



Department of
the Premier and Cabinet



Sustainable Device Management Guide for the WA Public Sector

Guiding agencies towards responsible device
disposal, re-use, and circular economy practices

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Introduction

It is estimated that over a 5-year period, approximately 10 million desktops, laptops and tablets and a further 6.5 million mobile phones will be refreshed by Australia's corporate and public sector¹. Over this period, those refreshed by the state and federal public sector alone could generate up to 2.6 million devices². This presents an opportunity for businesses and the public sector to redirect their e-waste for social good.

This Guide has been developed to assist the Western Australian public sector to advance the Government's economic, social, and environmental objectives by promoting the sustainable disposal of end-of-life ICT devices through donation, reuse, or responsible recycling.

Device Lifecycle Steps Overview



Plan



Cleanse



Dispose



Report

References on: PG 24 Annex C

Advice provided in this Guide both complements and aligns with the current authorising environment, including the:

- Digital Strategy for the Western Australian Government 2026–2030
- Digital Inclusion in WA Blueprint
- Western Australian Social Procurement Framework
- Western Australian Government Cyber Security Policy
- Western Australian Procurement Rules (WAPR) and Guidelines
 - Rule E4: Disposal of Goods
 - Disposal Guideline
- Western Australian Waste Avoidance and Resource Recovery Strategy 2030
- State Records Office of Western Australia Guideline: Records Retention, Disposal and Destruction
- *Waste Avoidance and Resource Recovery (e-waste) Regulations 2024* — Part 2 Prohibition on disposal of e-waste to landfill.

This Guide is intended to supplement the [Digital Transformation Agency Sustainable Device Management Guide](#) for Commonwealth entities (May 2025). It will be updated regularly to reflect changes in the WA policy landscape, ensuring it remains fit for purpose.





Objective

To encourage more device donations in WA government by integrating sustainable end-of-life practices into procurement planning.

Scope

This Guide provides advice for sustainable life-cycle management of ICT devices (devices), from procurement to decommissioning and disposal. It has a particular focus on disposal by donation and reuse of devices no longer suitable for government use, following the refresh cycle.

The devices in scope include:



Laptops



Tablets



Mobile phones

The Guide is designed for those involved in ICT device purchasing, disposal and sustainability matters within all WA public sector agencies, as defined in the *WA Public Sector Management Act 1994*.

Devices that are sourced via Device as a Service (DaaS) are out of scope.





Alignment with WA Cyber Security Policy

It is a requirement of the WA Government Cyber Security Policy that state agencies:

- Adhere to Cyber Security Policy Clause 1.6 – Maintain oversight of the secure disposal of devices, computers or media that hold digital information.
- Ensure that all government-owned information on the device is sanitised before the device is repurposed, to avoid accidental or unauthorised disclosure of government information.

This Guide ensures that these requirements are considered in developing an ICT Disposal Strategy.





Alignment with WA Procurement Policy

It is a requirement of the WAPR that State agencies:

- Seek value for money outcomes when undertaking procurement which considers Government's social, economic and environmental priorities as well as cost and other relevant non-cost factors. **Value for money must be considered at all stages of the procurement lifecycle.**
- Dispose of goods ethically, equitably efficiently and safely and in a manner that maximises a value outcome for government.
- Undertake appropriate procurement planning – i.e. research, analysis and planning in line with the risk, locality, value and strategic importance of the Procurement.

This guide complements these principles by providing practical steps for sustainable device management, including secure data sanitation, reuse and supplier engagement. Relevant Common Use Arrangements (CUAs) include:

- Recycling and Waste Redirection Services CUARWD2025 – Provides Commercial and Industrial Recycling and Waste Redirection Services to all State agencies and other approved CUA users.
- Computing and Mobile Devices CUACMD2021 – for sourcing computing products including desktops, notebooks, tablets and other computing devices.

