



**The Anenta guide to
managing waste
in GP surgeries**

**Effective management of
healthcare, clinical and
pharmaceutical waste**

Anenta understands the challenges that regulatory requirements place on GP surgeries. Where clinical waste is concerned, this affects space utilisation, resource management and staff training.

So, to assist you with compliance and management of clinical waste, we have developed this simple guide, which is designed to help all healthcare locations and GP surgeries manage their waste.

The guide also clarifies the collection service arrangements procured by your NHS Commissioner.

Overview

This guide covers the management of all relevant waste streams, with a specific focus on items generated through clinical activity.

It outlines interactions with other waste streams and the impact that has on the proper management of waste.

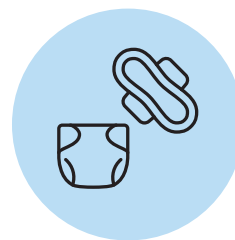
It gives guidance on the need to manage waste that includes:



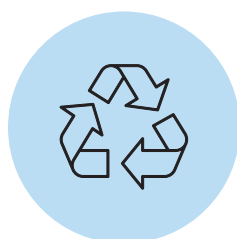
sharps



potentially
infection waste



offensive waste



domestic waste
or recycling



cytotoxic and
cytostatic waste



pharmaceutical or
medicinal waste

Contents

The guide is broken down into:

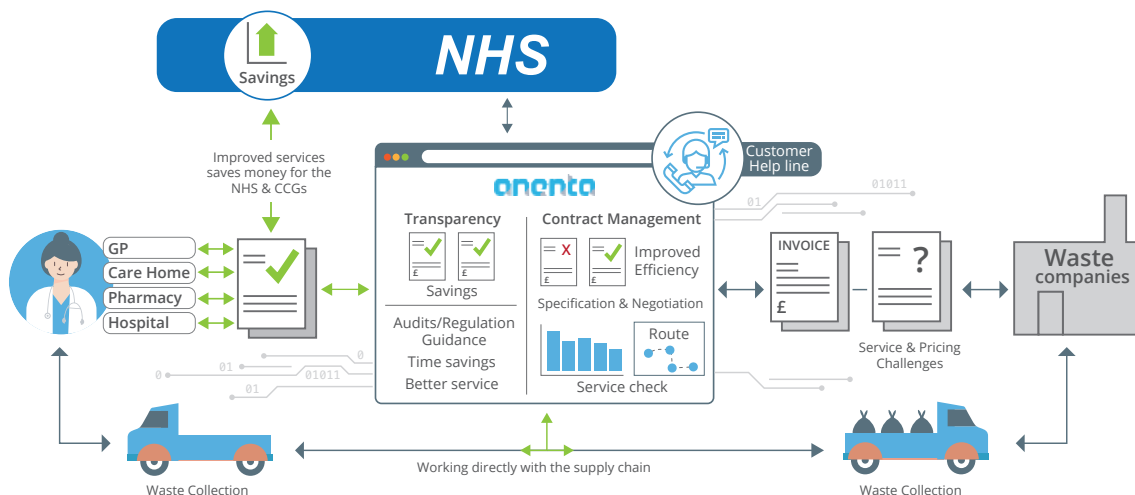
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Who is Anenta?

If you are not already familiar with Anenta, we are the Managing Agent acting on behalf of NHSE&I and CCGs/ICSSs. We ensure the proper and effective management of healthcare, clinical and pharmaceutical waste.

We do not physically collect waste ourselves but instead manage the NHS commissioned contract relevant to your area, acting as the interface between you and your waste collection provider to ensure a high quality of service and value for money.

In short, we manage all aspects of healthcare, clinical and pharmaceutical waste that your surgery/practice generates; from operational management of your service queries, such as missed collections, to additional deliveries or frequency changes. All queries are logged and stored within your dedicated Anenta account.



Should you require additional information on our service please call **03301 222 143**
To access your online account and log on please go to: <https://vector.anenta.com>

Your duties

All organisations and staff responsible for producing healthcare waste, including primary care providers, GPs and pharmacies, have a duty to dispose of their waste appropriately and in accordance with the Environmental Protection Act 1990.

This guide will give you the tools that you'll need to create and put into place an appropriate Waste Management Policy.

This will not only guide staff, but it will help to ensure that you are meeting your statutory obligations – including the completion of clinical waste pre-acceptance audits, without which hazardous waste including healthcare items, cannot legally be removed from site.

This guide outlines:

- what you will need to consider/understand
- who should do what?
- your responsibilities
- understanding and creating a successful Waste Management Policy
- services provided to you.

