

Privacy Notice for Waste & Recycling Services

We have a statutory duty to [collect household waste \(which includes general waste, recyclables, clinical, garden and bulky wastes\)](#) in the borough of Dartford. The Council is allowed to charge directly for some of these services such as bulky waste and garden waste collections.

We need to collect your personal information to carry out these functions.

Processing activity - most of the personal information we hold about you is provided by you in your application(s) for a waste service, such as a bulky waste collection, or when you complain to us. The information collected and held will vary and depend on the nature of the service. We will process personal information relating to:

- refuse collections
- recycling collections
- food waste collections
- garden waste collections
- bulky household waste collections
- clinical waste collections
- complaints
- routine service requests
- general correspondence between you and us on matters related to the our waste and recycling service

Information requirements - this information may include:

- your address, telephone number, email address;
- record of fee payments (excluding debit/credit card details).

Lawful bases - our lawful bases for processing your personal information are:

- our legal obligation(s) under the Environmental Protection Act 1990
- performance of a contract (e.g. where you have paid for a garden waste collection service)
- necessary for the performance of a task in the public interest or in the exercise of official authority vested in us under the above legislation

Reasons for processing - some of the information we collect is classified as:

- special category personal data (physical or mental health);
- criminal convictions and offences (including alleged offences).

This is processed for reasons of substantial public interest under the laws that apply to us (see above) where this helps to meet our broader social obligations such as where it is necessary for us to fulfil our legal obligations and regulatory requirements. We have a Data Protection Policy that sets out how this information will be handled.

Data sharing – we may share with and receive personal information from:

- Council departments (including the Community Safety team)
- our outsourced waste collection service provider
- the Police (to aid with the detection and prevention of criminal acts)
- the Ombudsman (when you complain about our service)

We may also rely on a number of **exemptions**, which allow us to share information without needing to identify a lawful basis for the sharing and without needing to provide you with information about the sharing. Please refer to the Kent & Medway Information Agreement for further details on our sharing arrangements.

Retention period - we keep your personal information for the minimum period necessary. The information outlined in this Privacy Notice will be kept in accordance with the retention periods referred to in the Waste & Recycling Services Information Asset Register. All information will be held securely and disposed of

confidentially.

Right to object – where processing your personal information is required for the performance of a public interest task (see our lawful bases above), you have the right to object on 'grounds relating to your particular situation'. We will have to demonstrate why it is appropriate for us to continue to use your personal data.

Anonymisation- your personal information may be converted ('anonymised') into statistical or aggregated data in such a way that ensures that you cannot be identified from it. Aggregated data cannot, by definition, be linked back to you as an individual and may be used to conduct research and analysis, including the preparation of statistics for use in our reports such as showing the number of complaints we receive and/or equalities monitoring, but not in a form which identifies anyone.

Changes to this Privacy Notice – we review this Privacy Notice regularly and will place updates on our website

Please refer to our Corporate Privacy Notice at www.dartford.gov.uk for further details of how we process your personal information and your rights.

WASTE & RECYCLING MANAGEMENT - INFORMATION ASSET REGISTER 2018

Strategic Directorate	Information Asset Owner	Record/Information Description	DPIA ¹	Retention Period	Statutory or Common Practice	Action taken at end of retention period – e.g. disposal/archive	Personal Data	Lawful basis for processing personal data	Sensitive data	Lawful basis for processing sensitive data	Held manually and/or on electronic systems (including mobile devices)	Children (under 13) – parental consent normally required
External Services	Waste and Parks Manager	Procedures and guidance -on a range of service matters	N/A	Supersedes preceding version	Common Practice	Superseded	No	N/A	No	N/A	Electronic	N/A
External Services	Waste and Parks Manager	Refuse Collection and Street Cleansing – successful tender - case file material – tender, contracts and ancillary correspondence etc.	N/A	6 year for contracts under hand 12 years for contracts under seal	Common Practice	Secure Disposal	Yes- (identifiable natural persons only) – name , address, contact details, financial data	Public interest task pursuant to Sections 45 and 89 Environmental Protection Act 1990 (as applicable)	No	N/A	Electronic - Idocs	N/A
External Services	Waste and Parks Manager	Refuse Collection and Street Cleansing - contract management – correspondence etc.	N/A	6 year for contracts under hand plus 1 year 12 years for contracts under seal plus 1 year	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details, financial data	Public interest task pursuant to Sections 45 and 89 Environmental Protection Act 1990 (as applicable)	No	N/A	Paper copy &/or electronic - UNIFORM	N/A
External Services	Waste and Parks Manager	Refuse Collection and Street Cleansing transfer notes and related documents	N/A	6 year for contracts under hand plus 1 year 12 years for contracts under seal plus 1 year	Common Practice	Secure Disposal	No	N/A	No	N/A	Paper copy	N/A

¹ When building new IT systems for storing or accessing personal data, developing legislation, policy or strategies that have privacy implications, embarking on a data sharing initiative; or using data for new purposes, evaluation or scoring, including profiling, automated decision-making, systematic monitoring of individuals, processing sensitive data, processing data on a large scale, matching or combining datasets, processing data concerning vulnerable data subjects, innovative use or application of technological or organisational solutions, data transfer across borders outside the EU, when the processing in itself "prevents data subjects from exercising a right or using a service or a contract

