edoc

electronic duty of care

The new way to record waste transfers

edoc: how data is controlled and protected

Purpose

To describe the information a potential user of the edoc system must supply and how it is accessed, used and stored.

This document explains how edoc will:

- protect and control access to waste transfer data
- aggregate and report on waste transfer data
- anonymise waste transfer data and prevent inference from it

Further information on the functionality of the edoc system is available as frequently asked questions (FAQ) on the edoc website.

1. Introduction

1.1 Key principles of edoc

1.1.1 Equivalency to paper waste transfer notes

The edoc system will provide equivalency to the paper-based system of waste transfer notes in terms of access to the data and how it is protected.

The information you must complete on a waste transfer note is the same in edoc as on a paper waste transfer note.

However, edoc also includes several optional fields. You do not have to complete these, but the more information you record on edoc the more helpful it can be to you, particularly when generating reports.

Some optional fields allow you to use extra features of edoc, for example tracking.

1.1.2 Simple to complete waste transfer notes

edoc will help ensure that data entered and stored on the system is accurate, complete and relevant.

edoc will guide a business to successfully complete a waste transfer note.

Mandatory information for the country of transfer is enforced. edoc helps you to find and provide the correct value for waste codes (EWC) and SIC code. The system also makes other checks for unusual quantities of waste.

Other businesses will be able to discover your business name, addresses and permits / licences / exemptions. This ensures your details are provided in a consistent way when completing a waste transfer note.

1.1.3 Protect against unauthorised access

edoc will only disclose the stored data to those who are authorised to have it.

The use of specific roles within edoc will control and limit who can carry out certain activities. Users will not be able to access data unless they hold an appropriate role.

Your business will control which roles it assigns to its users. Some roles are further restricted and a user will only be granted the role following full checks by edoc's system custodian.

1.1.4 Prevent the disclosure of commercially sensitive data

The benefits of edoc rely not only on the storage of waste transfer notes but extracting information from them and being able to share this appropriately.

Waste transfer notes will be used for aggregation and reporting but edoc will anonymise and cleanse waste transfer data to prevent the inference of sensitive data.

Some trusted organisations, for example Defra, WRAP, Environment Agency, will have improved access to the data, but again it will be anonymised.

1.1.5 Restrict the access of a waste regulator

A waste regulator can use edoc for regulatory purposes if they wish to see a business's waste transfer notes.

edoc still follows the existing procedure for this in that a business has seven full days to respond to a request or notification from an officer of a relevant waste regulator.

A regulatory officer cannot obtain visibility of a business's waste transfer notes on edoc without the permission of the business.

1.1.6 Ensure system availability

edoc has been developed as a robust and secure system. It has been independently accredited by information security consultants and is backed by 24 hours a day, seven days a week technical support.

2.   What data is stored?

2.1   Business information

To register with edoc you must supply details about your business and details about a user who will manage your account in edoc - known as a business administrator.

To keep registration simple, edoc only asks for the details of one of your business sites. Other sites within your business can be added following registration.

Your business administrator will be able to create edoc accounts for other users within your business.

2.2   Waste transfer notes

A waste transfer note must be completed, signed and kept by all businesses involved in the transfer of non-hazardous waste.

edoc mandates that you supply the same information that you currently do on a paper waste transfer note.

You can provide optional information should you wish to use some of edoc's more advance features, for example tracking.

2.3   Reports

You can create reports from the waste transfer notes currently available on edoc.

The information you supply may be included in reports that are shared with other businesses, but edoc will anonymise and cleanse this data to prevent the inference of sensitive data.

Some trusted organisations, for example Defra, WRAP, Environment Agency, will have improved access to data, but again it will be anonymised.

3. Who can access data?

3.1 Business information, waste transfer notes and reports

A user of edoc will have one (or more) roles assigned to their user account. The way a user can interact with edoc, in particular what data they can access, is dependent on their roles (Figure 1).

Available roles are:

- business administrator
- transfer manager
- business reporter
- edoc all waste reporter
- regulatory administrator
- regulatory officer
- data analyst
- data quality manager
- system custodian

The roles a user may hold will depend on whether the user works for a business involved in the transfer of waste, or an organisation interested in the transfer of waste.