Designated responsibility

To put a successful Waste Management Policy in place, you will need a designated, named individual that has an understanding of waste management and a responsibility for this role. This individual should take a lead and manage waste queries from all staff, and should be the named representative in your Waste Management Policy.

What does your designated waste manager need to know?

Whoever takes responsibility for managing waste produced on site needs to have a clear understanding of the relevant guidance held within:

- **HTM0701 – Health Technical Memorandum***
- **Healthcare Waste Appropriate Measures for Permitted Facilities**

They will also need a good knowledge of the site's Waste Management Policy.

*Currently under consultation.



Waste Management Policy

All healthcare settings need to have a Waste Management Policy. This is not an environmental statement. Instead, it is a policy that specifically states how the site manages its waste.

Successfully put into place, a good Waste Management Policy will:

- enable compliance with your regulatory duties
- create waste management efficiency
- deliver appropriate segregation of waste
- ensure that all staff are appropriately trained in the waste types produced on site and how to dispose of them.





How do I create a fully compliant Waste Management Policy?

For guidance on putting an appropriate Waste Management Policy into place, you can either refer to the Health Technical Memorandum, or you can contact Anenta for advice.

Ideally, your Waste Management Policy should be one adopted centrally across your CCG/ICS or one that has been developed nationally. Following this path will save you time.

As a guideline, your Waste Management Policy should detail:

- all waste types generated on site
- training delivered and in what format – be that electronically, face-to-face, or through the provision of a procedure document.

Once produced, the Waste Management Policy needs to be:

- **understood** by all staff at all times
- **available** at induction and at all subsequent waste training session
- **reviewed** annually, in line with duty of care auditing.



Waste Management training

Training should be simple and straightforward. As a guideline, this training should take around 15 minutes to deliver.

It should:

- set out all the waste streams generated at the site
- provide clear guidance on waste segregation; detailing which type of waste can be disposed of in which waste container
- incorporate infection prevention and control measures
- include training to prevent needle stick injuries and the management of needle stick injuries, should they occur
- outline safe waste-handling techniques when moving waste around the premises/site, be that:
 - moving a tray containing waste items to be disposed of in a waste bag or sharps container
 - moving a sealed waste container to a central waste disposal/collection point.



Administrative compliance

To remain compliant with healthcare and clinical waste requirements:

- Hazardous Waste Consignment Notes (HWCN), concerning transport of hazardous waste, needs to be retained for a minimum of 3 years, and available to the Environment Agency should they request it
- Waste Transfer Notes (WTN), which concern transport of non-hazardous waste including black bag waste, sanitary waste or recycling waste, need to be retained for a minimum of 2 years.

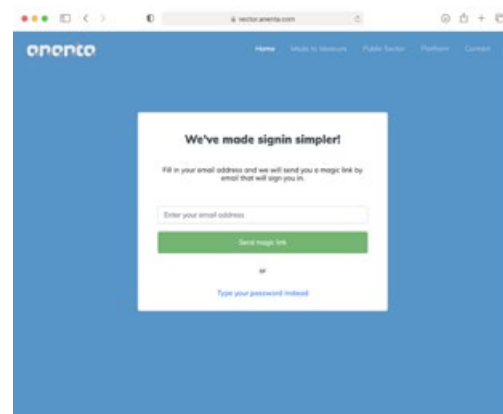
These documents can be stored as paper versions or electronically on your Anenta account, but must be filed and accessible for review in order that your healthcare setting complies with waste management regulations. This should be accessed via your Anenta account.

Segregation

Segregation of waste is critically important.

This is the process which ensures that waste is disposed of in the appropriate manner.

Waste items categorised as low risk should not be disposed of in high-risk waste collection receptacles. For example, recyclable items should not be placed in sharps containers. Content from these containers is incinerated, and cannot be recycled.



Your legal responsibilities

It is your legal responsibility to ensure that different types of waste are segregated and therefore disposed of correctly, in order that your surgery conforms with the Environmental Protection Act 1990, and any other related statutory instruments and guidance.

Training plays a key part in helping your organisation comply with this regulation.

This will help to ensure that your staff fully understand what waste is appropriate for which disposal type.

As part of this process, clear signage must be in place to enable all individuals to assess what waste should go into which container. This includes, for example, not placing food waste into a clinical waste bag.



External waste storage protocols

As a producer of healthcare and clinical waste, if waste is stored externally (including bags or containers housing domestic waste or recycling waste), it **must not** be accessible by the public.

All external waste containers must be lockable and kept locked at all times. Ideally, external waste containers should be held in a separate lockable waste compound.

Why is keeping bins locked important – even in a locked compound?

By keeping bins locked, you not only reduce the risk of waste being accessed by non-staff members, but you also enhance the likelihood that staff will put the appropriate waste in the correct container type externally. Staff who have to unlock a container are more likely dispose of the waste type correctly.

