



North West Ambulance Service



NHS Trust

Delivering the right care, at the right time, in the right place

# Waste Management Policy

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| Recommended by                |                          |
| Approved by                   | Quality Committee        |
| Approval date                 | November 2016            |
| Version number                | 3.4                      |
| Review date                   | November 2018            |
| Responsible Director          | Finance Director         |
| Responsible Manager (Sponsor) | Support Services Manager |
| For use by                    | All Trust Employees      |

This policy is available in alternative formats on request by contacting  
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|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 2           |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

## Change record form

| Version | Date of change                 | Date of release | Changed by             | Reason for change   |
|---------|--------------------------------|-----------------|------------------------|---|
| 0.1     | 25 <sup>th</sup> June 2009     |                 | C Baker                | Document creation   |
| 0.2     | 23 <sup>rd</sup> July 2009     |                 | N Maher                | 2 <sup>nd</sup> draft   |
| 1.0     | 14 <sup>th</sup> August 2009   |                 | N Maher                | Board approved document   |
| 2.0     | 21 <sup>st</sup> Sept 2011     |                 | K Bamford              | Document update   |
| 3.0     | 24 <sup>th</sup> June 2014     |                 | S Fawcett              | Periodic Review   |
| 3.1     | 14 <sup>th</sup> August 2014   |                 | S Fawcett              | Revised version following review by Catalyst Waste Management   |
| 3.2     | 9 <sup>th</sup> September 2014 |                 | S Fawcett              | Document update   |
| 3.3     | 27 <sup>th</sup> January 2016  |                 | S Fawcett              | Revised version following changes to roles and responsibilities |
| 3.4     | 27 <sup>th</sup> May 2016      |                 | Waste Management Group | Minor changes to format   |

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 3           |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

## Contents

|    |  |    |
|----|--|----|
| 1  | Introduction                                   | 5  |
| 2  | Scope and Definitions                          | 5  |
| 3  | Objectives                                     | 6  |
| 4  | Duties   | 7  |
| 5  | Segregation and Packaging of Waste             | 13 |
| 6  | Waste Handling                                 | 13 |
| 7  | Waste Storage, Movement and Collection         | 14 |
| 8  | Operation of Waste Handling Equipment          | 14 |
| 9  | Health and Safety                              | 14 |
| 10 | Monitoring and Auditing                        | 15 |
| 11 | Legal Paperwork, Record Keeping and Contracts  | 15 |
| 12 | Waste Reduction, Reuse, Recycling and Disposal | 16 |
| 13 | Training                                       | 16 |

## Appendix

|                        |    |
|------------------------|----|
| Definitions            | 17 |
| Guidance & Legislation | 18 |
| NWAS Documents         | 19 |

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 4           |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

## 1 Introduction

- North West Ambulance Service NHS Trust (NWAS) acknowledges the environmental and health impacts of waste generated by its activities and operations and will seek to limit any adverse environmental impact resulting from the disposal of waste through waste prevention.
- The aim of this policy and Waste Management Manual is to meet or exceed all current and forthcoming legislation and guidance governing the safe and correct handling, storage, treatment and disposal of all wastes.
- NWAS recognises the financial benefits of efficient waste management, both in reducing waste disposal costs and reducing the potential costs of non-compliance with legal requirements.
- The Trust will work closely with regulatory authorities, the local healthcare community, staff, patients, neighbours, suppliers and contractors to ensure it minimises the environmental impact of providing healthcare services within the North West and the surrounding counties.
- Responsibility for waste management issues will be clearly identified and delegated to all levels of the Trust as appropriate.
- Adherence with this policy and the Waste Management Manual places responsibility on all staff involved in the production, segregation, handling, movement and disposal of waste to ensure compliance with current legislation and relevant good practice guidance.
- This policy is allied to the Trust Sustainable Development Plan and will be implemented and monitored by means of a total waste management approach incorporating appropriate policies, procedures and working arrangements. The underlying philosophy is the Waste Management Hierarchy and the effective and efficient management of waste from point of production through to final disposal.
- The Trust will aim to comply with all relevant waste management legislation (see appendix) and follow the recommendations of the national good practice guidance HTM 07-01: Safe Management of Healthcare Waste (2013).
- The Trust recognises and accepts that it must take all reasonable steps to dispose of waste legally and properly in all premises that it owns or occupies.