A role associated with an organisation interested in the transfer of waste can only be added by edoc's system custodian following successful checks.

Only your business administrator (a user within your business with the business administrator role) can modify the business information you have supplied to edoc.

Only your business administrator has visibility of edoc users within your business. Your business administrators control the roles that are appropriate for each of the users within your business.

Other businesses will be able to discover your business name, addresses and environmental permits, licences or exemptions.
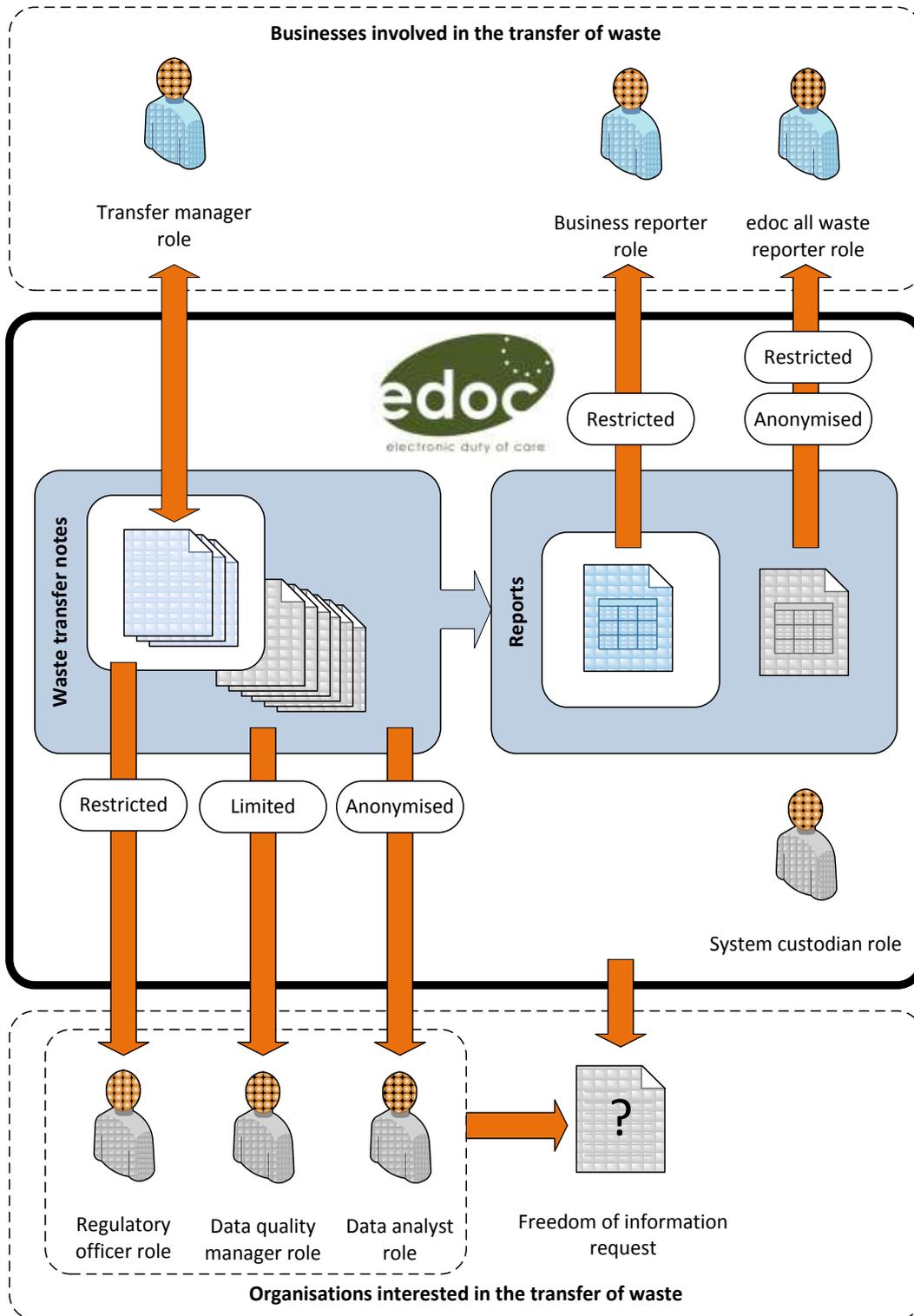
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Figure 1: Flow of data into and from edoc

3.1.1 Businesses involved in the transfer of waste

Transfer manager role

Only users with the transfer manager role can view, create, update and export waste transfer notes.