Note: the Recycling and Waste Redirection Services CUARWD2025 has superseded the Waste Disposal and Recycling Services CUAWAS2016, making it non-mandatory to use CUA contractors for ICT waste disposal.



Device Disposal Partnership Considerations

A growing number of organisations can assist in the process of recycling, refurbishing and donating ICT devices, where agencies lack capacity. While few WA e-waste providers are formally certified (e.g. AS/NZS 5377 or R2v3), many provide bespoke certificates of data destruction. Some may even be able to provide rebates to agencies stemming from the residual value of the devices.

By partnering with these organisations, agencies can advance their sustainability and circular economy objectives while ensuring secure and efficient disposal of devices. Such partnerships may also help address logistical and data security concerns during decommissioning and create opportunities to refurbish and donate suitable devices to those in need.

There is much to consider when it comes to choosing a sustainable e-waste provider. Agencies should carefully analyse the entity, with a particular focus on their:

- Data security
- Reputation
- Sustainability track record
- For donations, their ability to offer additional support to recipients such as IT support, pre-installed software and virus protection.

By choosing organisations which have a comprehensive and ethical approach to recycling, refurbishment and donations of devices, agencies can ensure their donations make a lasting impact.

Agencies have an obligation to:

- ensure the partner adheres to required security standards if they will be conducting the device cleansing.
- Assess and mitigate any potential risks to the agency regarding liability for the use of donated devices.
- Ensure the partnership is fair and equitable, and in line with the [disposal guideline](#).

Recommendations

- 1) Compare multiple organisations to find the best fit for quality, price, and service.**
 - a) Understand their history in conducting similar services.
 - b) Ensure they have the right infrastructure to handle the proposed scale of donations, including logistics and distribution networks.
 - c) Depending on desired level of involvement in the donations, ensure the impact can be maximised where possible.
- 2) Chose organisations that offer additional resources, such as those that provide:**
 - a) Ongoing technical support and warranty for donated devices.
 - b) Reports on the use and impact of donated devices
 - c) Transfer of title when devices are donated to minimise liability concerns.
 - d) Options for a trial period or an exit strategy, such as a pilot program, to test the partnership and process before making any commitments.
- 3) Ensure roles and responsibilities are clearly defined in contractual agreements.**
 - a) Consider who will be responsible for:
 - 1) Assessing what has the potential for reuse;
 - 2) Storage and transportation of devices;
 - 3) Data cleansing; and
 - 4) Distribution of devices and impact tracking.
- 4) Ensure all actions are ethical and can be adequately justified.**
- 5) Look for partners which can provide a certificate of data destruction to ensure security standards are upheld.**

Relevant Links

- [AS/NZS 5377 E-Waste Standard](#)
- [R2 Certified Facilities](#)
- [Australian Signals Directorate Information Security Manual](#)
- [Microsoft Authorised Refurbisher Program](#)
- [Digital Transformation Agency Sustainable Device Management Guide](#)