## 2 Scope and Definitions

- This policy covers waste management activity relating to all waste streams produced by NWAS staff.

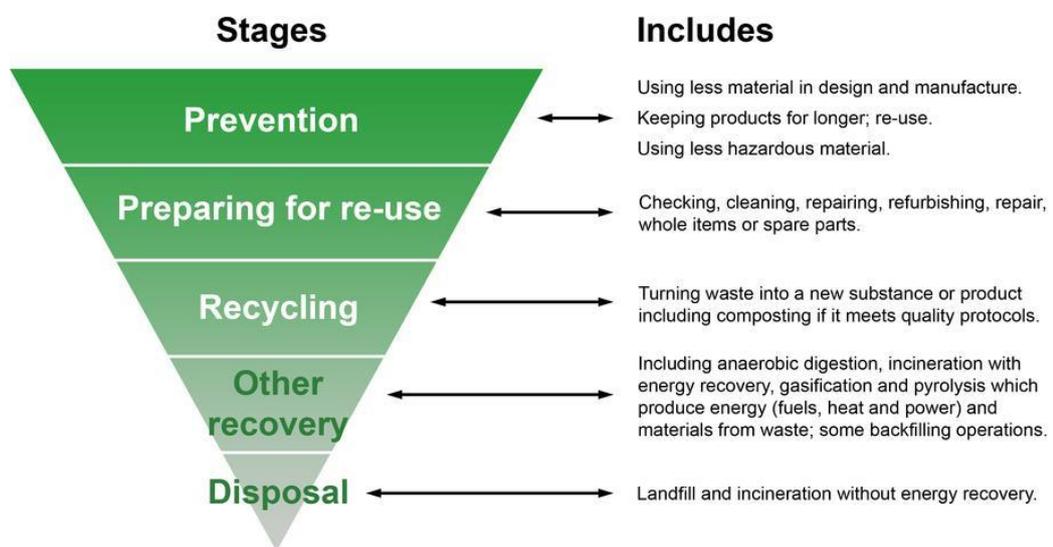
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|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 5           |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

- The policy applies to all NWAS staff, all volunteers plus other NHS employees generating, handling and disposing of waste as part of NWAS business and not just those with a specific responsibility for waste management.
- The policy relates to the management of suppliers, contractors and sub-contractors who have a specific role to play in the management of the Trust’s waste.
- The various definitions used within this document are listed in the appendix.
- The responsibilities relating to NWAS staff are outlined in section 4.

### 3 Objectives

- The Trust accepts that its operational activity will inevitably result in the production of waste, but also recognises that opportunities exist to minimise its impact on the environment. Therefore this policy aims to ensure that the Trust works towards the sustainable management of waste and focuses on the principles of the Waste Management Hierarchy, as well as the reduction of pollution and efficiency cost savings that can be applied to direct patient care.
- The Waste Management Hierarchy lists the options for dealing with waste with the most favourable option as waste prevention (as indicated in the diagram below).

