

Personal Data Retention Policy

This Policy applies to personal data within documents and not to the documents themselves. If you still need to retain documents beyond the retention period stated below, consider deleting or destroying the personal data.

The retention periods outlined below apply to personal data in both electronic and hard-copy documents in the control or possession of the NLWA. This document should be read in conjunction with the NLWA Privacy Policy and the NLWA Data Protection Process Note.

Hard-copy documents should be kept secure and locked away overnight. You should consider confidential shredding of hard-copies of documents which have been saved electronically.

Personal Data	Description/Comments	Retention Policy
FOI, EIR and Data Subject Access Requests and correspondence	Contact details of requesters Any personal data released or redacted in responses	To be reviewed quarterly and no information is to be held for longer than three years.
Website “contact us” forms		To be reviewed monthly and deleted after the enquiry is closed or at once if details logged in a central register
Newsletter subscription or request forms		To be deleted if the individual no longer subscribes or wishes to no longer be subscribed or if details logged in a central register
Photos and Photo Permissions	Photos that particularly (and not incidentally) depict the racial or ethnic origin of the data subject, religious beliefs or other beliefs or physical or mental health or condition should be	To be reviewed quarterly and no information is to be held for longer than as stated in the photo permission.

	treated as sensitive personal data.	
Personal data collection forms, pledge forms, competition entries, prize winners and attendance records, feedback forms	This category relates to documents used to collect personal data from members of the public at events or in relation to specific projects or campaigns.	To be reviewed at the end of each campaign or project and not held for longer than three years unless there is a reasonable external requirement for a longer retention period.
Complaints and Petitions – correspondence and registers	This retention period is to safeguard documents that could become evidence in proceedings if a particular matter was escalated.	To be reviewed annually and destroyed after seven years unless a legal claim has arisen – check with the legal team.
Meeting minutes	This will include attendees’ lists, task list and other personal information within the document.	Minutes are to be filed and kept according to the nature or subject matter of the meeting. Authority meetings – indefinitely as these are public documents Litigation correspondence – six years or 12 years in relation to deeds Specific project minutes – see the general document retention policy Regular internal meetings – review annually
General correspondence		To be reviewed annually and destroyed after six years unless

		there is a reasonable requirement for a longer retention period.
Employee/staff information	This includes volunteers and documents generated in relation to successful job applicants.	To be retained for the length of the employment plus six years.
	Unsuccessful job applicants and interviewees	To be reviewed after six months and destroyed unless a claim has been made.
Contactors' and consultants' details		To be reviewed annually and destroyed 7 years after the contract has ended or 13 years for contracts that are signed as deeds.
Contact address books	This includes any details stored in a personal area or files designated as "private" or "personal". This only applies to contacts kept outside of LB Haringey or LB Camden' Global Outlook Address Book.	To be reviewed annually and destroyed when there is no longer an actual or potential professional contact.
Service users details credit schemes and grants	E.g. data room users, compost delivery requests, recycling third party credit registration and the real nappy subsidy.	To be reviewed at the end of the relevant service or expiry of use/qualification. Where information is required for statistical reasons, the personal information can be made anonymous

		and retained.
General registers and logs		To be reviewed annually and at the end of the relevant scheme.
Information from third parties	Information that does not belong or originate from NLWA and has been shared with NLWA for a specific purpose e.g. TUPE employee transfer information obtained from boroughs and LondonWaste Ltd regarding the HWRC transfer project.	To be reviewed annually and at the end of the relevant scheme/project. This information should be returned or securely disposed of at the option of the owner.
Procurement documents – tender documents and correspondence with bidders	Personal data could be in the form of CVs for project staff as well as individual contact details.	To be reviewed at the end of the relevant limitations period for procurement claims (not contract claims).
Consultation documents and consultees details	E.g. responses from residents consulted on planning applications.	To be reviewed at the end of the consultations period and retained until after any relevant limitations period for legal challenges.
Invoices & Financial Records		To be reviewed annually and retained in accordance with financial legislation, financial standing orders and regulations.
Other		Seek advice from the legal team.