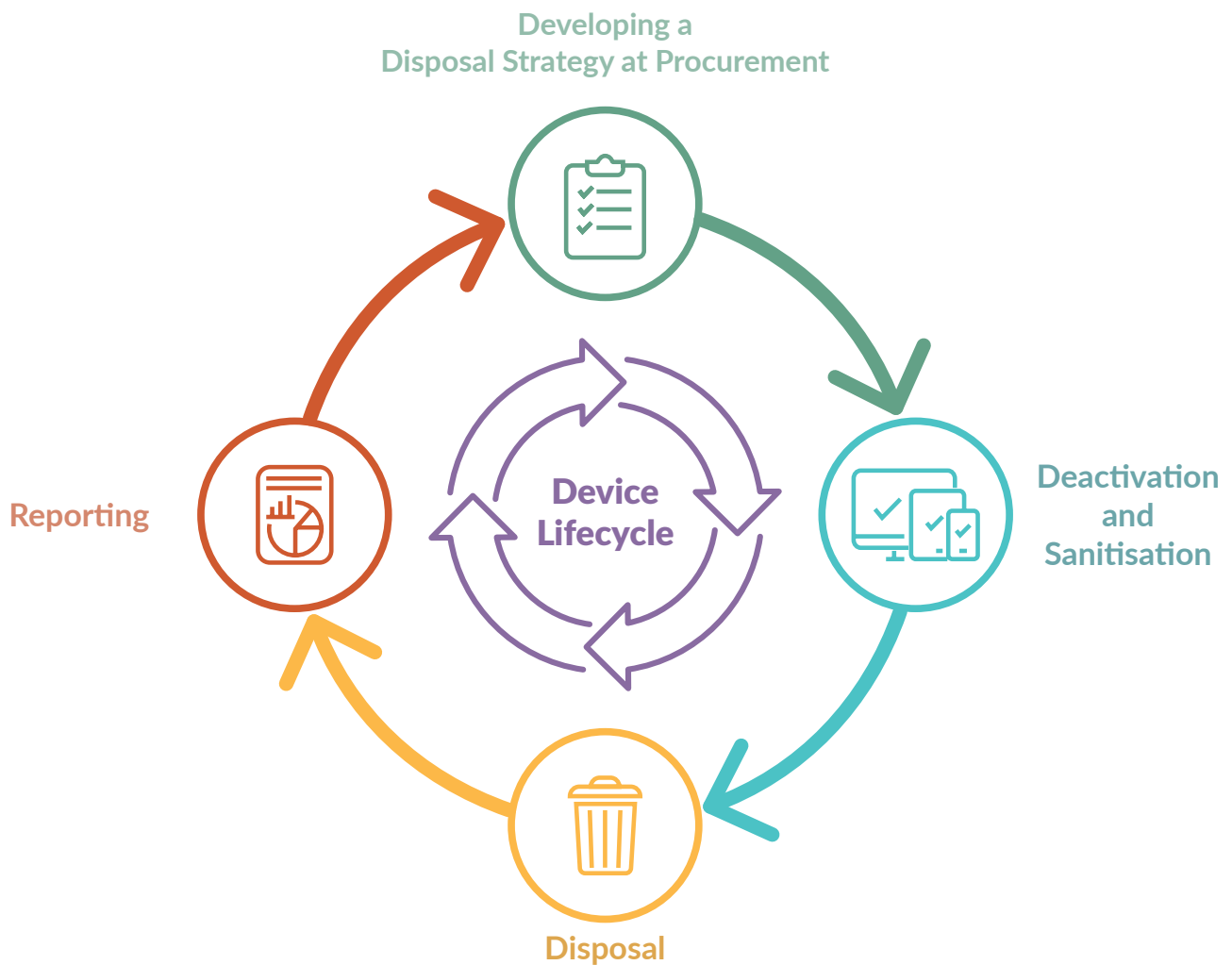


A Sustainable Device Lifecycle Management Approach

The information and recommendations presented in this guide are organised into four sections that reflect best practice sustainable device lifecycle management: Developing a disposal strategy at Procurement, Deactivation and Sanitisation, Disposal, and Reporting.

There are many ways to deliver a sustainable end-to-end process, including:

- In-house data wiping/sanitisation, refurbishment and donation;
- In partnership with a CUA contractor or alternative e-waste provider that wipes the data before passing devices to another partner for refurbishment and/or distribution.





Developing a Disposal Strategy at Procurement

End-of-life management is an important part of the device procurement process. Early consideration of how the disposal process can create additional value for both the agency and society assists agencies in aligning with the WA Environmental Procurement Guide and Social Procurement Framework.

According to the Environmental Procurement Guide, state agencies should make purchasing decisions based on the entire lifecycle of the goods, services and work, considering associated costs, environmental risk and benefits including broader environmental implications. Desirable outcomes and benefits of the procurement process include reduced waste and by-products (e.g. waste avoidance, reuse and recycling).