All of the above are assessed in a Duty of Care audit. The audit itself drives successful waste management. By conforming to all the above you will have created a successful Waste Management Policy by default.



Knowing your waste

Under the clinical and healthcare waste service provided to you, NHSE&I will provide consumable items for the collection of healthcare waste, as follows:



Known or infectious waste
(Orange) bags for soft
clinical waste



Offensive waste bags (Yellow/
Black Stripe) where appropriately
assessed for use



Sharps containers
(yellow, orange and purple
lidded)



Pharmaceutical waste containers
for out-of-date stock, such as
vaccine ampoules

NHSE&I is **NOT** responsible for the following:

- X** general and recycling waste
- X** confidential waste
- X** sanitary waste
- X** WEEE (Waste Electrical and Electronic Equipment).

Depending on your local Authority, NHSE&I may be responsible for provision of internal containment (internal infrastructure) such as sack holders, sharps container wall brackets etc but it is your duty to check if this is not the case.

Your surgery will need to make its own arrangements for the disposal/collection of any of the above waste types or procure containment not covered by NHSE&I, as is needed. For advice and assistance on what containment to order please get in touch with Anenta.

It is the responsibility of the waste producer (your surgery) to ensure that all healthcare waste is appropriately packaged and sealed and made available for collection from a single accessible point. The services procured by NHSE&I for the collection and disposal of healthcare waste does not extend to servicing companies acting as domestic staff to package and remove waste from individual consulting rooms.

Labels are pre-printed on sharps containers, however tie-tags for bags are not provided under the existing service contracts. These should be sourced privately. This meets requirements for waste traceability and tracking.

The employer, by way of the provision of waste management policies and procedures, should provide training for the handling of the clinical waste.



Clinical Waste and Offensive Waste explained

'Clinical Waste' and 'Offensive waste' are defined in the Controlled Waste (England and Wales) Regulations 2012, as amended.

Infectious 'Clinical Waste' is healthcare waste that:

- should be disposed of in orange bags
- contains viable micro-organisms or their toxins which are known or reliably believed to cause disease in humans or other living organisms
- contains or is contaminated with a medicine that contains a biologically active pharmaceutical agent
- is a sharp, or a bodily fluid or other biological material (including human and animal tissue) containing or contaminated with hazardous substance
- is waste of a similar nature from a non-healthcare activity.

Typically, clinical waste generated within primary care is a result of treatment of patients who present in many cases with no infections although requiring some form of treatment. This means the use of the offensive waste disposal stream is preferred.

Details related to the criterion for Category A and B infections can be found within the HTM0701 document.

The consumable containment provided by the servicing contractor on behalf of NHSE&I eg bags and sharps containment, meets the requirements for transportation of this waste type under road transport regulation (ADR), specifically UN3291 Clinical Waste, Unspecified, N.O.S.

Non-infectious 'Offensive waste' is healthcare waste that:

- should be disposed of in yellow bags with black stripes
- is not clinical waste
- contains body fluids, secretions or excretions
- falls within waste code **18 01 04**, **18 02 04** or **20 01 99**.

The use of tiger bags (yellow bag with black stripe) is fully endorsed; however you must ensure that appropriate assessment of the waste produced conforms to this waste type.

Specifically, this waste type (offensive) must not contain any waste, which has or is known to contain any infectious substances.



Containers

Evidence shows that through the implementation of effective training and waste management policies and procedures, consumable items such as sharps and bags are used to their full capacity. As a result, NHSE&I, along with the Managing Agent Anenta Ltd, have made available certain sizes of sharps containers to maximise the use of capacity. As such 1L sharps containers have been removed from the list of available containers, as the cost of transport and disposal of a single container is prohibitive to sustainable management.

The list of containment and associated sizes are available for you to view within your vector.anenta.com account along with supporting information such as documentation, service dates and the ability for you to raise issues or simply ask for some guidance.

All operational queries must be raised with Anenta Ltd via your account or by contacting the team on 03301 222 143. Should you contact the waste disposal contractor directly, they have been instructed not to act but to refer you to Anenta Ltd.

The above is in place to ensure that all queries and requests are logged and managed to effect resolution, thus improving the quality of service you receive.

Patient returns

- **Pharmacies are obliged to accept unwanted medicines from patients. As such GPs should advise patients to follow this disposal pathway. Patients do not have to return waste to the specific pharmacy that dispensed the medication.**
- **Local Authorities are responsible for the collection and disposal of sharps generated through self-medication such as Type 1 diabetic sharps disposal.**
- **Services are available for waste generated through substance misuse. These are typically commissioned through Local Authority Public Health known as Needle Exchange (NEX). Specific pharmacies within boroughs are commissioned to accept such waste, however the availability of lists of participating pharmacies varies from borough to borough.**

Hazardous Waste Consignment Notes and Waste Transfer Notes

Hazardous Waste Consignment Notes (HWCN)

HWCNs are a document requirement when transferring hazardous waste from one entity to another to ensure there is a traceability of the waste when moved from any premises.

