



LIFE Education Trust

## GENERAL DATA PROTECTION REGULATIONS [GDPR] 2018

### PROCESSING DATA AND RETENTION SCHEDULE

LIFE Education Trust receives information from schools, parents and staff containing Personal and Special Category Personal Information about students and staff who work or are educated within the Trust. Such information is held and processed in accordance with the General Data Protection Regulations as set out in the Trust's Data Protection Policy.

The DPO for the Trust is: SPS DPO Services contact details: email: [sps-dpo-services@isystemsintegration.com](mailto:sps-dpo-services@isystemsintegration.com) address: SPS DPO Services iSystems Integration, Devonshire House, 29-31 Elmfield Road, Bromley, Kent BR1 1LT and there is a Data Controller at each School within the Trust who determines the purpose and the manner in which data is processed. Each Data Controller is obliged to ensure that:

- the information provided to approved external stakeholders is accurate, up to date and limited to the information required to obtain advice or guidance;
- that the information is transmitted securely using password protection / encryption;
- that appropriate privacy notices have been issued to its staff and students and in certain cases, explicit written consent obtained; and
- a personal file is maintained for each member of staff or student and that these records are retained in accordance with the Trust's retention schedule.

Data is processed by The Trust for the following purposes:

- to comply with our legal obligations in law
- to enable the Trust to process data necessary for reasons of substantial public interests
- to enable the Trust to process contracts in relation to staff employed by the Trust
- to comply with our statutory duty to safeguard children or other obligations in law.

Data may be shared by the Trust as follows:



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- with the DfE in connection with their statutory responsibilities;
- future schools of pupils within the Trust
- the Local Authority Designated officer for the safeguarding of children including CAMHS or other approved agencies who are engaged to work with pupils;
- Payroll and other External Providers (i.e. HR)
- In response to Subject Access Requests;
- other circumstances as maybe required by law including the Police and the Disclosure and Barring Service, NCTL (or successor).

In accordance with the Data Protection Policy and ICT Policy, the Trust employs the following security measures in respect of data:

- All electronic records are held on the secure LGfL network and within secure databases with access via passwords and encryption
- All paper records are held in locked filing cabinets and access restricted to relevant staff.
- Sensitive information is transmitted to and received from schools using appropriate password protection / encryption and via secure networks.

LIFE Education Trust used the IRMS Information Management Toolkit for Schools (Tribal) template and the Essex HR Retention Schedule template in producing this Retention Schedule.

### Data retention

LIFE Education Trust will maintain records only for as long as is necessary and/or as is necessary in law. Paper and electronic records will be securely disposed of in accordance with the schedule.

Data Description	Retention Period	Legal or other basis	Action at the end of the Administrative life of the data
<b>TEACHING AND SUPPORT STAFF</b>			
Personnel files (safeguarding)	Employee's normal retirement age or end of employment +10 years, whichever is longer	Statutory Guidance: Keeping Children Safe in Education, Working together to Safeguard Children. Limitation Act 1980 (Section 2)	Secure Disposal
Personnel files (other – dismissal or other termination or where there is an assessed liability under employment law)	Termination date/conclusion of the case + 6 months	In case of an employment tribunal claim. Limitation Act 1980 (Section 2)	Secure Disposal
Single Central Records provided for Audit purposes and Reports		Legal obligation and reporting to the DfE For the school to undertake trend analysis	
Recruitment papers including references , medical clearance,	If unsuccessful 6 months	Legal claim timeframe Operation of employment contract	Secure Disposal
Staff – Qualifications and identity	End of Employment	Statutory guidance Keeping Children Safe in Education	Secure Disposal



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DBS check	End of employment	Retain print out from e-dbs only any Risk Assessments due to positive DBS checks should be sealed in restricted access folder DBS Update Service Employer Guide June 2014: KCSIE 2016	Secure Disposal
Right to Work in the UK	End of employment + at least 2 years	Required by statutory guidance Keeping Children Safe in Education and Home Office requirement	Secure Disposal
Prohibition checks	End of employment	Recommended	Secure Disposal
Induction, Probation and Performance Management	End of employment + 6 years	Recommended	Secure Disposal
Contractual documents	End of employment + 6 years	Recommended	Secure Disposal
Pay & Pensions	End of employment + 6 years	Required under pension legislation and TPCD and recommended	Secure Disposal
Maternity Pay records	Current year + 3 years	Statutory Maternity Pay (General) Reg 1986 revised 1999	Secure Disposal