During this stage, agencies may wish to engage a waste and recycling Common Use Arrangement (CUA) contractor, or an external partner organisation to assist with their chosen disposal option.

Disclaimer

The procurement principles of fairness and equity apply to disposing of goods via donation to charitable organisations. Agencies should consider the flow on effects from these practices and factor this into risk assessments.

Note: The ease with which your agency can donate or reuse end-of-life devices will likely depend on how well-thought-out and comprehensive your disposal strategy is.



Recommendations

1) Identify and specify the end-of-life disposal method at the procurement stage

- a) Evaluate the environmental impact of disposal methods and prioritise options that minimise harm and promote sustainability, such as donation.
- b) Discuss take-back, buy-back options and/or donation options with your supplier, or determine whether any devices could be reused within your agency.
- c) For a full list of disposal options, refer to the Disposal Guideline.

2) Engage with organisations that facilitate sustainable e-waste recycling and device donation and determine how they can assist with your sustainable disposal goals.

- a) Consult a CUA contractor for support in recycling your e-waste and assessing its recyclability (refer to CUARWD2025).
- b) Choose vendors who practice ethical, sustainable device disposal and include these requirements in contracts.

3) Consider the whole-of-life costs in the procurement process, including decommissioning, remediation and disposal costs.

- a) Determine which elements of the device disposal stages you prefer to complete in-house or engage a partner organisation to complete. This will help you determine the costs of your sustainable disposal scheme.

Relevant links

- [CUARWD2025](#)
- [Disposal Guideline](#) – Department of Treasury and Finance
- [WA Environmental Procurement Guide](#) – Department of Water and Environmental Regulation
- [WA Social Procurement Framework](#) – Department of Treasury and Finance

Case Study 1: Agency A explores a % donate % buy-back model with a certified e-waste recycler in WA, to recoup some of the costs associated with the disposal process. They found that this delivered a positive value for money and social impact outcome.



Deactivation and Sanitation

Agencies must follow the data destruction requirements in the Records Retention, Disposal and Destruction Guideline (SRO Guideline) and WA Government Cyber Security Policy Clause 1.6 when disposing of ICT devices, ensuring government information remains secure.

Before donating, repurposing, or returning leased devices, agencies must ensure that all data contained on the device has been wiped to an appropriate level and no longer recoverable. The security controls to consider in this process include:

- The mandatory use of approved sanitisation tools and techniques
- Adherence to structured protocols for data erasure
- Verification of successful data destruction

Agencies may cleanse devices themselves or engage a partner organisation for documented data destruction. This erasure is important in meeting data privacy guidelines and the prevention of data breaches/theft.

The type of data destruction required will depend on the data-sensitivity level. This is outlined in the SRO Guideline.

Disclaimer

- 1) Before passing devices to charities for donation, agencies must ensure that the devices have been cleansed to the appropriate level.

Agencies must:

- 2) Conduct a thorough risk assessment to identify any potential threats associated with the disposal process.
 - a) Maintain a record of the devices being donated, including the classification of information stored on the devices and security measures for transfer/disposal.
- 3) Implement a thorough sanitisation process involving multiple passes of overwriting data and verification
 - a) Use appropriate sanitisation software to remove data from the device. If this cannot be done in house, then a partner organisation should be engaged to complete the data sanitisation.
 - b) Document the sanitisation process, including the methods used and verification results (e.g. certificate of data destruction).

- 4) Adhere to WA Cyber Security Policy clause 1.6 - each entity must maintain oversight of the secure disposal of devices, computers and media that hold digital information.
- 5) Adhere to the data destruction requirements as stated in the Records, Retention, Disposal and Destruction Guideline, and consult the State Records Office if questions remain.

Recommendations

- 1) Maintain a comprehensive inventory system for your ICT equipment, to make it easier to identify which devices are due for disposal.