#### The Waste Hierarchy



Source: Department of the Environment Food and Rural Affairs, 2011

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 6           |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

- The objectives of this policy are to:
  - Ensure compliance with Health & Safety, environmental and other waste related legislation by adherence to best practice at all times.
  - Provide staff with clear and easily accessible guidance in the safe handling and disposal of waste in line with Health & Safety and Infection Prevention and Control requirements.
  - Identify specific roles and responsibilities within its organisation structure for the effective management of waste.
  - Minimise the impact which the Trust's business activity has on the environment through sustainable waste management.
  - Minimise the risk to staff, patients, public, contracted staff and their agents from exposure to hazardous or potentially hazardous waste.
  - Actively seek out opportunities to prevent or minimise waste at source and to reuse-recycle waste where possible.
  - Maintain a Duty of Care from point of production through to final disposal, thus ensuring disposal by the most appropriate means.
  - Constantly strive to improve environmental performance through risk assessment, target setting, audit and periodic reviews of current practice.
  - To ensure consistency of approach to waste management throughout the Trust, whilst providing a flexible framework to accommodate the needs of individual ambulance stations, vehicle workshops and corporate buildings.

## 4 Duties

### 4.1 General

- All staff employed within NWAS who produce, handle and dispose of waste have a legal Duty of Care to ensure that they do this safely and appropriately, following the necessary policies and procedures.

### 4.2 Chief Executive

- The Chief Executive is accountable for ensuring compliance with the statutory requirements relating to waste management and the environment.
- Additional responsibilities include:
  - Ensuring that the requirements specified within the Waste Management Policy and Manual and any associated procedures are adequately resourced and implemented.
  - Ensuring that this policy is implemented and adhered to across the whole of the Trust's activities and operations.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 7           |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

- Encouraging and promoting sustainability and environmental best practice and supporting waste prevention and reduction initiatives.
- Ensuring that the officers of the Trust charged with the duty for managing waste are suitably qualified and sufficiently experienced to fully discharge their responsibilities.
- Ensuring that the Waste Management Policy and Manual undergo a periodic review.

### 4.3 Executive Directors

- Executive Directors are responsible for ensuring that the Trust’s Waste Management Policy is effectively implemented within their own Directorates.
- The **Director of Finance** has Board level responsibility for this policy and waste management matters in general with specific responsibility for:
  - Providing an annual waste management report to the Board
  - Providing sufficient resources to ensure that all waste is handled, segregated, stored, treated and disposed of safely and in accordance with the relevant legislation.

### 4.4 Assistant Director of Estates and Fleet

- The Assistant Director of Estates and Fleet has delegated responsibility for the overall operation of all Trust Estate services, and the development, maintenance and implementation of the Trusts Estates Strategy.

### 4.5 Support Services Manager

- The Support Services Manager has delegated responsibility for the production and management of this policy and the Waste Management Manual (where applicable) and will act as Chair of the Trust Waste Management Group with support from the Waste Control & Minimisation Officer.

### 4.6 Trust Waste Management Group

- The Trust Waste Management Group comprises of the following staff members or departmental representatives; Support Services Manager (Chair), Waste Control & Minimisation Officer, Specialist Infection Control Practitioner, Estates – Environmental, Health and Safety Practitioner, Medicines Performance Facilitator, Workshops, IT, Procurement. Other post holders within the Trust shall routinely attend meeting in an advisory capacity.
- The Trust Waste Management Group is responsible for:
  - Promoting Trust wide compliance with relevant legislation and guidance

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 8           |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

- Protecting human health and the environment in relation to the safe/proper management of the Trust's waste streams
- Planning for improved waste management and future legislative changes
- Regularly reviewing and approving the Trust's waste management training programme
- Regularly reviewing and following up waste related accidents and incidents
- Regularly reviewing Trust waste production figures/costings with a view to improving the reduction, reuse and recovery of waste
- Liaising with regulatory authorities and other interested parties in relation to Trust waste issues
- Providing advice, guidance and support in relation to this policy and the Waste Management Manual.
- Communicating relevant waste related issues to Trust staff, the local community and other interested parties.