A transfer manager for any one of the businesses involved in a transfer (transferor, transferee, broker or dealer) can draft a waste transfer note.

When a transfer manager submits a draft waste transfer note, edoc will validate its contents using the rules that apply for the country of transfer.

If validation is successful, edoc tries to link each business listed on the waste transfer note to a business registered on edoc. The transfer note is only shared with transfer managers of businesses successfully linked to the waste transfer note.

When both the transferor (the current holder of the waste) and the transferee (person receiving the waste) have signed the waste transfer note, the note is agreed and it will be stored.

Once shared, transfer managers of businesses involved in the transfer can make corrections to the waste transfer note. A history is available of all revisions made to a waste transfer note.

Transfer managers of businesses involved in a transfer can export the waste transfer note, for example as a PDF.

Business reporter role

The business reporter role can create and export reports on the waste transfers that their business has been involved in.

The waste transfer notes that contribute to these reports can be **restricted** by the businesses that created them. A business can enable and manage a list of businesses that can report against the future waste transfer notes they create – known as their reporting whitelist. Only business reporters for businesses that are involved in the transfer, and are included in the creator of the waste transfer note reporting whitelist will be able to report against the waste transfer note.

Once a business has reporting rights for a waste transfer note it cannot be removed. This is best explained using an example (Figure 2).

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Prerequisites					
Business A and Business B are both registered on edoc.					
Business A produces waste; Business B collects and disposes of the waste.					
Business A takes the responsibility for creating waste transfer notes (WTNs) for the transfers between the businesses.					
Neither business has enabled their reporting whitelists – i.e. both businesses have the default setting.					
	WTN 1	WTN 2	WTN 3	WTN 4	Comment
1. Business A transfers waste to Business B (WTN 1)					
Business A reporting rights	Yes	–	–	–	
Business B reporting rights	Yes	–	–	–	
2. Business A enables their reporting whitelist (which is initially empty)					
Business A reporting rights	Yes	–	–	–	
Business B reporting rights	Yes	–	–	–	Reporting rights cannot be removed from a WTN
3. Business A transfers waste to Business B (WTN 2)					
Business A reporting rights	Yes	Yes	–	–	
Business B reporting rights	Yes	No	–	–	WTN 2 cannot be reported by Business B
4. Business A adds Business B to their reporting whitelist					
Business A reporting rights	Yes	Yes	–	–	
Business B reporting rights	Yes	Yes	–	–	Reporting rights retrospectively added to WTNs
5. Business A removes Business B from their reporting whitelist					
Business A reporting rights	Yes	Yes	–	–	
Business B reporting rights	Yes	Yes	–	–	Reporting rights cannot be removed from a WTN
6. Business A transfers waste to Business B (WTN 3)					
Business A reporting rights	Yes	Yes	Yes	–	
Business B reporting rights	Yes	Yes	No	–	WTN 3 cannot be reported by Business B
7. Business A disables their reporting whitelist					
Business A reporting rights	Yes	Yes	Yes	–	
Business B reporting rights	Yes	Yes	Yes	–	Reporting rights retrospectively added to WTNs
8. Business A transfers waste to Business B (WTN 4)					
Business A reporting rights	Yes	Yes	Yes	Yes	
Business B reporting rights	Yes	Yes	Yes	Yes	

Figure 2: Reporting whitelist example

edoc all waste reporter role

The edoc all waste reporter role can create and export an **anonymised** overview of all waste transfers recorded in edoc.

The information within the report is **restricted** to entries where there is information from a number of businesses. This is so that edoc does not compromise the confidentiality of any one business. For example, if there was only one business producing a particular type of waste in a region, edoc would hide entries in the report as including them might reveal confidential information to other businesses.