This document must be kept for a minimum of 3 years and be signed by the consignee and the consignor.

As a result of Covid 19, the Environment Agency (EA) issued RPS C8 (Regulatory Position Statement) which allows for the consignor to forgo obtaining a signature due to social distancing purposes.

This will be updated in due course as the RPS is lifted. Further information is available through the link below:

[social-distancing-when-signing-and-handing-over-waste-transfer-and-consignment-notes-in-person](#)

Anenta has received a large number of HWCNs which are being processed into each location's Anenta account, accessible by logging into <https://vector.anenta.com/>

Waste Transfer Notes (WTN)

WTNs are required for transferring non-hazardous waste, including patient returns and out-of-date pharmaceutical stock or municipal waste such as black bags and recycling. On behalf of NHSE&I, Anenta is only involved in the management of patient returns and out-of-date pharmaceutical stock with respect to the contracts procured.

RPS C8 is equally applicable to this waste type, valid until 31 March 2022.





Collection dates and frequency

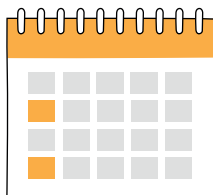
Your Anenta account will show you when your next collection date is, based on the service frequency. Each month the servicing contractor will supply Anenta with the most up-to-date information of the planned collection for the following month.

Please note the following potential variations:

1. The servicing contractor can change the day of collection to ensure efficient routing of vehicles. Where this occurs the contractor will inform Anenta of all affected premises and Anenta will log this within your Anenta account and make you aware of the change.
2. We ask that you contact Anenta immediately should you believe that a collection has been missed. Anenta will manage the matter from this point to get resolution.
3. You are able to request collection frequency changes and addition containment stock from within your Anenta account. Anenta will confirm acceptance of these changes once conveyed to the servicing contractor.

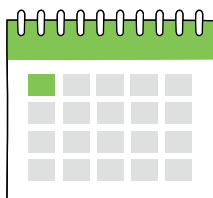
Collection frequencies are listed as follows for the avoidance of doubt:

Weekly Collections will occur weekly and should be expected to be the same day of each week.



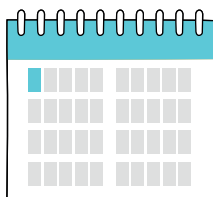
Fortnightly

Collections will occur every two weeks and should be roughly on the same day on each collection.



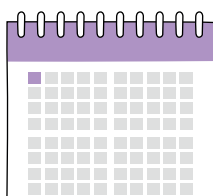
Monthly

Collections will be conducted in 4-week intervals. The date of this collection can vary slight but by no more than 2-3 days.



8 Weekly

Collections will occur every 8 weeks. The date of this collection can vary slight but by no more than 2-3 days.



Quarterly

Collections will occur every 12 weeks. The date of this collection can vary slight but by no more than 2-3 days.

Collection queries

Where missed or adhoc collections are identified the following three principles come into effect:

Principle	Reason	Contractor Action
Missed collection	Contractor has failed to attend as planned ▶	Conduct recollection within 24 hours (1 Day)
Missed collection	Contractor has not been able to access the waste ▶	Conduct recollection within 48 hours (2 days)
Ad hoc collection request	Extraordinary circumstances ▶	Conduct collection within 48 hours (2 Days)

What is Vector?

Vector is Anenta's proprietary online waste management platform, which enables us to provide a bespoke service to you and other clients across the UK, managing collections from thousands of locations, every year.

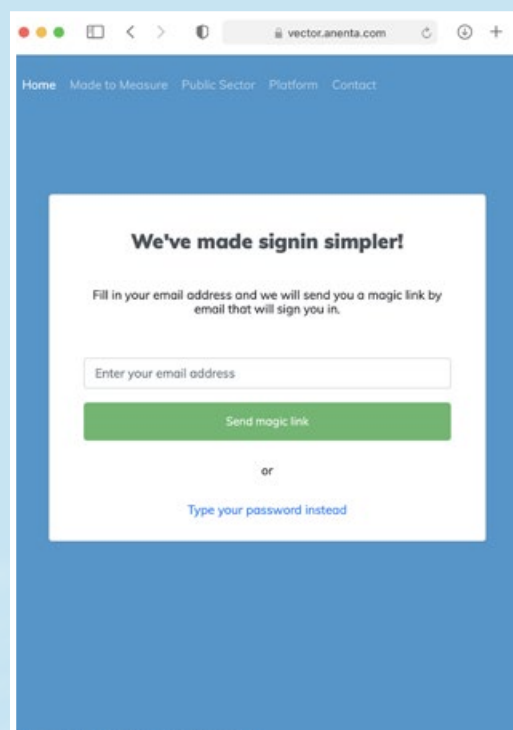
Vector uses cutting-edge, real-time smart technology to enhance efficiencies. Handling everything from irregularities and overbilling, to aiding clients with complex waste and pre-acceptance audits, Vector brings clients, suppliers and other stakeholders to a single point of unified management with complete transparency.