#### 4.7 Waste Stream Leads

- The following table shows the all the trusts waste streams and the relevant leads for providing advice, guidance and support in relation to this policy and the Waste Management Manual: -

| Job Title                         | Waste stream(s) responsible for   |
|-----------------------------------|---|
| Support Services Manager          | Domestic<br>Recycling<br>Batteries – except Workshops<br>WEEE – except fluorescent tubes and IT related<br>Bulky waste – inc. furniture<br>Sanitary |
| Estates Manager                   | Construction & Maintenance<br>Asbestos<br>WEEE – fluorescent tubes<br>Grounds and maintenance   |
| Head of Clinical Safety           | Clinical  |
| Fleet Compliance Manager          | Workshops – inc. scrap metal  |
| Medicines Performance Facilitator | Controlled Drugs & Medicines - via clinical waste stream  |
| IM&T Manager                      | WEEE – IT related   |
| Clinical Records Manager          | Confidential  |

- Where relevant, the above managers also have responsibility for the following areas with regard to the waste streams they manage: -
  - Ensuring that waste is disposed of by appropriately registered/licensed/permited waste management companies.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 9           |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

- Keeping on file copies of relevant liability insurance, carriers licences and other documentation from contractors handling or receiving waste from the Trust.
- Identifying and promoting waste reduction initiatives.
- Advising Operational Managers on the correct classification and segregation of waste.
- Ensuring that all contractors working under the control of NWAS are familiar with and comply with the requirements of this policy and the Waste Management Manual.

#### 4.8 Senior Managers

- All Trust managers are responsible for the management of waste generated by the activities and operations of their staff and for the effective application and implementation of this policy and the Waste Management Manual.
- In particular managers are responsible for:
  - Assisting, as appropriate, in implementing procedures for waste handling, storage, treatment and disposal arising from their activities.
  - Ensuring that all their staff are aware of, and comply with, this policy and the Waste Management Manual.
  - Reporting and investigating adverse waste management incidents.
  - Ensuring that all staff are aware of the risks associated with the wastes they are dealing with and are provided with adequate protective clothing and equipment.
  - All staff involved in the production, segregation, handling, storage and disposal of waste, receiving adequate and appropriate training to ensure they understand the health, safety and environmental risks associated with the different waste streams and comply with relevant legislation and guidance.
  - Keeping records of staff waste training.
  - Ensuring that all staff receive necessary immunisations (where applicable) and that personal protection and basic hygiene precautions are adhered to.
  - Ensuring that risk assessments have been carried out and that appropriate action is taken to minimise any risk due to waste management activities.
  - Identifying and applying appropriate auditing, monitoring and control procedures to ensure compliance with this policy, the Waste Management Manual and relevant legislation and providing regular reports on findings.
  - Assisting and supporting waste reduction initiatives such as minimising packaging and recycling.
  - Ensuring that waste storage and collection points are correctly identified, are only used for storage of designated waste types and are kept clean and tidy.
  - Ensuring that staff are familiar with and adhere to procedures for dealing with waste spillages and untoward incidents.
  - Ensuring that wastes are correctly identified and dealt with including, where required, the operation of legal paperwork systems and records (as detailed in the Waste Management Manual). Ensuring that all staff involved with legal paperwork systems and records receive adequate and appropriate training.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 10          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

- Providing information to assist in the preparation of waste management reports to the Trust Board.
- Ensuring that any contractors working under their control are familiar with and comply with the requirements of this policy and the Waste Management Manual.

#### 4.9 Specialist Infection Control Practitioner

- The Specialist Infection Control Practitioner is responsible for:
  - Conducting, audits on relevant elements of waste management.
  - Advising on infection prevention and control matters where these relate to waste handling, segregation, storage, movement, treatment and disposal.
  - Providing advice and guidance as required on safe practices and procedures for handling clinical and other healthcare waste materials.
  - Provide the information and guidance on relevant aspects of waste management training. The training team will facilitate and monitor waste related training initiatives.