Relevant links

- [Records Retention, Disposal and Destruction Guideline](#)
- [WA Cyber Security Policy](#)
- [Cyber Security and Record Keeping](#)
- [WA Cyber Security Policy Clauses and SRC Standards Table](#)
- [How to dispose of your device securely | Cyber.gov.au](#)
- [WA Government Information Classification Policy](#)

Contact details

- cyber.policy@dpc.wa.gov.au

Case study 2: Following their regular ICT asset refresh cycle, Agency C partnered with a CUA contractor who is receptive to reuse and donation schemes. The CUA contractor performs the data sanitation with a certificate and facilitates requests from business units within the agency to donate the devices to organisations that support digitally excluded individuals state-wide.



Disposal, refurbishment and donation of goods

The agency's Delegated Authority is required to consider all disposal methods in accordance with the principles and objectives set out in the WA Procurement Rules.

Partner organisations can assist agencies in:

- Determining which devices are most appropriate to donate;
- Refurbishing devices; and/or distributing devices to desired end-recipients.

This stage of the device disposal process presents considerations for public sector bodies regarding the allocation of refurbished devices. Collaborating with a partner organisation that manages donations can help distribute government-owned devices to recipients, minimizing potential public or political concerns.

Note: Many partner organisations offer discounts or other incentives when it comes to recycling e-waste. Taking advantage of these incentives can make this process more convenient and affordable.

Recommendations

- 1) Make sure you know which devices in your kit are reuseable or should be marked for recycling.**
 - a) Consider using a partner organisation if agencies lack the necessary resources to make this determination.
 - b) Maintain an asset register to identify devices that have reached the end of their usable life and may be suitable for decommissioning.
- 2) Make sure that when distributing the refurbished devices, liability/ownership of the device transfers to the partner organisation or the person receiving it.**
 - a) Ensure that this liability transfer is documented.

If there is already an agreement in place for the disposal method of ICT devices, take into consideration the following questions:

- Is it aligned with your agency's circular economy/waste minimisation goals?
- Is there potential to revise the contract conditions to encourage more reuse/donation pathways?
- Is there scope for devices to be returned to the manufacturers for a credit and new devices be donated?

Relevant Links

- [Disposal Guideline](#) – Department of Treasury and Finance
- [CUARWD2025](#)





Reporting

Agencies must adhere to relevant e-waste reporting requirements such as those applicable to local governments under part 3A of the *Waste Avoidance and Resource Recovery Regulations 2008*. If you have questions regarding your e-waste reporting responsibilities, please contact ewaste@dwer.wa.gov.au

Recommendations

- 1) Consider implementing ways to report internally on the outcomes of disposing devices sustainably, including data on the amounts diverted from landfill and number of devices successfully refurbished and donated back into community.
- 2) Build your scheme into annual reporting on sustainability and social impact.
- 3) Share your story!

Success stories should be elevated across WA government and GTEs of ways agencies are being more sustainable with their ICT management. If you believe your agency has achieved success, please contact us via the details below.

Relevant links

- [e-waste ban factsheets](#)
- [E-waste ban – Significant entity overview](#)

Contact Details

- DGovStrategy1@dpc.wa.gov.au
- ewaste@dwer.wa.gov.au





Current Stock Device Donation Flowchart



1. Identify devices for donation

- Use asset registers to find ICT devices end-of-life or no longer needed.



2. Assess suitability for Donation

- Evaluate device condition and potential for reuse, refurbishment, or donation.
- Engage internal stakeholders (e.g., IT, Procurement).



3. Data Security & Sanitation

- Back up any required data.
- Perform data wiping certified tools.
- Obtain and retain a certificate of data destruction.



4. Select Donation Partner

- Research and engage certified e-waste providers or social purpose organizations.
- Assess partner's data security and ability to provide a certificate of data destruction.



5. Prepare Donation Agreement

- Develop and sign donation agreement with the recipient organisation.
- Clearly define roles, responsibilities, and transfer of ownership.