How do I access Vector?

If you don't already have an account, you will need to complete the NHS registration form [here](#).

Once registered, you will be given access to your Vector account. Simply click on the link sent to you in your email which will take you to the login page.

Using the email address submitted during registration as your username, click the '[send a magic link](#)' button and a unique link will be emailed to you. This will take you directly into your Vector account. Magic links are used instead of a password and can only be sent to the registered email address on the account. This removes the need for password management and is highly secure.



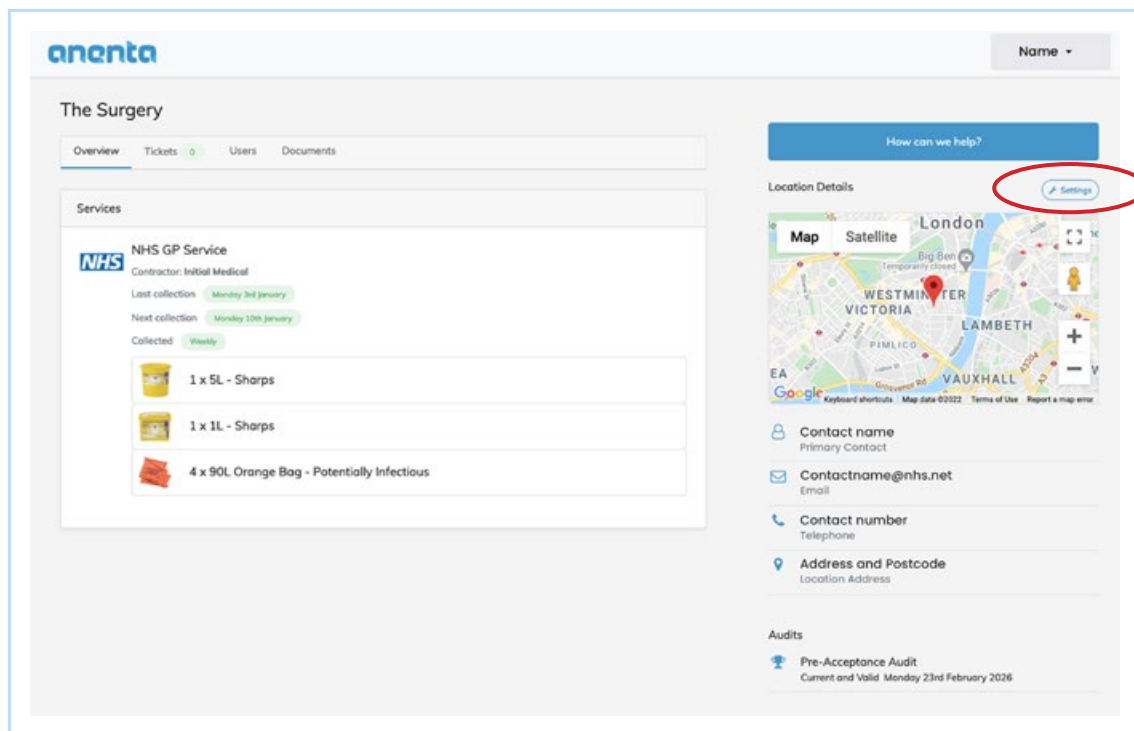
How do I use Vector?

Once your account has been set up and you have accessed it using the magic link, you will be able to see your home page with details of the waste types that Anenta manages on your behalf.

On your home page, you have the ability to amend your location details by clicking the blue **'Setting'** button ringed in red.