#### 4.10 Health and Safety Practitioner

- The Health and Safety Practitioner is responsible for:
  - Monitoring the following key Health and Safety and clinical safety performance criteria through a formalised untoward incident reporting mechanism:
    - Frequency of sharps injuries
    - Frequency of reportable spillages
    - Register of RIDDOR incidents.
  - Assisting in ensuring waste related risk assessments as well as COSHH assessments are carried out and managed.

#### 4.11 Medicines Performance Facilitator

- The Medicines Performance Facilitator is responsible for providing advice and guidance on safe procedures for the handling and disposal of waste medicines, including non-hazardous and hazardous pharmaceuticals and Controlled Drugs, in line with the Medicines Management Policy

#### 4.12 Head of Procurement

- The Head of Procurement is responsible for:
  - Ensuring that all purchases take the impact of packaging into account, with the aim of eliminating secondary packaging where feasible.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 11          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

- Specifying packaging type and making suppliers responsible for the removal of their own packaging by inclusion in the tender criteria.
- Ensuring that all purchases include provision for waste disposal costs and consider the life cycle of particular items, i.e. purchase costs of electrical and electronic items include a fee for subsequent disposal/recycling.
- Preparing tender documents for waste management contracts as required, inviting tenders and advising Operational Managers on the award of contracts.
- Considering sustainable waste management options, innovative and new technologies as well as value for money when awarding waste management contracts.
- Purchasing recycled products where appropriate and subject to satisfying value for money criteria.
- Exploring opportunities for the reuse and re-distribution of certain items of equipment and furniture within the organisation, rather than disposal.

#### 4.13 All Employees

- All Trust employees have the following responsibilities under this policy:
  - Making themselves familiar with, adhering to and observing the requirements of Trust waste management procedures detailed in the Waste Management Manual.
  - Participating in any relevant waste management training that is provided by the Trust.
  - Reporting dangerous waste incidents and situations to their line manager as soon as they are identified and assisting with any resulting investigation.
  - Ensuring that spillages and untoward occurrences are dealt with in accordance with safe working procedures.
  - Not handling any waste considered too heavy to lift or for which the correct method of disposal is not known and, where there is any doubt, contacting their line manager for advice.
  - Wearing protective clothing and using protective equipment in accordance with any working procedure applicable to the particular waste handling or disposal task being undertaken.
  - Assisting with waste prevention, reuse and recycling initiatives and contributing towards the development and improvement of safe and effective waste handling and disposal practices.
  - Ensuring that the nature and dangers of waste being carried is made known to others involved in the waste disposal process, for example by proper segregation and clear labelling of waste.
  - Assisting with the completion of legal paperwork for movements of waste as appropriate and keeping adequate legal paperwork records.
  - Assisting with the correct classification, segregation and reduction of waste as indicated in this policy and the Waste Management Manual.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 12          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

#### 4.14 Contractors

- All personnel employed by or working on behalf of the Trust, including contractors, must be familiar with, and adhere to this policy and relevant sections of the Waste Management Manual. In particular this includes:
  - Accepting supervision from the appropriate Trust manager to ensure compliance with this policy and the Waste Management Manual and any appropriate legal and statutory obligations.
  - Making provision for the safe and compliant management of all waste arising from their activities, through the use of suitably registered, licensed and permitted waste management companies. This includes the use of appropriate legal paperwork for all movements of waste and adequate associated record keeping.

### 5 Segregation and Packaging of Waste

- In order to comply with legislation and ensure the protection of both human health and the environment, the various categories of waste produced by the activities of the North West Ambulance Service (on Trust premises, on the public highway, in patient homes and at other healthcare facilities) must be kept segregated and appropriately packaged at all times.
- Segregation is applicable during production, storage, movement and final disposal.
- Bagged clinical waste, sharps containers, medicine waste containers and cytotoxic/static waste containers must be identified regarding the site of production (i.e. relevant Ambulance Station), using either labels or tags.
- Procedures for the correct segregation and packaging of the various waste streams are detailed in the Waste Management Manual.

