

Offensive Waste Stream Implementation FAQs

Q: Why is the Offensive Waste stream being implemented?

A: As part of the efficiencies that Anenta has been bringing to waste management in the NHS, we have identified that a large amount of waste is being incorrectly disposed of in Orange Bags. By disposing of waste incorrectly the NHS is spending more than it should. The Offensive Waste stream will ensure that in line with the NHS waste strategy and Net Zero targets, we will see each healthcare waste producing location increase it levels of compliance with the waste hierarchy.

Q: When will this impact me?

A: The Offensive Waste stream will be rolled out during early 2023 – you will receive a communication from your Authority as well as directly from Anenta outlining the exact date of the change.

Q: What do I need to do?

A: The majority of the work required to introduce the Offensive Waste stream will be going on behind the scenes – however, you will need to complete a new Pre-Acceptance Audit as this is a new waste stream – even if your current PAA is in date. You will also receive a communication from Anenta detailing the exact date of the change – your PAA will need to be completed before the implementation date for your location.

Q: Do I still need to use orange bags?

A: A contingency quantity of orange bags should be kept at each location, in the event of a patient presenting with an infection.

Q: What colour are the offensive waste bags?

A: Yellow with a black stripe (known as 'tiger bags')

Q: Does the offensive waste stream get treated differently?

A: Yes, it is considered a different waste stream and is disposed of differently, it depends on the Vendor on how it is treated but many of the Vendors use alternative treatments (rather than incineration), or Energy from Waste to render the waste safe.

Q: What should orange bags be used for?

A: Orange bags should be used for any waste that is deemed infectious. i.e. infectious dressings, swabs

Q: What is the impact of this introduction on sharps waste?

A: There is currently no impact to the management of sharps and the associated containment. Continue to us the UN approved containment as provided by your designated waste disposal contractor.

Q: Do I need new waste bins?

A: No, the existing bins can be used but appropriate signage will need to be provided, to be put on the wall above the bin.

Q: Where do I get new signage to place on the wall above the offensive waste bin?

A: Anenta will provide a template which can be downloaded and printed to use.

Pre-Acceptance Audit (PAA) FAQs

Q: What's the difference between PAAs and Duty of Care (DoC) Waste Management Audits?

A: DoC audits must be completed under Section 34 of the Environmental Protection Act 1990, and applies to the Producer of the waste as well as others in the waste disposal process (e.g. Vendors, waste carriers, waste brokers and waste managers). The PAA is a document that the Vendor requires to enable them to collect your waste and ensures compliance. Whilst the two audits are separate documents, they are both required under the DoC legislation.

Q: Does a Location that is managed by NHS Property Services (NHS PS) do the PAA (or DoC)?

A: No, the managing entity handles that. If NHS PS are managing the waste, they are responsible for the auditing in accordance with the Service Level Agreement with the location

Q: How often does the PAA audit have to be completed?

A: If you produce less than 5 tonnes of clinical waste per year, the audit needs to be carried out every 5 years. If a GP practice produces over 5 tonnes per year the audit needs to be completed on an annual basis.

Q: Can you provide sample audit to better understand what needs to be completed in each section?

A: We do not have a sample audit available. Please follow the information provided in your Vector account with each question to complete the audit

Q: I am unable to go further than the first page.

A: Please select any of the knowledge or training options - the audit needs to be conducted by a qualified person. If you do not meet any of the criteria listed, you need to ask someone at the practice who is qualified to conduct the audit.

Q: What is the SIC Code?

A: The SIC code for GP locations is 86210, and for Pharmacies is 47730

Q: What is an Environmental Management System (EMS)? Where do I get that from?

A: An environmental management system is a system which integrates procedures and processes for training of personnel, monitoring, summarising, and reporting of environmental performance information to internal and external stakeholders of a firm (an example is ISO14001). If an individual location does not have an Environmental Management System, in the first instance, they should check with their ICB if they have a generic one for all locations. If there is not an EMS in place, this question can be answered 'no', and does not have an adverse effect on the audit.

Q: What is the 'Waste Production Area'?

A: When you complete your PAA you will be presented with a number of options to describe the waste production area – for example: "GP Consulting Room A" – these are clinically active areas where waste is produced – not for example: "The Car Park" or "Staines-upon-Thames".

Q: What is 'Waste Producing Process' (in the Waste Production Area section)

A: Please describe the clinical process of the area e.g. "Primary Care Activity", "Pharmacy Activity", "Clinical Treatment", "Minor Surgery" – Do not provide information about the waste type, storage type or waste disposal process in this section

Q: How many rooms have to be included in the audit?

A: This is determined by the person conducting the audit - It depends on the size of the location and there is no set number of rooms that should be included, but a guide of 25% of the rooms could be used.

Q: What type of rooms need to be included?

A: Only clinically active rooms producing clinical waste need to be included. Offices, kitchens, waiting rooms etc.do not need to be included if they are not clinically active.

Q: Do all bins (used and unused) have to be counted for the audit or just the ones in use (full or empty)?

A: Only bins that are in use and in the clinical rooms that are being audited need to be included. If they are empty, there is no need to audit them.

Q: Can I bulk all my locations into a single PAA?

A: No, the audit needs to be completed for each individual site

Q: Do all clinical areas (i.e. rooms) in a location need to be listed? (and then confirm with Yes / No in the 'Included in Audit' section if it is included in the Audit)

A: Yes – they must all be listed but do not all need to be included in the audit – there is a check box to include or exclude a room when you add it to the audit.

Q: The system is still showing unanswered questions or 'Section not completed' is flagged although everything has been completed

A: Please check which section is shown as 'incomplete' and see if there are any fields that have not been completed or buttons not clicked. Alternatively, please click the 'Review Audit' button on the top right and scroll through the audit to see which information is missing. The audit can then be updated from there.

Q: Where can I see the completed PAA?

A: The completed audit can be accessed in Vector in the 'Documents' section under 'General'

Q: I recently completed the PAA, but I keep on receiving reminders?

A: Due to regulatory changes and the introduction of the offensive waste stream the Pre-Acceptance Audit has to be completed again. If this has been completed to include Offensive Waste, please raise a ticket in your Vector account so that this can be looked into.

Q: I have completed my PAA, but it is not shown in Vector

A: Once you completed the audit please click 'Review Audit' on the top right. From there the system leads you to a summary page where you can review your responses before confirming the submission. You need to scroll to the bottom of that page and click the 'Submit Audit' button.

Q: Audit submitted and did not hear back – Is the PAA ok?

A: Once submitted the PAA is sent directly to your waste collection vendor. If they identify any issues, they reject the audit. At that point we re-open the audit and inform you about the areas in question for you to make the relevant adjustments. You will receive an email about this so that the relevant sections can be rectified. Once the PAA is accepted by the Vendor, it will show in your Vector account.