To prevent inference, edoc may hide further data in a report. For example if one, and only one, of the contributing figures for a total cannot be reported, to ensure anonymity the other contributing figures for the total also cannot be reported. This is to prevent the hidden figure being backwardly engineered by taking the other contributing figures away from the total. This is best explained using an example (Figure 3).
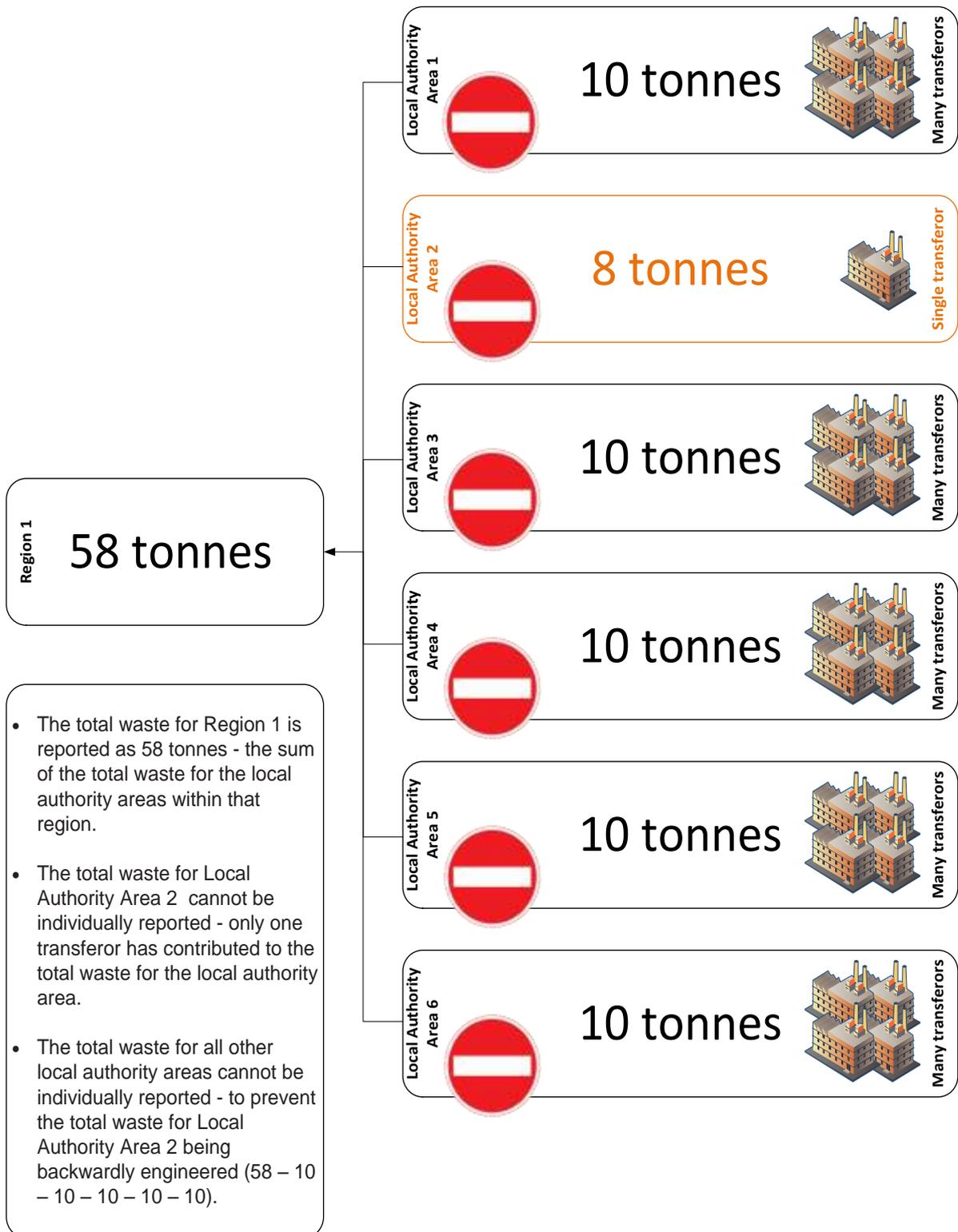
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Local Authority Area 1 — 10 tonnes — Many transferors

Local Authority Area 2 — 8 tonnes — Single transferor

Local Authority Area 3 — 10 tonnes — Many transferors

Local Authority Area 4 — 10 tonnes — Many transferors

Local Authority Area 5 — 10 tonnes — Many transferors

Local Authority Area 6 — 10 tonnes — Many transferors

Region 1 — 58 tonnes

- The total waste for Region 1 is reported as 58 tonnes - the sum of the total waste for the local authority areas within that region.

