



Disposal of Waste

Duty of Care

All chiroprody and podiatry practices have a duty to ensure that any waste you produce is handled safely and in accordance with the law. This is referred to as a Duty of Care.

Under the Duty of Care regulations you can only legally give your waste to disposal contractors registered with the Environment Agency, the Scottish Environmental Protection Agency or Environment and Heritage Service (Northern Ireland). Failure to do so is a criminal offence and can be very costly if it ends up in court.

Types of waste

Most chiroprody and podiatry practices will produce four types of waste, that should be handled and disposed of separately, and they are;

1. Commercial waste
The kind of waste normally associated with the running of a business, for example old supplies catalogues, telephone directories, etc. This is likely to be very small volumes.
2. Confidential waste
Old case notes from patients not seen for seven years in the case of adults, or after the 25th birthday for persons treated under the age of 18 years. This is likely to be once a year and this waste will need shredding. If you shred the notes yourself then the waste can be regarded as normal commercial waste.
3. Clinical waste
Waste associated with podiatry treatments, such as used gloves, towels and non pathological nail cuttings and callus. This will also now include partially discharged local anaesthetic cartridges and sharps.
4. Hazardous waste
Infectious clinical waste, that is clinical waste believed to contain viable micro-organisms or their toxins that are known or reliably believed to cause disease. It also includes, fluorescent light tubes, computer monitors and pharmaceuticals known to be cytotoxic and cytostatic.

Hazardous Waste Regulations

The Hazardous Waste Regulations require business producing hazardous waste to register with the Environment Agency. However, chiroprody and podiatry practices which generate less than 200kg of hazardous waste in any twelve-month period are exempt, and so do not need to register.

It is possible that clinical waste companies may challenge this view, however, it is you as the producer of the waste that classifies your clinical waste as hazardous or non hazardous.



Storage of Clinical Waste

Clinical and hazardous waste should be kept separate from other commercial waste. Blades, syringes and other sharp objects should be disposed of in a yellow sharp safe box. All other clinical waste, hazardous and non hazardous, should be collected in a yellow plastic sack and the bag should be replaced at the end of the day or when $\frac{3}{4}$ full, whichever ever occurs sooner.

You have a 'duty' to take all reasonable measures to ensure that no un-authorized persons can interfere with clinical waste prior to collection. Ideally clinical waste awaiting collection by the waste disposal contractor should be stored in a locked cupboard.

Notifying the waste to disposal contractors of the type of waste

The use of the European Waste Catalogue numbers on the Waste Transfer Note (see below) or Hazardous Waste Consignment notes to notify the registered carrier, of the status of the waste so that they can ensure the safe management and disposal of the waste, as well as ensuring that you are appropriately charged.

You should use the following European Waste Catalogue numbers on the Waste Transfer Note;

- 0 00 0 00, for ordinary commercial waste
- 1 18 01 01, for unused, out of date and non-infected sharps
- 1 18 01 03, for infected sharps
- 1 18 01 04, for non-infected clinical waste; and
- 1 18 01 03, for hazardous clinical waste.

Keeping your own records

It is essential that you keep a record of your clinical waste transactions, and you may either pay the waste disposal contractor to do this for you, or you can keep a copy of your Waste Transfer Notes, with parts A, B and C completed, see below.

You should keep records for at least two years, so that you can provide them if asked by the Environmental Agency, Waste Collection Authorities or the Scottish Environmental Protection Agency.

Waste Transfer Note

A Waste transfer note is simply a written description of the waste that is passed from one person to another person and is filled in and signed by both persons involved in the transfer.

Normally a standard format is used; see Annex A, the producer of the waste describes the waste in part A, and gives their details in part B. Part C is completed by the person collecting the waste and D by the person or company that finally disposes of, or incinerates the waste.

Who provides the waste transfer note is not important so long as it contains the right information and a copy kept.



Summary action points

You must take all reasonable measures to:

1. Ascertain that your waste disposal contractor is registered with the Environmental Agency, the Scottish Environmental Protection Agency or Environment and Heritage Service (Northern Ireland) and has a current waste management licence and that they are licensed to remove clinical waste. Some licences are valid only for certain kinds of waste or certain activities.
2. Ensure that waste is only transferred to an authorised person and that no other person can interfere with the waste prior to collection.
3. Ensure that the waste being transferred is accompanied by a written description so that anyone receiving it to dispose of may handle it in accordance with their own Duty of Care.
4. Keep a copy of all signed Waste Transfer Notes.



Duty of care: waste transfer note

Section A: Description of waste Please describe:		European Waste Catalogue number: *M1 18 0 *Complete The waste contains <input type="checkbox"/> Clinical waste <input type="checkbox"/> Hazardous waste How is the waste contained <input type="checkbox"/> Sack <input type="checkbox"/> Sharps box <input type="checkbox"/> Other
Section B; Name of Podiatrist and Practice details – transferor Podiatrist: <input checked="" type="checkbox"/> The producer of the waste Name of your unitary authority:		Practice name and address:
Section C: Person collecting the waste – transferee Full name: Name of company: Are you: <input type="checkbox"/> Waste collection authority <input type="checkbox"/> Waste disposal authority (Scotland) <input type="checkbox"/> Authorised for transport purposes		<input type="checkbox"/> The holder of waste disposal licence Licence number: Issued by: <input type="checkbox"/> Registered waste carrier Registration number Issued by
Section D: The transfer - destination Address of transfer or collection point: Date of transfer: Transferor's signature: Name: Representing:		Broker who arranged this transfer if applicable Name: Address: Transferor's signature Name: Representing: