



WASTE MANAGEMENT POLICY

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

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Lead Manager	Waste Management Officer
Responsible Director	Director of Estates and Facilities
Approved By	Health and Safety Forum
Version	V3 Replaces V2 2013 and V1 2009
Date Approved	April 2019
Date for Review	April 2020

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 Prevention and Control of Infection Policy and guidance, The Environmental and Sustainability 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 Managers/ All Staff

Policy Statement:

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;

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

NHS GGC recognises the importance of the requirement to appoint a Waste Management Officer (WMO) to coordinate and review wastes management activities and resources. NHS GGC acknowledges that waste management can only be effective when everyone (staff and visitors) takes responsibility for waste.

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;

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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 wastes 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)

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 wastes and surplus materials is a significant managerial responsibility comparable in importance to other management and performance objectives;

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;

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;

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;

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. Working closely with procurement to minimise the amount of waste generated and, where appropriate, purchase items with recycled content, thereby stimulating local recycling markets;
- 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

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monitoring as necessary to ensure the implementation of waste and material management systems;

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.

Duty-of-care

NHS GGC fully recognises its duties as set out in The Duty of Care as described in Section 34 of the Environmental Protection Act 1990. The Act was recently amended in Scotland by the Waste (Scotland) Regulations 2012 and the requirements with respect to documentation, including electronic documentation can be found in the [Environmental Protection \(Duty of Care\) \(Scotland\) Regulations 2014](#). Further guidance can be found in the '[Duty-of-Care – A Code of Practice](#)' published in October 2012.

The Code of Practice outlines the obligations of those involved in the waste management chain, from waste producer to final disposal. It requires producers and others who are involved in the management of the waste to prevent its escape and take all reasonable measures to ensure that the waste is dealt with appropriately from the point of production to the point of final disposal. In order to comply with this requirement, NHS Boards should:

- ensure that waste is segregated in a manner which allows for the recovery of materials;
- ensure that a written description, adequately describing the type and quantity of waste, accompanies all waste movements;
- ensure that those who manage the waste and sites receiving the waste are authorised to do so; and
- maintain records of all waste movements.

For some wastes, such as healthcare waste as well as other wastes with hazardous properties, NHSScotland may request formal confirmation that the waste has been suitably treated or disposed of. Confirmation of disposal should be kept with copies of waste documentation to provide auditable records.

The Duty-of-Care Code of Practice takes a resource-centred approach which is summarised in the five-step 'waste hierarchy' (shown below):



Waste producers should aim to manage waste using practices as far up the hierarchy as possible and disposal should be avoided.

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The Waste (Scotland) Regulations 2012 and the [Waste Management Licensing \(Scotland\) Regulations 2011](#) place a duty on all persons who produce, keep or manage waste (including Local Authorities) to take all reasonable steps to apply the waste hierarchy. [Guidance on Applying the Waste Hierarchy](#) is available from the Scottish Government web site.

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NHS Greater Glasgow and Clyde WASTE MANAGEMENT POLICY

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

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, a large variety of wastes are produced; these can be classified broadly into the following five 'core' waste streams:

1. **healthcare (including clinical) waste** – waste produced as a direct result of healthcare activities which may pose a risk of infection and/or is medicinally contaminated;
2. **other (non-healthcare) special wastes** – waste with hazardous characteristics produced from support (non-healthcare) activities, such as paints, batteries and waste electrical and electronic equipment (WEEE);
3. **source-segregated recyclates** – glass, paper, card, plastics, cans and other metals suitable for recycling;
4. **Construction waste**? Minor Estates and capital projects works
5. **food waste** – unwanted food from catering,
6. **residual waste** – the fraction of waste that remains once all special waste, recyclates and food have been removed at source. This is typically described as 'black bag' or 'domestic' or municipal waste.

