

Date: 20th April 2026
Ref: CORP 25/26 - 289

Dear xxx

Freedom of Information request: Recorded Assurance for Software Based Data Erasure of End of Life IT Equipment (CORP 25/26 – 289)

Thank you for your request for information which the Trust received on 4th March 2026. We apologise for the delay in response.

Your Request:

- 1) *Whether your organisation's policies, contractual terms, or internal procedures require an explicit outcome based warranty or guarantee that personal data on a specific storage device has been rendered irrecoverable as a final data state following software based erasure.*
- 2) *Where software based erasure of storage media is undertaken internally, what recorded evidential assurance is relied upon to conclude that the final data state of the specific storage device is irrecoverable, as distinct from confirmation that an erasure process was executed.*
- 3) *Where software based erasure is undertaken by a third party provider:*
 - a. *Do the certificates or contractual documents held constitute an explicit outcome based warranty or guarantee of irrecoverability for each specific storage device processed?*
 - b. *Beyond reliance on supplier accreditation or recognised standards including but not limited to ADISA certification, ISO accreditation, NIST alignment, HMG IA standards, NHS Digital guidance, or Data Security and Protection Toolkit assertions, and beyond confirmation that a wiping process was completed, does the organisation hold any recorded, device specific documentation evidencing independent verification, testing, or validation that the data on the storage media has been rendered irrecoverable in practice?*
- 4) *If no explicit outcome based warranty or device specific outcome evidence is held beyond certification, accreditation, or confirmation of process completion, please confirm what recorded form of evidential assurance is relied upon when concluding that personal data has been rendered irrecoverable.*

Please find the Trust's response below:

- 1) Whether your organisation's policies, contractual terms, or internal procedures require an explicit outcome based warranty or guarantee that personal data on a specific storage device has been rendered irrecoverable as a final data state following software based erasure.**

The Trust's assurance model is based on process compliance and recognised standards. The Trust's policies, contractual terms, and internal procedures do not require an explicit outcome-based warranty or guarantee stating that personal data on an individual storage device has been rendered irrecoverable as a final data state following software-based erasure.

Mae Ymddiriedolaeth GIG Prifysgol Felindre yn hapus i dderbyn gohebiaeth yn y Gymraeg neu'r Saesneg.
Velindre University NHS Trust is happy to receive communication in Welsh or English.



2) Where software based erasure of storage media is undertaken internally, what recorded evidential assurance is relied upon to conclude that the final data state of the specific storage device is irrecoverable, as distinct from confirmation that an erasure process was executed.

Where software-based erasure is undertaken internally, the Trust relies on the following recorded evidential assurance:

- Confirmation that an approved data-erasure process has been executed using Trust-approved tools and methods.
- Asset management records indicating the device has been sanitised prior to disposal.
- Compliance with organisational policies governing secure disposal of IT assets.

The Trust does not hold recorded, device-specific evidence demonstrating independent verification or testing that the final data state of an individual storage device is irrecoverable in practice, beyond confirmation that the erasure process was completed in accordance with policy.

3) Where software based erasure is undertaken by a third party provider:
a. Do the certificates or contractual documents held constitute an explicit outcome based warranty or guarantee of irrecoverability for each specific storage device processed?

Where software-based erasure is undertaken by a third-party provider, the certificates and contractual documentation held by the Trust do not constitute an explicit outcome-based warranty or guarantee of irrecoverability for each individual storage device processed.

Certificates typically confirm that a wiping process was performed in line with recognised standards or supplier methodologies.

b. Beyond reliance on supplier accreditation or recognised standards including but not limited to ADISA certification, ISO accreditation, NIST alignment, HMG IA standards, NHS Digital guidance, or Data Security and Protection Toolkit assertions, and beyond confirmation that a wiping process was completed, does the organisation hold any recorded, device specific documentation evidencing independent verification, testing, or validation that the data on the storage media has been rendered irrecoverable in practice?

Beyond reliance on supplier accreditation or recognised standards (such as ADISA certification, ISO accreditation, or alignment to relevant guidance), and beyond confirmation that a wiping process was completed, the Trust does not hold device-specific documentation evidencing independent verification, testing, or validation that data has been rendered irrecoverable in practice.

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4) If no explicit outcome based warranty or device specific outcome evidence is held beyond certification, accreditation, or confirmation of process completion, please confirm what recorded form of evidential assurance is relied upon when concluding that personal data has been rendered irrecoverable.

Where no explicit outcome-based warranty or device-specific outcome evidence is held, the Trust relies on the following recorded forms of evidential assurance when concluding that personal data has been rendered irrecoverable:

- Use of approved software-based erasure tools and methods.
- Supplier certification and accreditation confirming alignment with recognised data-sanitisation standards.
- Confirmation that the erasure process has completed successfully.
- Asset disposal records maintained in accordance with Trust policy.

I trust this answers your request for information, however, should you not be satisfied with the information supplied or the process of supplying it, you have a right to complain and request a review. Please note that you must submit a request for a review within 40 days of the date of this letter.

You should forward your complaint to:

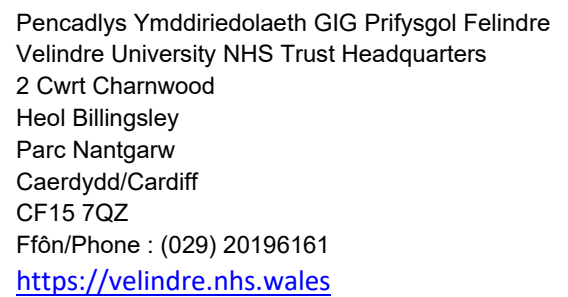
Mr Ian Bevan via FOI.VUNHST@wales.nhs.uk
Head of Information Governance
Velindre University NHS Trust
2, Charnwood Court
Heol Billingsley
Parc Nantgarw
Cardiff
CF15 7QZ

Should you wish to take your complaint further, if you are still unhappy with the decision after review, you can contact the:

Information Commissioner's Office - Wales
2nd Floor,
Churchill House,
Churchill Way,
Cardiff,
CF10 2HH
Telephone: 0330 414 6421
email: wales@ico.org.uk

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