

**NHS Information Governance:
Information Risk Management**

Guidance: Fax Printer Ribbon and Film

Department of Health Informatics Directorate

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Amendment History

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Introduction

This Information Governance (IG) guidance provides NHS organisations with a general awareness of the associated risks for maintenance and disposal of fax printers and other devices that use consumable ribbon or film. It should be read in conjunction with the NHS IG Risk Management Guidance for Maintenance and Secure Disposal of Digital Printers, Copiers and Multi Function Devices.

Terms used:

Fax Printer machines have existed for many years and enable the digital sending of documents over telephone lines. In many corporate environments, standalone fax machines have been replaced by other systems capable of receiving and storing documentation electronically, and then routing them to paper or email (which may be secured).

Fax Printer Ribbon or Film is the device consumable normally provided in 'refill roll' or 'refill cartridge' form designed to work with the relevant fax printer device. These function by the device 'thermal print head' melting a coating of ribbon or film onto the material that the print is applied. As a consequence of thermal printing a readable negative copy image of the printed document may be retained on the used portion of the ribbon or film.

Why are Fax Printer Ribbons or Film an Information Governance issue?

Whilst fax printer devices share much of their technology with other multi-functional print and scanner devices there are additional IG risks where patient or other sensitive information may be copied to and easily read from used or partly used ribbon or film.

This IG risk may be readily apparent where a used ribbon or film roll is unwound and viewed by eye, however, the now common manufacturing practice of sealed and recyclable consumable cartridges may obscure or confuse this risk. In many cases, it is possible that NHS staff who look after such devices may not appreciate the potential risks of unintended information disclosure, or who mistakenly believe the fax printer cartridge technology the same as that used for printer toner.

In addition, it is common practice for manufacturers, their agents and charities etc to encourage the return and recycling of used sealed cartridge units to save on waste, reduce replacement costs or for cash refunds.

What can be done to minimise the IG risks?

It is recommended that NHS organisations should always undertake and document an IG information risk assessment whenever fax printer devices are to be deployed. This is particularly important in those scenarios where patient or other sensitive or confidential information is likely to be involved. An IG Risk Assessment will help the local responsible Information Asset Owner (IAO) to identify likely threats and the potential controls necessary to prevent unintended disclosures. The IG risk assessment should include organisational security, technical and support issues. In addition, consideration will be necessary of the equipment provider's guidance and device instructions for security issues including potential recycling or secure disposal of ribbon or film consumables.

Avoiding IG problems through guidance and countermeasures

Operational and security controls are necessary to minimise the risk of unauthorised disclosures of both NHS patient information and other sensitive or confidential NHS data. These controls should significantly reduce the possibility of any accidental or unauthorised disclosure or confidentiality breach, be that of protectively marked information or otherwise sensitive data copied to the used fax printer ribbon or film.

Please note that the NHS IG helpdesk is unable to provide guidance for the risk identification or treatment of individual fax printer devices or for the disposal of their ribbon or film consumables. Local staff should consider guidance within their device instruction manual as necessary or in any doubt to seek the latest advice of the supplier or manufacturer concerned.

Possible controls that may apply include:

- Liaison with the equipment providers to:
 - Identify the most up to date and reliable sources of guidance for use and maintenance of their fax printer devices and its consumables;
 - Determine appropriate fault reporting processes and procedures;
 - Agree appropriate on-site authorisation and oversight procedures before service/maintenance staff may access premises where the device is located
- Service/maintenance staff may be required to enter NHS premises in order to service or repair the device. Therefore, it is important that the organisation's IG policy and procedures cover this type of on-site support arrangement. These should include procedures to control the introduction or removal of test, used, or partly used ribbon or film, or other components by visiting service/maintenance staff. Equally should the device or its parts need to be removed for offsite repair or replacement there is an IG risk that any information copied to used ribbon or film could still be accessed
- The responsible IAO should ensure there is IG policy and security processes for the approved use, disposal and/or reuse of fax printer devices and their consumables.
- Fax printers should be sited in supervised environments or in separate rooms where access may be controlled.
- Where a commercial service provider is used for confidential waste disposal or destruction of fax printer consumables, it is essential to have a written contract covering the technical and organisational methods and standards to be used, the locations involved, the contractual guarantees and assurances provided. Wherever possible confidential waste disposal activities should be achieved on-site to allow appropriate local oversight.
- Potential recycling of fax printer ribbon or film consumables should be considered within the IAO's IG risk assessment. This will help identify acceptable disposal options available and thus reduce the opportunity of an IG security or patient confidentiality breach arising. The disposal of used fax printer ribbon or film for recycling purposes should only be undertaken where it is sensible and there is good confidence that no security or confidentiality consequences are likely.