- The total waste for Local Authority Area 2 cannot be individually reported - only one transferor has contributed to the total waste for the local authority area.

- The total waste for all other local authority areas cannot be individually reported - to prevent the total waste for Local Authority Area 2 being backwardly engineered (58 – 10 – 10 – 10 – 10 – 10).

Figure 3: edoc all waste report reference example

3.1.2 Organisations interested in the transfer of waste

<u>Regulatory officer role</u>

edoc will help support waste regulators but they will not have unrestricted access to it.

Regulatory officers can send a notification to a business to ask to see their waste transfer notes on edoc. When creating a notification, a regulatory officer will receive immediate feedback on whether a business is an active user of edoc but, until a business acknowledges a notification, visibility of their waste transfer notes remains **restricted**.

This mirrors the existing process, and a business has seven full days to respond to a notification from an officer of a relevant waste regulator, for example from the Environment Agency or a waste collection authority (local authority).

Failure to acknowledge a notification is an offence, and may trigger enforcement action, as is the case with the current paper process.

<u>Data quality manager role</u>

The edoc data quality manager tries to help businesses by identifying where simple data entry errors may have been made when describing the quantity of a waste, for example selecting tonnes instead of kilograms. This is to improve the quality of reports and anonymised extracts available to data analysts (see data analyst role).

The queries a data quality manager can run are **limited** to unusual weights; they cannot target an individual business. If a business regularly deals in unusual quantities of waste, for example train or barge movements, the data quality manager can exclude that business from all future queries.

When the data quality manager identifies a waste transfer note with an unusual weight, they can send an email to the creator of the waste transfer note explaining the reason for the email and suggesting they check the details of the waste transfer note. A business can choose to ignore this email.

The data quality manager shall always be independent of any industry regulator that is responsible for the checking of waste transfer notes.

<u>Data analyst role</u>

The data analyst role can query an anonymised and redacted view of the waste transfer notes.

They can also export an anonymous and redacted snapshot of all waste transfer notes held on edoc at that time. This dataset ('the snapshot') will be used by national governments and their environment agencies to meet statutory reporting requirements as well as to inform design, implementation and monitoring of waste policy. The snapshot is different from the edoc all waste report because no aggregation is applied.

Users with the data analyst role will be restricted to named individuals from:

- The Department for Environment, Food and Rural Affairs (Defra)
- The Environment Agency (EA)
- Natural Resources Wales (NRW)
- The Northern Ireland Environment Agency (NIEA)
- The Scottish Environment Protection Agency (SEPA)
- Waste & Resources Action Programme (WRAP)
- Welsh Government
- Zero Waste Scotland (ZWS)

An annual snapshot will be taken by a data analyst from one of the above organisations and shared with the others. This will form the basis of national statistics for that year. Taking one snapshot and sharing it means that the four UK nations will produce data on the same basis. Snapshots may be taken more frequently than annually should the need arise.

Data analysts will cleanse the data in the snapshot, checking for inconsistencies and anomalies. They will then remove problem waste transfer records from the analysis. The records will remain in edoc as the snapshot is a download from edoc.

No contact will be made by data analysts with edoc users; this is assured by the removal of all names and addresses from the snapshot. Equally, data analysts will not be able to ask the edoc data quality manager to make enquiries on their behalf although they will alert them to any commonly occurring issues so they may be tackled in the future.

Data analysts will scale up the snapshot to account for waste produced by companies not using edoc. External data will be combined with the scaled up edoc data so that wastes not covered by Duty of Care requirements are included. This will generate an annual dataset for each of the four UK nations which can be combined to generate data for the UK as a whole (Figure 4).

This data may be incorporated into an on-line interrogator tool which would be available without restriction. Queries that would result in the possibility of an individual site being identified would generate no results.