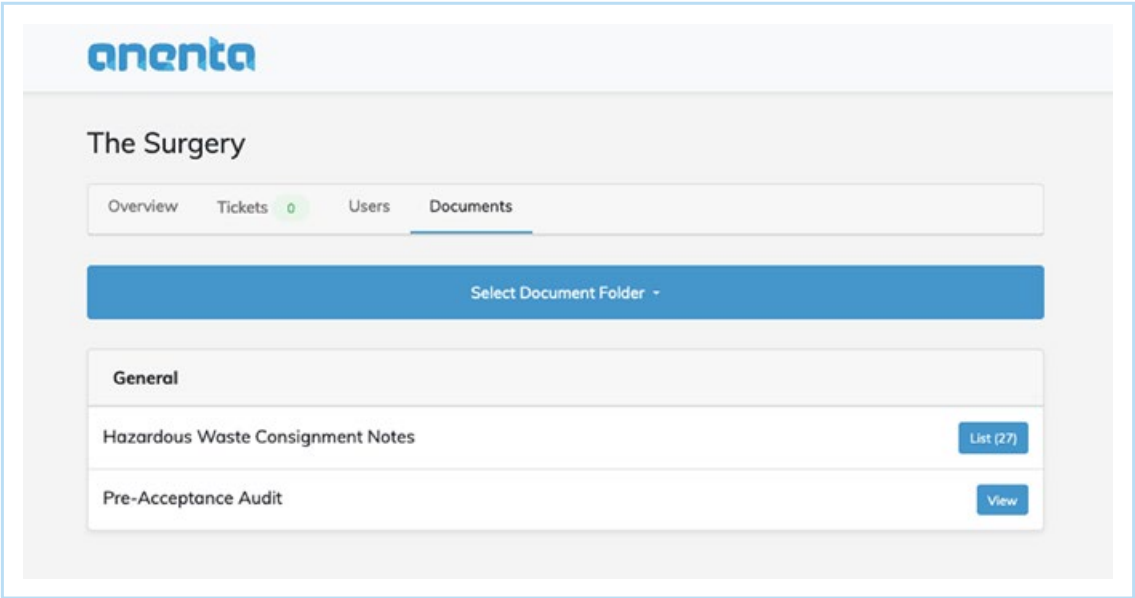
This sits below (the large blue **How can we help?** button).

The Overview section gives details about the items and quantities of waste collected including the last and next collection date as provided by the incumbent waste contractor. This section also details the collection frequency and relevant collection contractor name.

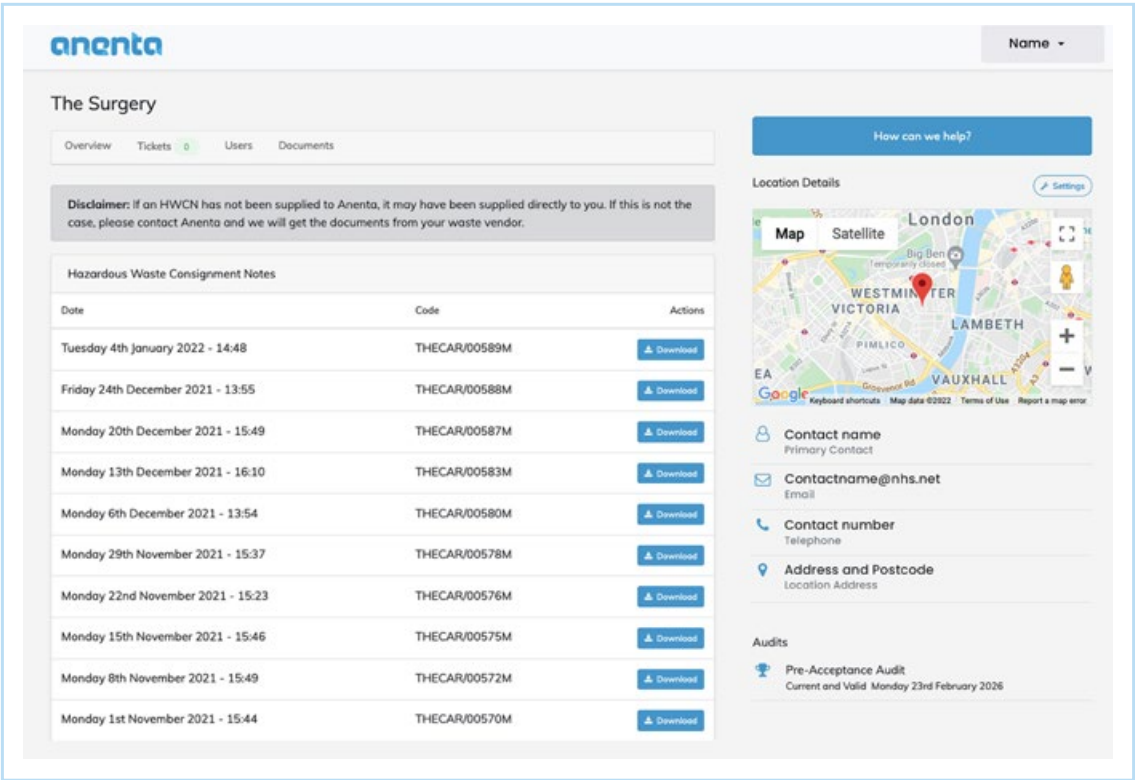


Within the documents section, you will find your compliance documentation and all collateral that relates to your waste management, of which this service guide is part.