### 6 Waste Handling

- All waste must be handled carefully and safely by all staff to avoid injury or risk of infection to themselves, other staff members, patients or members of the general public and to protect the environment.
- Staff must follow the procedures for waste handling as indicated in the Waste Management Manual.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 13          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

## 7 Waste Storage, Movement and Collection

- All waste must be stored segregated, safely and securely, both inside and outside NWAS premises and vehicles.
- Waste awaiting collection from contractors, should be stored in lockable containers or areas where possible.
- All waste being collected by waste contractors for off-site disposal must be accompanied by the appropriate legal paperwork, as indicated in section 11.
- All waste should be stored, moved and collected according to the requirements of the Waste Management Manual.

## 8 Operation of Waste Handling Equipment

- Waste handling equipment (such as wheeled bins and shredders) shall only be used by authorised and fully trained staff.
- When not in use, all waste handling equipment should be kept secure to prevent access/use by unauthorised persons.
- Further information on the operation of waste handling equipment is provided in the Waste Management Manual.

## 9 Health and Safety

- Relevant managers (or other designated responsible persons) will carry out Risk Assessments to identify and assess the risks to staff from any waste related duties and activities (including waste handling and movement). This will be carried out in accordance with the relevant Trust policy.
- All accidents, incidents and near misses must be reported, recorded and investigated via the NWAS Incident Reporting System.
- All staff should be issued with and wear appropriate protective clothing and equipment, to allow them to complete any waste related duties, in a safe manner. Staff handling clinical and other hazardous wastes should be offered immunisation.
- All waste spillages must be regarded as potentially hazardous and dealt with immediately.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 14          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

- Further information relating to Risk Assessments, incident reporting, protective clothing, immunisations and waste spillages are provided in the Waste Management Manual, Health and Safety Policy and Infection Prevention and Control Policy.

## 10 Monitoring and Auditing

- Various aspects of waste management across NWAS will be regularly audited and monitored, with any issues of non-compliance or poor practice recorded, reported to the relevant manager and/or committee and prioritised in action plans.
- Auditing and monitoring exercises will include:
  - Legal paperwork
  - Healthcare Waste Pre-Acceptance
  - Duty of Care
  - Infection prevention and control (waste related issues).
- Further information on auditing and monitoring is included in the Waste Management Manual.

## 11 Legal Paperwork, Record Keeping and Contracts

- Under no circumstances must any wastes be removed from an NWAS site without a completed Hazardous Waste Consignment Note or Waste Transfer Note. In some cases an Annual Waste Transfer Note may be applicable, for movements of non-hazardous waste streams.
- Adequate records must be kept of all legal paperwork, as well as Site Registers for all hazardous waste streams.
- Staff should be made aware of the conditions of Environmental Permitting Exemptions where appropriate.
- Waste Management Contracts will be held and managed by designated responsible managers, depending on the waste streams involved.
- More detailed information on legal paperwork, record keeping and contracts is provided in the Waste Management Manual.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 15          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

## 12 Waste Reduction, Reuse, Recycling and Disposal

- Waste produced by NWAS may be disposed of in a variety of ways including; reuse, recycling or recovery, landfill, incineration or alternative treatment.
- The Trust will apply, where possible, the requirements of the Waste Hierarchy, when considering waste disposal options.
- Where feasible the Trust will aim to either prevent the production of or, reduce the amount of waste produced across all of its premises. Where reduction is not an option, NWAS will aim to introduce reuse and recycling schemes to minimise the amount of waste requiring final disposal.
- It is essential that the appropriate disposal method is utilised for each waste stream to ensure compliance with relevant legislation and to protect human health and the environment.