Some of the data analyst organisations are public bodies and are therefore subject to the requirements under the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR). Ensuring detailed but non-confidential data is available through an interrogator is expected to significantly reduce the number of freedom of information requests that might arise as customers would be able to access some edoc data via such an on-line interrogator.

Any request for information that falls outside of the scope of the data provided by such an interrogator will be considered under the FOIA or EIR and may be subject to disclosure. The relevant public body will have responsibility for determining whether the information is to be disclosed or is exempt from disclosure under the provisions of the FOIA or EIR.

All data and aggregations of data will be stored securely, in compliance with the law and following best practice.
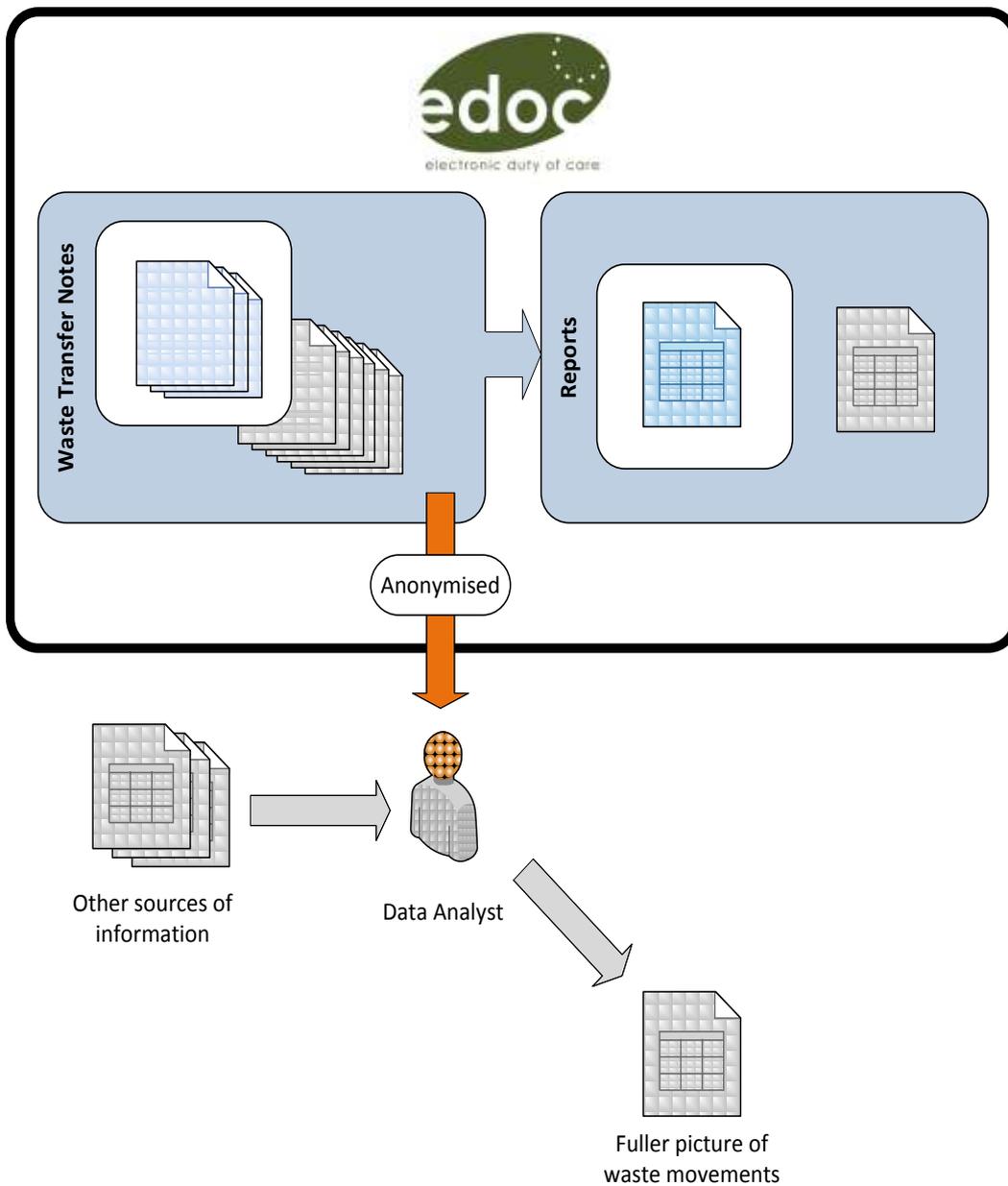
Figure 4: Data analysts use of anonymised data

<u>Freedom of information request</u>

Under freedom of information legislation, public bodies that hold information have a legal obligation to disclose it in response to a request unless there is an applicable exemption in the FOIA or EIR.

