Trust must not build up to the extent that waste security or safety is compromised.

3.6 **Handling Waste**

Where appropriate:

3.6.1 The Head of Occupational Health & Safety will provide an immunisation and health surveillance service, including health screening and medical examination, for all trust staff involved in the handling of healthcare waste.

3.6.2 Staff will be provided with appropriate personal protective clothing for handling waste.

3.6.3 Radioactive waste shall be handled in accordance with the Radiation Safety Policy.

3.6.4 The nominated Trust Manager for waste must be consulted in the disposal of any waste streams that fall outside of the Trusts normal waste management procedures.

3.6.5 All waste shall be correctly identified, recorded and stored by ensuring that:

- Waste is suitably segregated and stored in accordance with the Trust Waste Procedure;
- the correct primary and secondary packaging is used for each waste stream;
- the Trusts main waste storage areas and compounds are suitably managed;
- a suitably qualified and experienced member of staff is always present when waste contractors attend to collect and consign waste; and
• waste streams are always segregated during internal transportation and at each point of storage, including within the designated compounds.

3.7 Training

All staff shall be provided with appropriate training in respect of handling, segregation, storage, transportation and disposal of waste commensurate with their role. This will include:

• Information on waste management will be provided to all staff at Corporate Induction new starters;
• Local Induction - Departmental new starters;
• Mandatory waste training for all staff; and
• Managing Risks e-learning module. All nominated staff.

3.8 Risk Assessments

3.8.1 All departments must carry out departmental risk assessments in respect of their waste activities. These must be recorded and kept with their standard local risk registers. The risk assessments need to address primary packaging of waste, storage and consignments. Based on these risk assessments suitable control measures should be implemented to minimise any risks. Any significant risks relating to waste management must be escalated to the divisional risk register.

3.8.2 The Logistics Manager must carry out annual risk assessments for the storage, collection and consignment of waste as a whole, for tasks and activities carried out by Logistics Staff.

3.9 Service Providers

3.9.1 The Trust shall appoint recognised and suitable waste contractors for the collection, transportation and disposal of their waste products. All primary and secondary waste packaging, where applicable, will meet UN Standards.

3.9.2 Contractors will be required to act in accordance with this policy, associated procedures and applicable legislation relating to the collection, storage, transportation consignment and disposal of all waste produced and collected on behalf of the Trust.
4. **Duties**

4.1 **Director of Estates & Facilities**

The Director of Estates & Facilities has responsibility for waste management arrangements throughout the Trust.

4.2 **Trust Operational Contracted Services Manager**

The Trust Operational Contracted Services Manager shall be responsible for:

4.2.1 Contractual management of all waste contracts on behalf of the Trust;

4.2.2 The planning, delivery and management of the Waste Management Service; and

4.2.3 The development and implementation of this Policy and its associated procedures

4.3 **Managers and Supervisors**

Managers shall ensure that the Waste Policy and its associated documents are effectively implemented within their area of responsibility and in so doing ensure that:

4.3.1 Departmental waste management processes and procedures are reviewed in accordance with annual Health and Safety audits this will include and not limited to risk assessments applicable to the waste processes in their area, which will be reviewed annually.

4.4 **All Staff**

All staff must comply with Trust policy and procedures. They shall not undertake any actions that could compromise their own or any other persons safety, health or welfare, failure to adhere to this policy and associated procedures may result in disciplinary action.

All staff must:

4.4.1 Handle waste in accordance with the Trust Waste Management Procedures;

4.4.2 Attend waste training sessions as required and put training into practice;

4.4.3 Report any problems or failures with equipment or waste management procedures to their line manager and report the incident in accordance with the Policy for the Reporting and Management of Serious Incidents, Requiring Investigation;
4.4.4 Assist management in investigating any waste incidents;

4.4.5 Not interfere with or misuse anything provided to ensure the safety and security of waste; and

4.4.6 Not remove any waste containers or equipment for handling waste from Trust premises unless authorised to do so.

4.5 **Logistics Management**

Members of Logistics Management are in the main responsible for the collections and centralised storage of waste in the Trust. They will ensure that:

4.5.1 risk assessments are carried out in relation to the storage and collection of waste and that they are reviewed annually and any risks relating to waste are investigated appropriately and entered into the appropriate risk register;

4.5.2 all of their staff comply with the Trust waste management procedures and receive appropriate training;

4.5.3 waste consignment notes are completed correctly and that waste descriptions recorded do match the waste that is being consigned for disposal by the department;

4.5.4 All waste equipment is used in accordance with its designated purpose and in accordance with manufacturers instructions and health and safety obligations, including with regards to waste compactors, bailing machines and storage containers. In so doing to ensure that staff are fully trained and that at all times they adhere to the agreed safe systems of work at all times;

4.5.5 They suitably and regularly monitor waste management systems and practices;

4.5.6 They maintain detailed records applicable to waste management, including with regards to staff training, risk assessment, monitoring, safe systems of work, standard operational procedures, waste consignment and delivery notes;

4.5.7 All failures in the waste management system are investigated and reported in accordance with the Trust Incident Reporting system; and

4.5.8 In the event of an incident that emergency procedures are followed by all Logistics staff, e.g. waste spillage.
4.6 Nominated Trust Manager Responsible for Waste

4.6.1 The Trust’s Operational Contracts Manager, responsible to the Head of Estates is the nominated Trust Manager responsible for waste; the nominated manager will have an understanding and knowledge of:

- Environmental waste management;
- Legislative and regulatory requirements;
- Management of Healthcare waste; and
- Management of waste contractors/contracts.

