# Annex C – Clinical Waste Management Protocol

**Introduction**

NHS England’s framework agreement sets out consistent standards for the collection and disposal of clinical waste from organisations. The framework identifies several benefits including quality standards, consistency, management of contracts and value for money. Clinical waste can be defined as any waste produced by, and as a consequence of, healthcare activities[[1]](#footnote-1).

At Sheerwater Health Centre the approved contractor is Initial.

**Overview**

Under the [Environmental Protection Act 1990](http://www.legislation.gov.uk/ukpga/1990/43/contents) it is unlawful to deposit, recover or dispose of controlled (including clinical) waste without a waste management licence, contrary to the conditions of a licence or the terms of an exemption, or in a way that causes pollution of the environment or harm to human health[[2]](#footnote-2).

Hazardous healthcare waste is subject to the requirements of the [Hazardous Waste Regulations 2005](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/218704/haz-waste-regs-guide.pdf).

**Aim**

The aim of this protocol is to minimise the risks associated with clinical waste, particularly handling and disposal at Sheerwater Health Centre. Throughout this protocol, the term clinical waste refers to “hazardous waste” generated by organisations.

This protocol is to be read in conjunction with the references in the footnotes and hyperlinks within the document.

**Waste segregation**

Segregation on-site is vital to ensure that waste is stored, transported, and ultimately disposed of in the correct manner to maintain compliance with extant regulations. Clinical waste must be segregated as detailed overleaf.

Refer to the NHS Property Services [poster](https://www.property.nhs.uk/media/2906/disposing-of-clinical-and-non-clinical-waste.pdf) and useful [webinar](https://attendee.gotowebinar.com/recording/1206784791883571983) that further explains the correct disposal of clinical and non-clinical waste and advice upon the following:

* Infectious clinical waste including COVID-19 PPE

You should use the ORANGE bags for infectious clinical waste only. This includes COVID-19 waste and other infectious PPE, dressings, and bandages etc.

These orange clinical waste bags should not be placed in non-clinical areas such as corridors, entrances, staff rooms, kitchens and offices etc. so please only place them in infectious clinical waste areas.

* Infectious clinical waste that is also contaminated by medicines and/or chemicals

You must only put waste items that are both infectious and chemically contaminated (for example some samples and diagnostic kits) in the YELLOW bags.

* Non-infectious clinical waste, including face masks in non-infectious areas

The YELLOW and BLACK striped bags should be used for non-infectious clinical waste, e.g., PPE, couch roll, dressings, plasters, bandages, nappies, feminine hygiene products etc.

* General waste and recycling

Paper hand towels, packaging, cardboard, plastic bottles, tins, and any other waste items that are not clinical or infectious must be disposed of in the BLACK bags (general waste) or CLEAR bags (recycling).

Using the incorrect bag is causing huge issues for the clinical waste industry, resulting in missed collections, and costing the NHS substantial amounts of money. Sending waste for incineration is 45% more expensive than sending waste to be recycled.

**Medicines waste**

[CQC GP Mythbuster 99](https://www.cqc.org.uk/guidance-providers/gps/gp-mythbuster-99-infection-prevention-control-general-practice) advises that following in regard to medicines waste:

* Medicines waste should be stored in a designated bin and collected regularly by an appropriate waste contractor
* Purple topped bins, including sharps bins must be available. This is for the disposal of cytotoxic medicines (which include hormones)
* Staff should be aware which medicines should be disposed of in each bin
* Denaturing kits must be available for the disposal of controlled drugs. There should be a written procedure to govern the process and evidence that dispensary stock-controlled drugs are only disposed of in the presence of an authorised witness
* Labels, prescriptions, and other patient identifiable documents must be treated as confidential waste

Further reading on waste, including segregation can be sought from NHS Property Services [here](https://www.property.nhs.uk/media/3543/nhsps-waste-segregation-update_summer-2021.pdf). Waste segregation posters can be [downloaded here](https://www.property.nhs.uk/media/2689/waste-segregation-posters.pdf).

**Handling of waste**

Clinical waste is classed as hazardous material and must therefore be handled and disposed of in a safe manner, to ensure that personnel are not injured or exposed to contamination.

All personnel, when involved in the handling of clinical waste, should use the correct PPE; it is essential that staff have received IPC training before handling clinical waste. The minimum PPE requirements when handling clinical waste are gloves and an apron. Clinical waste bins must be emptied daily, and bags must not be filled more than three quarters full.

Waste must be taken to a designated location and placed in the correct receptacle whilst awaiting collection from Initial UK. Access to this area is for authorised personnel only; all staff must ensure that they secure the area when leaving. If this area is inaccessible, Nine Taylor (Practice Manager) is to be informed and alternative arrangements made for the safe storage of the clinical waste.

**Collection**

All clinical waste will be collected by Initial UK weekly on a designated day of the week and is to be supported with a [Waste Transfer Note](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/311081/LIT_7932.pdf) (WTN). Copies are to be retained by the Nine Taylor, the Practice Manager to evidence the correct and authorised removal of waste from the site. Hazardous waste requires a [consignment note](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/512167/LIT_6872.pdf) (provided by the contractor) which must be retained for audit purposes.

**Summary**

All staff have a duty of care to ensure that waste is correctly segregated. Compliance with this protocol and the references within it will ensure the safe and effective management of waste at Sheerwater Health Centre. Any questions relating to this protocol are to be directed to Wendy Mayne (Practice Nurse) or Nine Taylor (Practice Manager).

1. [NICE Guidance](https://www.nice.org.uk/guidance/cg139/chapter/1-guidance) [↑](#footnote-ref-1)
2. [Guidance on the correct disposal of potentially hazardous clinical waste](https://www.gov.uk/guidance/healthcare-waste) [↑](#footnote-ref-2)