By clicking on the Hazardous Waste Consignment Notes blue **'list'** button you will bring up details of all previous notes.

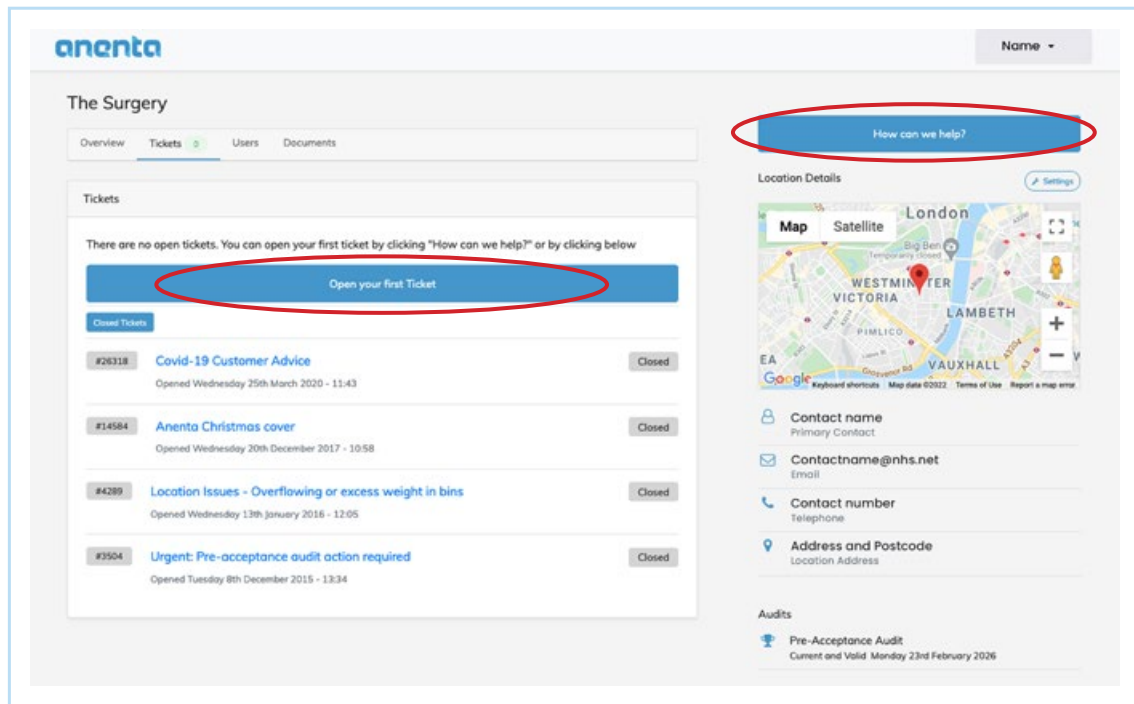


Here, you can download previous Hazardous Waste Consignment Notes.