4.6.2 The Nominated Manager for waste shall be operationally responsible for:

- The design, communication, auditing, review and implementation of the Trust’s waste management systems, policies, practices and procedures, including with regards to assigned designated waste contractors;
- The yearly registration of Trust premises with the Environment Agency as required under the Hazardous Waste (England and Wales) Regulations;
- Providing applicable waste management information to the Trust Corporate Risk and Compliance Unit;
- Investigating and reviewing waste incidents and risks. In so doing to report significant failures and proposed remedial measures, as well quarterly waste compliance reports, to the Trust Health, Safety and Environment Committee;
- Maintaining applicable waste records;
- Carrying out waste audits;
- Ensuring that effective contingency plans are in place;
- Ensuring if applicable that the appropriate Regulatory Authority is informed, upon direction from the Director of Estates and Facilities in respect of any failure in the Waste Management system that results in breaches in legislative requirements;
- Ensuring that all regulatory requirements, including licences, licence exemptions, carriers certificates and
competency of operators exist and are monitored as part of the contract with any Waste Contractor;

- Undertaking annual pre qualification inspections with the assigned Service Providers and nominated Trust specialists. In so doing to ensure that any required actions are suitably implemented; and

- Carry out annual ‘Duty of Care’ inspections of all nominated waste contractors;

4.7 **Logistics staff**

Logistics staff shall be responsible for:

4.7.1 The delivery of empty hazardous (clinical waste) waste containers internally within the Trust to user wards and departments;

4.7.2 The collection and transportation of waste internally within the Trust to designated storage areas;

4.7.3 The labelling of hazardous (clinical waste) waste containers as part of the consignment obligations;

4.7.4 Keeping auditable records of all waste consigned; and

4.7.5 Completing waste consignment notes.

5. **Implementation and Monitoring**

5.1 **Implementation**

This Policy shall be implemented by all levels of management and be available to all staff on the Trust intranet site

5.2 **Monitoring**

Appendix A contains details of how the policy will be monitored

6. **Associated Policy and Procedural Documentation**

Health and Safety Policy

Logistics Internal Procedure for the Storage, Collection and Consignment of Procedure for the handling of patients’ cash, valuables and property (Appendix 3 – storage, collection and disposal of used plastic patients cash and valuable bags)
Management of Medical Devices Policy

Policy for the Prevention and Management of Incidents including Serious Incidents

Risk Management Strategy and Policy

Security Policy

Waste and Soiled Linen

7. References

Carriage of Dangerous Goods Regulations 2009

Control of Substances Hazardous to Health Regulations (COSHH) 2002 (as amended 2004)

Controlled Waste Regulations 1992 (amended 1993)

Environmental Protection Act 1990

Environmental Protection (Duty of Care) Regulations 1991 (as amended 2003)

Ionising Radiations Regulations 1999, Statutory Instrument SI 1999/3232

Hazardous Waste (England and Wales) Regulations 2005

Healthcare Technical Memorandum 07-0, DOH November 2006

Health and Safety at Work etc. Act 1974

Health & Safety Executive Website, www.hse.gov.uk

Human Tissue Act 2004

Management of Health and Safety at Work Regulations 1999

Radioactive Substances Act (1993)

Safe Management of Healthcare Waste 2011

Standard Operating Procedure for the Internal Packaging, Storage and Consignment of Anatomical Waste (Human Tissue)

Waste Electrical and Electronic Equipment Regulations 2006 (WEEE 2013)

### Appendix A

#### Monitoring Matrix

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<th>MONITORING OF IMPLEMENTATION</th>
<th>MONITORING LEAD</th>
<th>REPORTED TO PERSON/GROUP</th>
<th>MONITORING PROCESS</th>
<th>MONITORING FREQUENCY</th>
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| Adherence to the policy and the associated procedures | Trust Operational Contracted Services Manager | Trust Health & Safety and Environment Committee. Meeting with Waste contractors | As part of the Trust’s yearly Producer’s Return waste audit that will include but not be limited to a review of:  
- Waste documentation (e.g. consignment notes, risk assessments)  
- Waste container and other associated equipment  
- Waste storage facilities  
- Waste practices and procedures | Annually |
| Adherence to the policy and the associated procedures | Trust Operational Contracted Services Manager | Trust Health & Safety and Environment Committee Meetings with Waste contractors | External inspections to waste contractors’ sites undertaken as part of yearly duty of care visits | Annually |
| Adherence to the policy and the associated procedures | Trust Operational Contracted Services Manager | Trust Health & Safety and Environment Committee Meetings with Waste contractors | Audit of the waste contractors’ health and safety systems and documentation | As part of contract tendering process and thereafter every three years |
Appendix B: Waste Management Flowchart

**Waste Process**

1. Waste Produced
2. Primary Packaging/Storage (includes Segregation)
3. Collection Removal
4. Local Storage (Ward/Department)
5. Internal Collection/Transport
6. Centralised Storage
7. Consignment of Waste
8. Transportation
9. Disposal

**Responsibility**

- **All Trust Staff, Visitors and Patients**
- **Logistics Services and Ward/Department Staff**
- **Logistics Services Staff**
  - (Exception - direct Departmental collections by external waste contractors)
- **Logistics Services Staff**
- **Logistics Services and Specific Authorised Departments**
  - (See Waste Management Procedures)
- **Nominated Waste Contractor**