

5 March 2026

Dear

ATISN 26706

Thank you for your request which I received on 12 February. You asked for information as provided at Annex 1.

If you are dissatisfied with the Welsh Government's handling of your request, you can ask for an internal review within 40 working days of the date of this response.

Requests for an internal review should be addressed to the Welsh Government's Freedom of Information Officer at:

Information Rights Unit
Welsh Government
Cathays Park
Cardiff
CF10 3NQ

or e-mail: Freedom.of.information@gov.wales

Please remember to quote the ATISN reference number above.

You also have the right to complain to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Website: www.ico.org.uk

However, please note that the Commissioner will not normally investigate a complaint until it has been through our own internal review process.

Yours sincerely

Annex 1

The following recorded information held by your department regarding assurance processes for software based data erasure of end of life IT equipment.

For clarity, this request relates solely to software based data destruction. Please exclude physical destruction methods such as shredding, crushing, degaussing or disintegration.

1. Please confirm whether departmental policy, contractual terms or internal procedures require an explicit outcome based warranty or guarantee confirming that personal data has been rendered irretrievable through software based erasure, whether carried out internally or by an external provider.

Welsh Government relies on certified erasure software, audited processes, erasure reports, destruction certificates and audit rights to evidence that personal data has been rendered irretrievable, rather than relying on a single explicit warranty statement.

The IT Disposals Contract with E-Cycle Ltd defines clear governance and security requirements, including compliance with the Welsh Government's security standards and the use of ADISA-certified Blancco software for data erasure, providing independently validated assurance that software-based erasure is effective. E-Cycle Ltd is also required to maintain ISO 27001 certification.

Assurance is further strengthened through contractual audit rights, enabling disposal and erasure processes to be independently reviewed and verified, and through the recording of all third-party asset disposals in the asset management system, maintaining traceability and auditability of erasure activities. Risk assessments are employed for specialised cases. For example, a separate arrangement for mobile phone disposal via O2 Recycle was approved only after completion of a formal risk assessment, reviewed by the CTO as Information Asset Owner, and the introduction of various operational controls, such as return of devices to Welsh Government offices prior to shipping to O2 Recycle.

2. Where software based data destruction is performed internally, what recorded evidential assurance does the department rely upon to conclude that the final data state is irretrievable?

All software-based data destruction is performed by external providers.

3. Where software based data destruction is performed by a third party provider, does the department hold recorded information demonstrating that any warranty or assurance provided explicitly extends to the software erasure method used and its claimed effectiveness? If so, please confirm the recorded nature of that verification.

Yes, Welsh Government stores copies of Data Destruction Certificates that are provided by E-Cycle. These provide assurance that data has been cleansed in accordance with the Blancco certified software or agreed certified physical destruction processes to IL5. The assurance states that 'The Blancco product exceeds the highest security specifications detailed in the HMG Infosec Standard No: 5 and is certified to the newly launched IEEE 2883 Compliance'.

4. Where no explicit outcome based warranty is required or provided, what recorded form of evidential assurance does the department rely upon to conclude that software based erasure has rendered personal data irretrievable?

Please see response to question 1.

Sanitisation activities carried out by E-Cycle follow audited, certifiable processes, including reports of sanitisation activities, data destructions certificates and regular spot checks (conducted by E-Cycle).