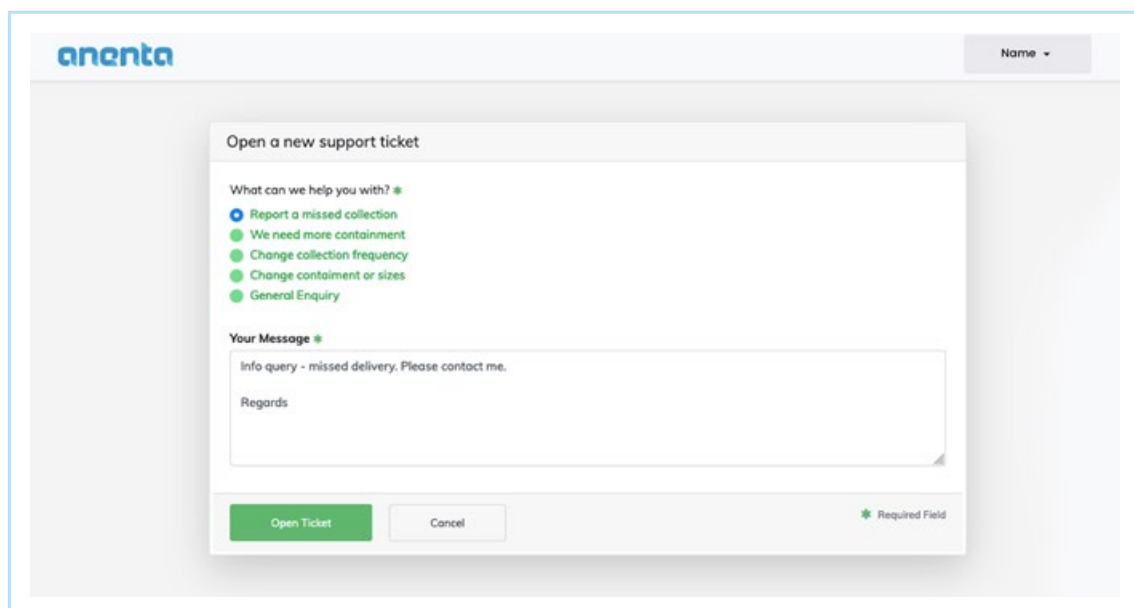


Opening tickets

You can open service tickets by clicking on the big blue **'How can we help'** button on the right-hand side of the screen, or by using the long blue **'Open your first Ticket'** bar. Vector tracks all requests and keeps an auditable trail for future reference. Tickets that have been addressed are shown as closed.



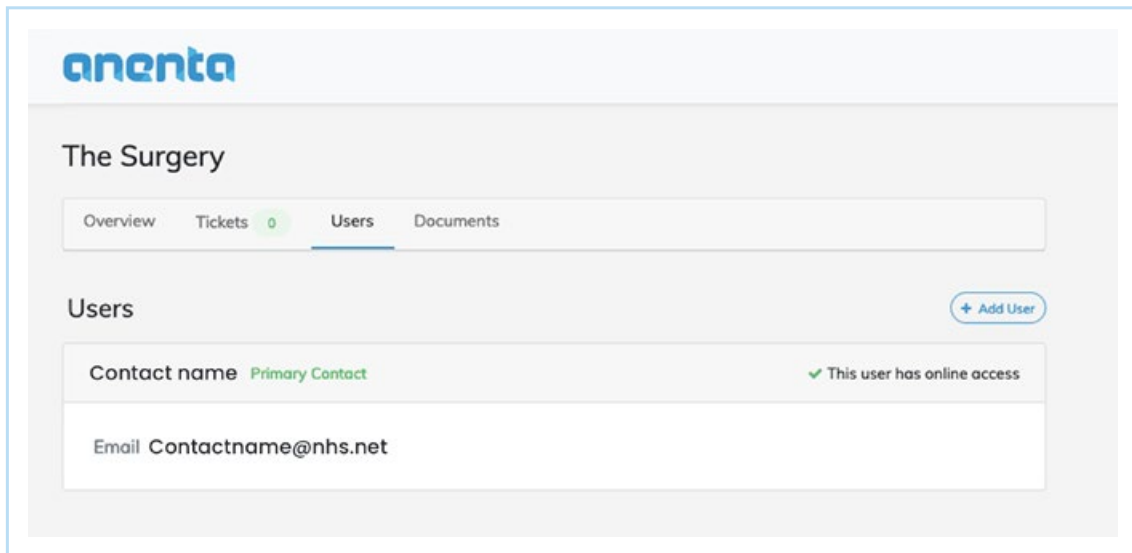
By opening a ticket, you will see the following screen:



Simply click on the relevant option and/or include a message that our team can follow up on your behalf.

Adding users

You have the option of adding users by clicking on the Users section in the toolbar. Simply click the **'add user'** button and fill out the relevant details.



The screenshot shows the Anenta interface for 'The Surgery'. At the top, the Anenta logo is on the left, and the title 'The Surgery' is in the center. Below the title is a navigation bar with four tabs: 'Overview', 'Tickets' (with a green circle and the number '0'), 'Users' (which is underlined), and 'Documents'. Below the navigation bar is a section titled 'Users'. On the right side of this section is a blue button with a plus sign and the text '+ Add User'. Below the 'Users' title is a form with two input fields. The first field is labeled 'Contact name' and contains the text 'Primary Contact'. To the right of this field is a green checkmark followed by the text 'This user has online access'. The second field is labeled 'Email' and contains the text 'Contactname@nhs.net'.

Further assistance?

For further guidance with your Anenta Vector Account in the healthcare setting please contact Anenta on **03301 222 143** or open a service ticket in your Anenta account.

Glossary of terms

'Medicine' is a drug or other preparation for the treatment or prevention of disease. Medicines may also include diagnostic agents.

'Cytotoxic and cytostatic medicine' is a medicine which possess hazardous properties which are carcinogenic, mutagenic or toxic for reproduction.

A **'sharp'** is an item that could cause cuts or puncture wounds. This includes needles, hypodermic needles, scalpels and other blades, knives, infusion sets, saws, broken glass and nails.



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**Effective management of
healthcare, clinical and
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