RESPONSIBILITIES AND PROCEDURAL FRAMEWORK

Organisational:

Chief Executive, the Chief Operating Officer, Directors and management teams are responsible for:

- ensuring that operational procedures, health, safety, environmental and risk management arrangements are in place to meet legal and policy requirements;
- providing resources for implementing and maintaining legal and policy requirements;

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- reviewing the performance and effectiveness of this policy and related procedures and guidance, and
- effective communication of this policy through the appropriate management structures.

The Waste Management Officer (WMO)

In NHS GGC the role of Waste Management Officer is performed by the Health and Safety Service Manager (Property, Procurement and Facilities Management)

is responsible for:

- ensuring that the Chief Executive, the Chief Operating Officer Directors and management teams are aware of their responsibilities and duties as well as the relevant procedures necessary to implement this policy;
- Providing advice such that practical and workable procedures are in place to deal with all waste streams, which include measures to minimise waste at source;
- Providing advice such that staff have the necessary equipment to ensure that wastes are segregated and packaged appropriately;
- Providing advice such that all staff receive training and that role-specific training is provided to staff with day-to-day responsibilities for the segregation and management of wastes;
- Providing advice to ensure that local site managers are providing secure storage, uplift, recycling and disposal arrangements;
- providing performance reports to site management and collating and completion of eMART returns with respect to waste on behalf of the NHS Board;
- reviewing the effectiveness of this policy across NHS GGC
- Establishing and leading a Waste Management Committee to provide appropriate cross-sector expertise to support, co-ordinate and review operational management and controls.

Departmental/Line Managers are responsible for:

- ensuring that all staff are aware of this policy and are familiar with the procedures applicable to their areas;
- putting into practice local procedures which are designed to reduce the risks associated with the segregation and recycling of materials, and the production, handling and uplift of all wastes through to their final disposal process;
- ensuring that all staff and workers engaged in healthcare and in waste management have adequate information, training, instruction, supervision and support.
- monitoring the effectiveness of procedures and providing feedback and updates as required;
- ensuring that staff receive suitable and effective support following any accidents or incidents relating to waste management activities.
- Reporting any adverse events or near misses related to waste management on DATIX

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

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- taking precautions and reasonable care with regard to their own safety, that of any other persons who may be affected by their actions, and the environment;
- following procedures and safe systems of work that are in place to minimise risk to persons and the environment;
- reporting of all incidents that arise (including near misses) on DATIX;
- attending the appropriate training and instruction, and ensuring practical skills are regularly refreshed, and
- assisting managers with the identification of any risks arising from waste and materials management.

PROTOCOL FRAMEWORK AND LOCAL PROCEDURAL ARRANGEMENTS FOR IMPLEMENTATION

Risk Based Approach

A risk assessment based approach will be taken to identify and put in place controls to minimise harm to human and/or environmental health that may arise from waste management activities. The Waste Management Officer, local Facilities Management and Infection Control Team can provide additional support to local managers on the assessment of local waste management risks.

As a result of risk assessment, all locations where waste arises should have effective control measures in place to manage the identified risk(s). Waste disposal procedures should reflect local requirements. Local managers are responsible for updating and ensuring local procedures reflect current practices and the range of wastes produced.

There are various factors that need to be considered when conducting risk assessment on waste, including:

- infectious or bio hazardous characteristics - with reference to the Control of Substances Hazardous to Health Regulations (COSHH) and the definition of infectious (characteristic H9) in the Special Waste Regulations;
- other hazardous or dangerous characteristics, for example:
 - explosive;
 - oxidising;
 - flammable;
 - irritant;
 - harmful;
 - toxic;
 - carcinogenic;
 - corrosive;
 - toxic for reproduction;
 - mutagenic;
 - produces toxic gas, sensitising or ecotoxic;

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- sharp or cutting edges (broken glass, sharps, other intrusive devices, etc.);
- radioactive substances;
- offensiveness (volume, time and temperature controls);
- exposure pathways throughout the entire waste management chain.

Training

NHS GGC utilises the Waste Management Module found on Learnpro as the primary source of waste management training.

Occurrence recording

All staff are encourage to report any incident of near miss involving the management of wastes via the NHS GGC's incident reporting system, DATIX.