Requests for information from edoc will fall for consideration under the EIR. Under the EIR, information that is commercially confidential may be exempt from disclosure if there is an overriding public interest in keeping the information confidential. An assessment of the public interest will be made at the time a request is received.

3.1.3   System custodian role

Information Processing Limited (IPL) host and maintain the edoc system, and they hold edoc's system custodian role.

They have access to edoc to:

- authenticate requests for roles from users within organisations that are interested in the transfer of waste
- resolve technical issues

4. How long is data stored?

4.1 Business information

A business maintains its own details on edoc. The business can delete a user account should the user leave their company. The business can delete a site should they no longer use it.

edoc will store the current business information indefinitely.

4.2 Waste transfer notes

A waste transfer note must be stored for a minimum of two years by law, after which time edoc will automatically archive it. A waste transfer note will be stored for a minimum of six years if the destination site is identified as landfill. This allows the owner of a landfill site to assist in any HM Revenue & Customs (HMRC) queries.

Archived waste transfer notes will still be stored and available in the system, but edoc will remove images associated with them, for example a scanned signature. Archived waste transfer notes will be stored for a minimum of 10 years from the date of the transfer (Figure 5).
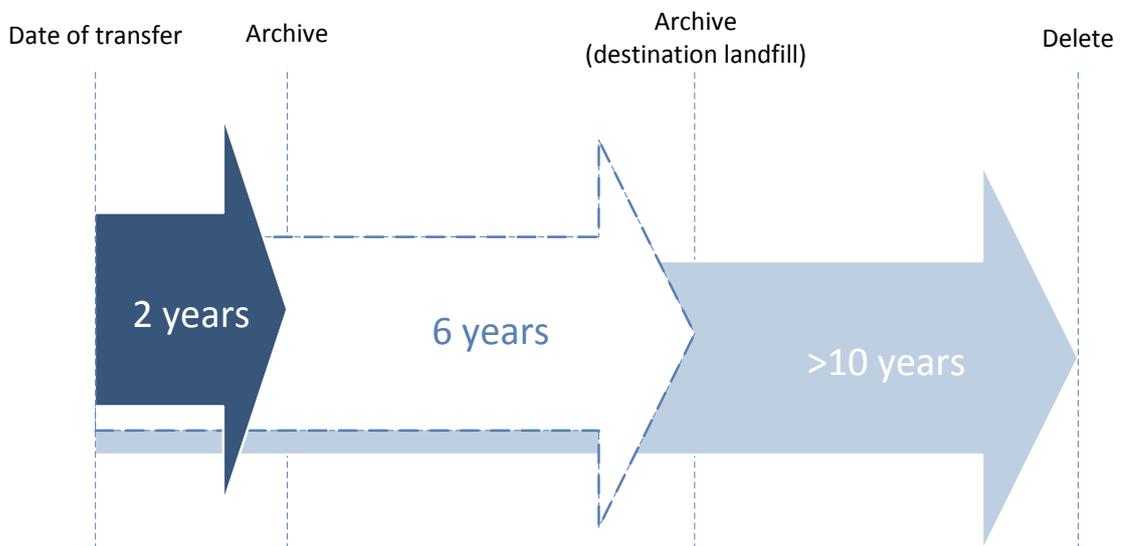
Figure 5: Storage of waste transfer notes in edoc

4.3   Reports

edoc does not store reports. You can create reports upon request from the waste transfer notes currently available on edoc.

Periodically, data analysts (see data analysts role) will perform an extract of **anonymised** waste transfer notes for further analysis (the 'snapshot'). This snapshot may be retained indefinitely to enable data analysts to look at trends over the medium to long term.

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