## 13 Training

- All clinical and non-clinical staff will receive training in waste management relevant to their role, with training certificates held by relevant managers and copies in staff personnel records.
- More detailed information on the types of waste management related training available for NWAS staff is provided in the Waste Management Manual.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 16          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

## Appendix

### Definitions

**Legal Paperwork** – paperwork, including Hazardous Waste Consignment Notes and Waste Transfer Notes, that is required to be completed prior to the removal of any waste from a producer’s premises. Adequate records of this paperwork must be kept by all those involved (producer, carrier, consignee).

**Hazardous Waste Consignment Note** – legal paperwork that must be completed for the movement of any hazardous waste streams from a producer’s premises.

**Waste Transfer Note** – legal paperwork that must be completed for the movement of any non-hazardous waste streams from a producer’s premises.

**Consignee Returns** – Reports on any hazardous waste received, treated or disposed of by a business (the consignee). Consignee Returns should be received every quarter from the consignee dealing with the hazardous waste concerned.

**Site Register** – records of movements of hazardous waste, including copies of Hazardous Waste Consignment Notes, Consignee Returns, Rejection Notes and any Carriers Schedules.

**Duty of Care Audit** – A process undertaken by a producer or carrier of waste to check how their waste is packaged, described, transported and disposed of by the various parties involved in the managing the waste from point of production through to final disposal. Although this is not a legal requirement, it is recommended good practice.

**Waste Pre-Acceptance Audit** – A process undertaken by the waste producer (or a third party on their behalf) to assess the characteristics of wastes being produced, to enable a decision to be made about the appropriate disposal or recovery method for the waste. This is a legal requirement for non-household producers of clinical waste streams.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 17          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

## **List of Relevant Waste Management, Health and Safety Guidance and Legislation**

### **Guidance:**

2013, HTM 07-01 Safe Management of Healthcare Waste Version, Department of Health

2013, Guidance on the management of waste arising from health, social and personal care, Royal College of Nursing

2013, Technical Guidance WM2: Hazardous Waste – Interpretation of the definition and classification of hazardous waste, Environment Agency, SEPA, NIEA, Natural Resources Wales

October 2010, Clinical Waste Pre-Acceptance – Producer Update , Environment Agency

[http://www.environment-agency.gov.uk/static/documents/Business/Briefing\\_note\\_Oct\\_2010\\_vs\\_6\\_final.pdf](http://www.environment-agency.gov.uk/static/documents/Business/Briefing_note_Oct_2010_vs_6_final.pdf)

September 2013, Clinical Waste Pre-Acceptance Information, Environment Agency

2014, Needlestick Injury Advice, NHS Choices (website)

### **Legislation:**

1990, The Environmental Protection Act, HMSO

2012, The Controlled Waste (England and Wales) Regulations, HMSO

2012, The Controlled Waste (England and Wales) (Amendment) Regulations, HMSO

2011, The Waste (England and Wales) Regulations, 2011, HMSO

2012, The Waste (England and Wales) (Amendment) Regulations 2012, HMSO

1989, The Control of Pollution (Amendment) Regulations, HMSO

1991, The Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations, HMSO

2010, The Environmental Civil Sanctions (England) Order, HMSO

2010, The Environmental Civil Sanctions (Miscellaneous Amendments) (England) Regulations, HMSO

2005, The List of Wastes (England) Regulations, HMSO

2005, The List of Wastes (England) (Amendment) Regulations, HSMO

2005, The Hazardous Waste (England & Wales) Regulations 2005, HMSO.

2009, The Hazardous Waste (England & Wales) (Amendment) Regulations, HMSO.

|                         |                          |                 |             |
|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 18          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |

2006, The Waste Management (England and Wales) Regulations, HMSO

2012, The Environmental Permitting (England and Wales) (Amendment) Regulations, HMSO

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|-------------------------|--------------------------|-----------------|-------------|
| Waste Management Policy |                          | Page:           | 19          |
| Author:                 | Support Services Manager | Version:        | 3.4         |
| Date of Approval:       | November 16              | Status:         | Final       |
| Date of Issue:          | November 16              | Date of Review: | November 18 |