Monitoring arrangements

Local managers are required to monitor and review the effectiveness of local procedural arrangements, risk registers and incident analysis.

To assist in the monitoring arrangements a waste management audit tool will be developed.

Procedural Guidance

NHS GGC fully adopts the SHTN3 – NHS Scotland Waste Management Guidance 2016.

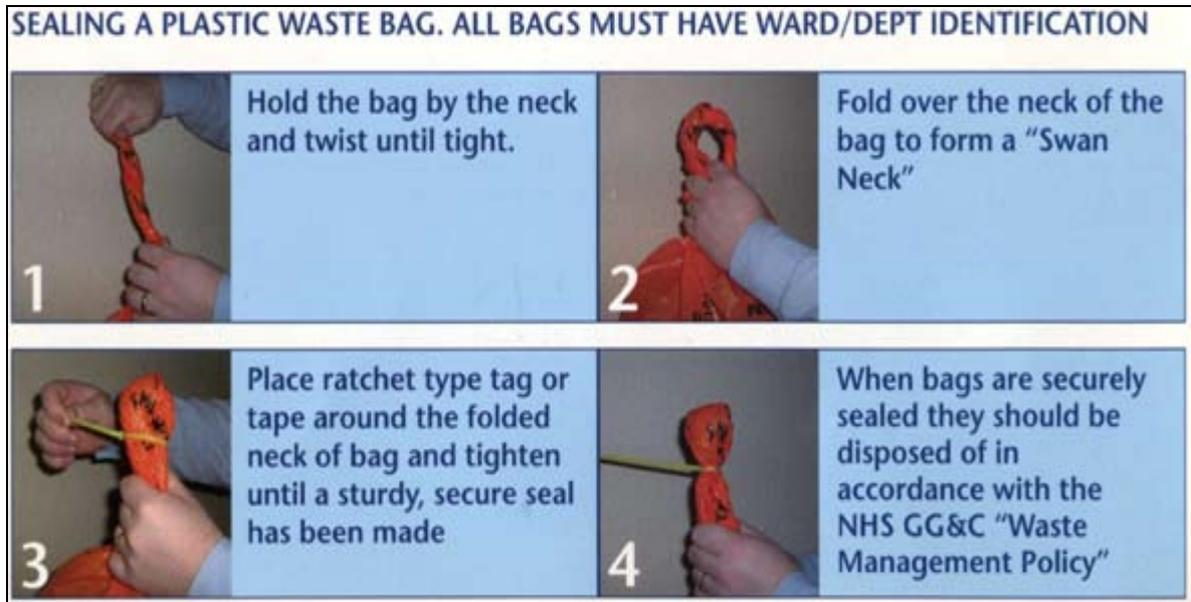
- Part A Summary of requirements - best practice overview
- Part B Waste Management Policy Template
- Part C Compendium of Regulatory Requirements
- [Part D Guidance and Example text for Waste Procedures](#)
- [Segregation and Handling of Healthcare Waste Chart](#)

Where managers or staff require further advice or clarification of interpretation of Part D Guidance, this should be sought from local site Facilities Management or the Waste Management Officer.

Review: This policy will be reviewed in 12 months

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Approved Method for sealing waste bags "Swan Necking"



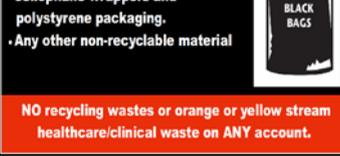
Swan necking requires that the bag is not over filled. If it can't be swan necked then it is over filled.

Once swan necked, the bag can be carried in the appropriate manner by staff. The neck gives a good handle and allows for the bag to be carried away from the body, minimising risk of needle stick injury, should anything have been inappropriately disposed of.

