

# Data Retention Policy

## 1. Purpose

This policy sets out LTS's approach to the retention and disposal of personal data, ensuring compliance with UK GDPR, data protection laws, and safeguarding requirements. It applies to all personal data held about candidates, clients, staff, and third parties.

**The purpose of this policy is to:**

- Ensure personal data is retained only as long as necessary for business, legal, or regulatory purposes
- Protect the rights of individuals whose data is held
- Provide clear guidance on retention periods and secure disposal
- Support compliance with safeguarding requirements for pupils and candidates.

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## 2. Scope

This policy applies to:

- All personal data processed by LTS, including electronic and paper records
- All candidates supplied to schools
- Client records, invoices, contracts, and correspondence
- Staff and supplier records
- All LTS employees, contractors, and volunteers handling personal data.

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## 3. Principles

LTS adheres to the following principles for data retention:

- Lawfulness, fairness, and transparency – data is processed in line with GDPR requirements
- Purpose limitation – data is collected for specified, legitimate purposes only
- Data minimisation – only data necessary for the purpose is retained
- Accuracy – data is kept accurate and up to date
- Storage limitation – data is kept no longer than necessary
- Integrity and confidentiality – data is securely stored to prevent unauthorized access.

## 4. Retention Periods

| Record Type                             | Retention Period                                 | Reason                                       |
|---|--|--|
| Candidate DBS & Update Service records  | 12 months after expiry/superseded DBS            | Safeguarding and compliance verification     |
| Candidate applications, CVs, references | 6 years after last engagement                    | Contractual, legal, and potential claims.    |
| Payroll & finance records               | 6 years  | HMRC and accounting regulations              |
| Client contracts & correspondence       | 6 years after contract end                       | Legal and contractual obligations            |
| Staff records                           | 6 years after employment end date.               | Employment law and claims                    |
| Complaints & safeguarding logs          | 25 years until person reaches 25                 | Safeguarding/statutory guidance for children |
| Marketing and consent data              | Until consent withdrawn or 2 years of inactivity | GDPR/privacy compliance                      |

Note: Where laws, contracts, or school policies require longer retention, LTS will adhere to those requirements.

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## 5. Data Disposal

- When data reaches the end of its retention period:
- Electronic data – securely deleted or overwritten
- Paper records – shredded or destroyed securely
- Disposal methods must ensure data cannot be reconstructed or retrieved.

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## 6. Responsibilities

Compliance Manager / Data Protection Officer: oversees retention schedules, audits, and secure disposal

Managers & Team Leads: ensure staff follow retention periods and report any data stored beyond its period.

All staff: comply with the retention schedule and data disposal procedures

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## 7. Review

This policy will be reviewed at least annually or following any changes in data protection law, school guidance, or LTS processes

Retention schedules will also be audited periodically to ensure compliance

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## 8. Non-Compliance

Failure to follow this policy may result in:

- Corrective action and retraining
  - Formal performance review
  - Disciplinary action in cases of deliberate or repeated breaches.
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Signed: *Eddi Banks*

Position: Director

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