6. Transfer devices

- Arrange logistics for device delivery.
- Ensure all documentation (asset register, certificates, agreements) is complete.



7. Reporting and Continuous Improvements

- Record details of donated devices and outcomes.
- Report internally and externally as required (e.g. annual sustainability reporting).
- Review and update processes for future donations.



Annex A: Definitions

Effective device donation and responsible e-waste management not only advance environmental and social outcomes but also support digital inclusion initiatives across Western Australia. The following definitions clarify the key terms used in this guide.

Agency

A department, SES Organisation or non-SES organisation as defined in the *Public Sector Management Act 1994*.

Partner Organisation

For the purposes of this guide, a partner organisation refers to an entity which can assist agencies with their sustainable e-waste goals, such as conducting data cleansing, refurbishment, and organising donations. This entity has been chosen via a fair and transparent selection process aligned with WA Procurement Rules.

Sanitisation

Also known as data cleansing, sanitisation is the process of destroying data on a memory device by digital means, such as erasing or overwriting, or by physical destruction, to make it permanently unrecoverable.

Donation

Donation refers to giving something voluntarily – such as money, goods or time – to help a person, organisation or cause. For the purposes of this document, donation refers to the gifting of devices suitable for reuse, to social purpose causes to reduce digital exclusion.

Device

ICT devices in scope of this guide include:

- Computers/laptops
- Tablets
- Mobile phones

Accountable Authority

Under the *Procurement Act 2020 (WA)* the Accountable Authority is responsible for ensuring the agency complies with procurement rules and directions. This is usually the Director General.

Delegated Authority

The Accountable Authority may delegate procurement responsibilities to other officers within the agency.

End-of-life

'End-of-life' in this guide refers to the stage in the device lifecycle when it is no longer needed or suitable for government use. A decision must then be made as to its disposal method.

Manufacturers end-of-life refers to the point at which a manufacturer stops producing, selling or supporting a hardware product. This guide does not support the donation of devices at the end of its manufacturer's life.

Gift

Something that is given to someone without payment, usually to express appreciation, celebrate an occasion or express good will.

Procurement Rule E4: Disposal of Goods

State agencies must dispose of goods in a manner that is ethical, equitable, efficient, and, where practical, maximises a value for money outcome for government.

Disposal

The word disposal generally means the act of retiring something that is no longer wanted, needed or useable.

For the purposes of this guide, disposal refers to the process of safely and responsibly getting rid of devices that are no longer needed, including the records which were once contained within them.

Re-use

"Re-use" refers to devices that are refurbished to either be donated or sold. If devices are unsuitable for re-use, they can still be recycled for parts.

Circular economy

A system which promotes the continual use, recycling and repurposing of unwanted materials and products to support sustainable practices.

In the context of this guide, a circular economy approach underpins strategies for sustainable e-waste management by prioritising re-use, recycling, and responsible disposal.

Significant Entity

Means a business entity or public entity, that in relation to any financial year –

- a) Has 200 or more full-time-equivalent employees at the beginning of the financial year; or
- b) Created, during the immediately preceding financial year, five or more tonnes of regulated e-waste





Annex C: References

- 1.1 Aggregated from Industry data in a market summary paper prepared for Good Things Foundation and WorkVentures (with reference to: IBISWorld F3492; IBISWorld OD5470; SpiceWorks; Euromonitor; BusinessWire; Islam et al 2021; Islam et al 2020). As cited in A-Digital-Inclusion-Approach-to-Device-Donation-and-Reuse.pdf, Australian Digital Inclusion Alliance March 2024

- 1.2 Based upon 3.8m devices being refreshed by the public sector every 5 years and 50-70% of donated devices generally being suitable for refurbishment for digital inclusion programs (per experience from WorkVentures). As cited in A-Digital-Inclusion-Approach-to-Device-Donation-and-Reuse.pdf