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Leave records	End of employment + 6 years	Recommended (Maternity/Paternity and Adoption as set out in Statutory Maternity Pay Regulations 1986)	Secure Disposal
Sickness Records	End of employment + 6 years	Statutory min 3 years	Secure Disposal
Disciplinary (including capability) and Grievance	Conclusion of case + 6 years	Statutory Guidance Keeping Children Safe in Education and Working Together to Safeguard Children Recommended Papers should be stored with restricted access	Secure Disposal
<b>STUDENTS</b>			
Admissions, Attainment, Attendance Data	Pupil at school + 5 years or until aged 25	Legal obligation and reporting to the DfE For the school to undertake trend analysis	Secure Disposal
Behaviour & Exclusion Data	pupil at school + 5 years	Information may be required by future school settings, in compliance with Local Authority requirements.	Secure Disposal
Identity Management including CCTV	pupil at school + 5 years CCTV – 40 days	Recommended	Secure Disposal
Catering and FSM management	Pupil at school + 5 years or until aged 25	To comply with DfE funding requirements and in compliance with Local Authority requirements	Secure Disposal



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Trips & Activity Information (including Medical and financial information)	Pupil at school + 5 years (for financial information 6 years + 1 for audit purposes) Major medical incident information to be retained until pupil aged 25	To comply with financial audit purposes and possible legal requests.	Secure Disposal
Safeguarding	Until pupil aged 25	Statutory Guidance Keeping Children Safe in Education and Working Together to Safeguard Children Recommended	Secure Disposal
SEN information	Pupil at school + 5 years or until aged 25	Statutory Guidance Keeping Children Safe in Education and Working Together to Safeguard Children Recommended	Secure Disposal
Personal identifiers (i.e. images, contact, biometrics, addresses)	Pupil at school + 5 years	For possible references, requests from future schools,	Secure Disposal
Examination Results	Pupil at school + 6 years	Recommended	Secure Disposal



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Examination Certificates	All uncollected certificates returned to exam board	Recommended	Returned to Exam Board
SATS records	Kept on student record until pupil aged 25	Recommended	Secure Disposal
<b>BOARD / LOCAL GOVERNING BODY</b>			
Agendas for Board and LGB Meetings	One set retained as master	Recommended	Secure Disposal
Final signed Minutes of Board and LGB Meetings	Permanently	Recommended	
Reports presented to Board or LGBs	Permanently	Recommended	
Annual Member Meetings (Agenda, papers and minutes)	Permanently	Recommended	
Articles of Association, Funding Agreements, Memorandum of Understanding	Permanently	Recommended	
Endowments or Funds managed by the Trust	Permanently	Recommended	
Policy Documents	Life of Policy + 3 years	Recommended	Secure disposal
Complaints dealt with by the Trust or LGB	Date of resolution + 6 years and reviewed	Recommended	Secure disposal



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Annual Reports as audited	Date of Report + 10 years	Education (Governor's Annual Reports) (England) (Amendment) Regulations 2002 SI2002 No 1171	Secure disposal
Change of status of Trust/ schools / academies	Date proposal accepted/declined + 3 years	Recommended	Secure disposal
SLT Meeting notes	Date of Meeting + 3 years then review	Recommended	Secure disposal
Correspondence	Date of correspondence + 3 years then review	Recommended	Secure disposal
School Development Plan	Life of Plan + 3 years	Recommended	Secure disposal
School Admissions Policy	Successful admissions on pupil file Unsuccessful appeals until process completed	Recommended	Secure disposal
<b>ADMINISTRATION</b>			
General Files	Current year + 5 then review	Recommended	Secure disposal
Records relating to Parent Staff/Teacher Association	Current year + 6 then review	Recommended	Secure disposal





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Records Relating to accident/Injury at work	Date of incident + 12 years review for further retention period if incident was serious	Social Security (Claims & Payment) Regs 1979 Reg 25, Social Security Admin Act 1992 Section 8, Limitation Act 1980	Secure Disposal
COSHH	Current year + 40 years	COSHH Regs 2002 SI 2002 No 2677 Reg 11. Records kept under 1994 and 1999 regs to be kept as if the 2002 regs had not been made Reg 18(2)	Secure Disposal
Employer's Liability Insurance Certificate	Closure of the school + 40 years	Recommended	Secure Disposal