[Internal Safety Action Notice ISN/2016/003 applies](#)

Appendix 1

Waste Bin Labels:

Pecos Code	Waste Labels	
Recycling Only Waste Labels		
SLP6166/RP	200x150mm	
Dry Mixed Recycling Waste Labels		
SLP6166/RD	200x150mm	
Residual Waste - Black Bag Waste Labels		
SLP6165/B	148x105mm	
SLP6166/B	200x150mm	
Orange Clinical Waste Labels		
SLP6165/O	148x105mm	
SLP6166/O	200x150mm	

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Pecos Code		
Clear Bags (Printed)		
198184	BAG CLEAR PRINTED 400 X 660 X 990MM 30MU	
198191	BAG CLEAR PRINTED 400 X 735 X 990MM 30MU	
198917	BAG CLEAR PRINTED 280 X 380 X 610MM 30MU	
Clear Bags (no printing)		
198924	BAG CLEAR 460 X 735 X 900MM 50MU	
198238	BAG CLEAR 460 X 610MM 20MU	
198849	BAG CLEAR 610 X 760MM 25MU	
198856	BAG CLEAR 300 X 460MM 25MU	
198863	BAG CLEAR 250 X 300MM 25MU	
198245	BAG CLEAR 610 X 920MM 25MU	
198870	BAG CLEAR 610 X 460MM 25MU	
198931	BAG CLEAR 920MM X 960MM 30 MU	
Black Bags (Printed)		
198177	BAG BLACK PRINTED 400 X 735 X 990MM 30MU	
198825	BAG BLACK PRINTED 280 X 380 X 610MM 30MU	
198832	BAG BLACK PRINTED 400 X 660 X 990MM 30MU	
Orange Bags Clinical Waste (Printed)		
198801	BAG ORANGE CLINICAL WASTE 200 X 380 X 610MM 5KG, 20 MU	
198818	BAG ORANGE CLINICAL WASTE 250 x 460 X 610MM 5KG, 20 MU	
198139	BAG ORANGE CLINICAL WASTE 385 X 760 X 990MM 8KG, 25 MU	

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198146	BAG ORANGE CLINICAL WASTE 325 X 660 X 990MM 8KG, 25 MU	
198153	BAG ORANGE CLINICAL WASTE 406 X 762 X 990MM 11KG, 45 MU	
198160	BAG ORANGE CLINICAL WASTE 380 X 660 X 990MM 11KG, 45 MU	
198900	BAG ORANGE CLINICAL WASTE 400 X 660 X 990MM 15KG, 120 MU	
Yellow Bags Clinical Waste (Printed)		
198115	BAG YELLOW CLINICAL WASTE 325X660X990MM 8KG, 25 MU	
198122	BAG YELLOW CLINICAL WASTE 365X711X990MM 10KG, 45 MU	
198894	BAG YELLOW CLINICAL WASTE 400X660X990MM 15KG, 120 MU	
Patient Clothing Bags (Printed)		
198207	BAG WHITE PATIENT CLOTHING PRINTED 610 X 760MM 30MU	
Locker Bags (no Printing)		
198214	ORANGE LOCKER BAG 265 X 430MM + 40MM 15MU	
198221	YELLOW LOCKER BAG 265 X 430MM + 40MM 15MU	
Colour Bags (No Printed)		
198252	BAG BLUE 400 X 635 X 990MM 40MU	
198269	BAG BROWN (LARGE) 400 X 635 X 990MM 30MU	
200771	BAG BROWN (SMALL) 280 X 360 X 600MM 30MU	
198887	BAG BLACK GP 460 X 735 X 990MM 30MU	

Tracer Labels:

61802	Hospital Wastes Tracer	
By law, this label must be COMPLETED and FIXED to all black and yellow waste bags and sharps containers before uplift.		
THIS TASK IS THE RESPONSIBILITY OF STAFF IN THE WARD/DEPT WHICH PRODUCES THE WASTE.		
PORTERING STAFF WILL NOT UPLIFT WASTE WHICH IS NOT LABELLED.		
HOSPITAL.....		
WARD/DEPT.....		

80x150mm PECOS CODE: [SLP4357](#)

Bag Ties

TIE CABLE BLACK 4.8MM X 200MM - [084463](#)

TIE STANDARD YELLOW CLINICAL WASTE BAG - [144211](#)