

Personal Data Retention Policy

This Policy applies to personal data within documents and not to the documents themselves. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

If you still need to retain documents beyond the retention period stated below, consider changing the personal data so that it can no longer be attributed to a specific individual without the use of a reference number, which must be kept separately - in other words anonymising the data or pseudomising it. The other options are deleting or destroying the personal data. NLWA's Data Protection Officer can advise which of these options is most appropriate.

Where the lawful basis for processing is identified as consent in the NLWA Data Register, the personal data must be deleted immediately we receive a request from the individual to delete the personal data. The NLWA Data Protection Officer (DPO) is available to provide advice if required.

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

Hardcopy documents should be kept secure and locked away overnight. Consider confidential shredding of hardcopies of documents saved electronically.

Personal Data	Description/Comments	Retention Policy
FOI, EIR & 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 3 years.

Personal Data	Description/Comments	Retention Policy
Website “contact us” forms		To be deleted once the enquiry is closed or if details logged in a central register
Newsletter subscription or request forms		To be deleted after 3 years or immediately if the individual wishes to no longer be subscribed to the newsletter. The personal data must also be deleted from the Customer Relationship Management System.
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 treated as sensitive personal data.	To be reviewed quarterly and no information is to be held for longer than as stated in the photo permission.
Personal data collection forms*, competition entries, prize winners, pledge forms, and attendance records and 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 or for the person to enter an NLWA competition.	To be reviewed at the end of each campaign or project and not held for longer than 3 years unless there is a reasonable external requirement for a longer retention period.
NLWA Cookbook	Contact details for individuals who supplied recipes for the North London Food Lovers cookbook	Existing recipes to be retained until the next edition is published at which point consent should be refreshed and if not obtained, the personal data should be destroyed.
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 7 years unless a legal claim has arisen – check with the legal team.

Personal Data	Description/Comments	Retention Policy
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 – 6 years or 12 years in relation to deeds Specific Project minutes – see the general document retention policy Regular Internal Meetings – review annually
Emails		Deleted automatically after seven years in accordance with London Borough of Haringey's retention policy. (London Borough of Haringey is NLWA's IT services provider)
General correspondence		To be reviewed annually and destroyed after 7 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 6 years.

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	Unsuccessful job applicants and interviewees	To be reviewed after 6 months and destroyed unless a claim has been made.
Contracts (hard and soft copies)		Retained for at least 6 years or 12 years where a document is under seal. This is to take account of the limitation periods for legal action.
Contractors' 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	<p>This includes any details stored in a personal area or files designated as "private" or "personal".</p> <p>This only applies to contacts kept outside of LB Haringey or LB Camden' Global Outlook Address Book.</p>	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, charity shop registration, Community Fund applications and the real nappy subsidy.	<p>To be reviewed at the end of the relevant service or expiry of use/qualification.</p> <p>Where information is required for statistical reasons, the personal information can be made anonymous and retained.</p>

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General Registers & 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.	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.	Six months from the date of contract award and thereafter destroyed
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.
Communications with North London Heat and Power Project (NLHPP) stakeholders, Planning Inspectorate and BEIS (minutes, saved emails)		To be reviewed annually and retained for 7 years unless there is a legal requirement for a different retention period
Contracts and legal agreements e.g. settlement agreements with landowners	Personal data could be in the form of the signatories to the legal agreement or contract	To be retained in line with legal requirements. Consult the Legal Officer for advice on legal requirements.
Operational records	E.g. The online van booking system used in order to pre-book a van into a reuse and recycling centre and waste movements on the Waste Management Data System	To be reviewed every 2 years.

Personal Data	Description/Comments	Retention Policy
Invoices & Financial Records		To be reviewed annually and retained in accordance with financial legislation, financial standing orders and regulations.
Other		Seek advice from the DPO.

*Note that where personal data collection forms are collected by an NLWA contractor, NLWA's contract with the contractor shall specify that at the written direction of NLWA, the contractor shall delete or return Personal Data (and any copies of it) to NLWA on termination of the Contract unless this Contractor is required by Law to retain the Personal Data. It is the responsibility of the Authorised Officer for the relevant Contract to ensure that they request for the deletion or return of the data to NLWA at the end of the contract.