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External Services	Waste and Parks Manager	Waste Collection data – domestic, bulky, clinical, controlled, commercial waste	N/A	2 years from date of last action	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task pursuant to Section 45 Environmental Protection Act 1990 or performance of a contract (where applicable)	No	N/A	Paper copy &/or electronic - UNIFORM	N/A
External Services	Waste and Parks Manager	Routine Service Requests – correspondence etc.	N/A	3 years from date of closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task pursuant to Sections 45 and 49 Environmental Protection Act 1990) as applicable)	No	N/A	Electronic - UNIFORM	N/A
External Services	Waste and Parks Manager	Complaints – case file management – correspondence etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task pursuant to Sections 45 and 49 Environmental Protection Act 1990 (as applicable)	No	N/A	Paper copy &/or electronically	N/A
External Services	Waste and Parks Manager	Local Government & Social Care Ombudsman – case file material - complaints received and outcomes	N/A	1 year from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details	Public interest task – Local Government Act 1974	Yes- health data, offences (including alleged offences) etc.	Substantial public interest task – Section 26(5) Local Government Act 1974	Paper copy &/or electronic - Idocs	N/A
External Services	Waste and Parks Manager	Abandoned Vehicles – case file material, notices etc.	N/A	2 years from date of case closure unless exceptional circumstances require longer retention e.g. pending court case	Common Practice	Secure Disposal	Yes - (identifiable natural persons only) - name , address, contact details, car registration data etc.	Public interest task pursuant to Sections 4 and 4A of the Refuse Disposal (Amenity) Act 1978	No	N/A	Paper copy &/or electronically	N/A

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External Services	Waste and Parks Manager	Performance Indicators - statistical information (anonymised)	N/A	If a performance indicator is no longer required, deactivate and archive the indicator and delete from Pentana after 1 year	Common Practice	Disposal	No	N/A	No	N/A	Electronic - Pentana	N/A
External Services	Waste and Parks Manager	Correspondence (general) – emails, letters, memos etc.	N/A	1 year unless considered important for future reference	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task – pursuant to legislation referred to in this IAR	No	N/A	Paper copy &/or electronically	N/A

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External Services	Waste and Parks Manager	Safeguarding Referrals (children & adults at risk)	Yes	Delete immediately following receipt by KCC	Common Practice	Secure Disposal	Yes – (identifiable natural persons only) - name , address, contact details	Public interest task/legal obligation – Children Act 2004/Care Act 2014 Statutory Guidance - Working Together to Safeguard Children Children Care & Support Statutory Guidance	Yes – health data, offences (including alleged offences)	Substantial public interest task/legal obligation – Children Act 2004/Care Act 2014 - Working Together to Safeguard Children Care & Support Statutory Guidance	Paper copy &/or electronic	Yes

WASTE & RECYCLING MANAGEMENT - INFORMATION ASSET REGISTER 2018

TECHNICAL & ORGANISATIONAL SECURITY MEASURES

Strategic Directorate	Information Asset Owner	IT Systems	Security Measures
Internal Services	I.C.T. Manager	Idocs/UNIFORM/ Academy and department computers and laptops/Internet/ Intranet – maintenance and administration	Password administration, data encryption, implementation of PSN based email services, IT services contingency planning, firewall barriers to hackers, virus protection software, full back-up, rescue disks, security audits, regular testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing, corporate guidance on organisational/security measure, DPIAs
Internal Services	Policy & Corporate Support Manager	Pentana – maintenance & administration	BS ISO/IEC 27001:2013 compliant
Internal Services	Customer Services Manager	On-line payments (hosted by Capita)	PCIDSS compliant
External Services	Waste and Parks Manager	Disaster recovery	See Business Continuity Plan
External Services	Waste and Parks Manager	Idocs/UNIFORM /Pentana and computers and laptops/Internet/ Intranet - input of waste management data	Use of passwords
External Services	Enforcement & Regulatory Services Manager	CCTV -administration and maintenance	A key part of the Council's security set up

WASTE & RECYCLING MANAGEMENT - INFORMATION ASSET REGISTER 2018

CONSENT, OUTSIDE EEA TRANSFERS, DATA PROCESSOR, MARKETING AND RISKS

Categories of data subject	Recipients of personal data	If lawful basis for processing is CONSENT -is procedure in place for explicit consent and withdrawal of consent	Outside EEA Transfers –if yes – have you checked contractual requirements?	Data Processor (i.e. processing undertaken by a third party under contract) & ISAs	Data Processor Contract Checked - to be varied to incorporate 2018 DPA requirements?	Marketing	Portability	Risk category (to be mapped in accordance with the Council's corporate/strategic risk impact table) Operational Risk Register updated YES/NO
Identifiable natural persons such as leaseholders, tenants, complainants, applicants, service users etc.	1.Council department(s) 2.Ombudsman 3.Contractors 4.MP 5.Councillors 6.KCC 7.Utilities (information to and received from) (Digital Economy Act 2017 – fuel poverty provisions)	N/A	N/A	Pentana – Cloud based – retention only Secure Office Waste Disposal - no processing Amey LG Ltd – secure waste disposal	Pentana - BS ISO/IEC 27001:2013 compliant Secure Office Waste Disposal – confidentiality clause in contract Secure waste disposal contract-compliant	N/A	N/A	YES – LOW- risk score 2