



**LONDON GRID FOR LEARNING (LGfL) RETENTION AND
DISPOSAL SCHEDULE FOR INFORMATION STORED IN
ATOMWIDE SYSTEMS**

Policy ownership & effective dates

Title	LGfL retention and disposal schedule for information stored in Atomwide systems		
Description	This document states how long LGfL customer information will be held in Atomwide systems		
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Introduction

This retention schedule is designed to provide a clear set of rules whereby Atomwide will continue to store LGfL's customer information until the retention period has been reached and the relevant records included in the next available disposal exercise to be undertaken.

Atomwide will carry out the disposal according to this schedule on a regular basis in line with its contractual obligations and its regulatory obligations such as the General Data Protection Regulation.

Document Control

Any changes to the retention schedule must be agreed by LGfL and signed off by the CEO's office, who may seek advice from the Records Manager or the Data Protection Officer.

Version control of this retention schedule is vital, and any changes must be recorded in the Document Control box above. Previous versions must be retained indefinitely in order for decisions around the destruction of records to be understood by future enquiries.

Destruction of records

All disposal of records must be carried out in such a way that they are not retrievable at a later date in normal day to day operations. For example, system 'recycle bins' and local caches should be emptied.

Where tapes are used these should be overwritten.

Any media or systems that contain sensitive information should have relevant procedures applied to ensure no information is retrievable by any means, prior to physical disposal.

A log of destruction will be recorded stating:

- The retention reference;
- What/how many records were deleted; and
- The authorising officer.

Reviewing records

Where records have been marked in the retention schedule as **ACTION = DESTRUCTION (D)**, Atomwide, alongside the relevant LGfL asset owner, will carry out an assessment of records to be deleted to ascertain whether any ongoing legal investigations or enquiries are active, whereby records need to be retained beyond the retention period.

Records that need to be retained are not to be destroyed and a record of the reasons for retention maintained with the relevant files. For example, if any information is required to support legal proceedings.

Where records have been marked in the retention schedule as **ACTION = REVIEW (R)**, a micro appraisal is needed, whereby much more emphasis is placed on the contents of the records and a document by document check is required prior to disposal.

The academic year is from the 1st September to the following 31st August.

Retention Schedule Table

Reference Number	Records Name	Records Type	Time period	Retention Trigger	Action	Justification
LG1.1	Web Server Logs	For all learning resources, other content, and services (e.g. ADFS servers, LGfLaai Federation)	Current academic year + 2	Academic year start	D	Required to provide support to customers and usage stats of content. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG1.2	Windows Media Services Logs	Streaming video service	Current academic year + 2	Academic year start	D	Required to provide support to customers and usage stats of content. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG1.4	Internet Filtration Logs	Internet usage logs	Current academic year + 1	Academic year start	D	Required to provide support to customers and for customers to run reports. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018. The LGfL Safeguarding board recommended the retention period.

LG1.5	IdP Access Logs	Identity management authentication logs	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG1.6	LDAP / RADIUS Auth Logs	e.g. Wi-Fi	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG1.7a	Remote Desktop Protocol (RDP) Logs	RDP Gateway logs	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG1.7b	Remote Access	Remote computer access logs	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.

LG1.10a	Email Protection Archive Databases	Historic Message flows	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG1.10b	Email Protection Rolling Live Log	Live searchable logs (UI)	32 days	From Creation	D	Defined by usability of the system.
LG2.1	Schools Backups	Backup of schools data	Set by school	From Creation	D	Defined by the individual customers.
LG2.2	Core Systems Backups	Backup of core systems	3 weeks	From Creation	D	Defined by the amount of available storage.
LG3.1	Email Backup	DR Unit	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG3.4	Email Archive	Email recovery platform for schools	Current academic year + 1	Academic year start	D	The email archive is designed to help customers easily restore emails that may have been accidentally deleted and for schools to have evidence of an email being sent. The current academic year plus an additional year is a reasonable amount of time to have emails restored using this application.

LG3.5	Mailbox Statistics	Historic Statistics of mailbox sizes / last accessed time	Current academic year + 1	Academic year start	D	Required for capacity planning and 1 year is sufficient for this purpose.
LG3.6	Client Access Logs (SQL)	Historic log of access to mailboxes (condensed)	Current academic year + 1	Academic year start	D	To provide information to customers for who has been accessing mailboxes.
LG3.7	Client Access Logs (Flat files)	Historic log of access to mailboxes (full file)	Current academic year + 1	Academic year start	D	To provide information to customers for who has been accessing mailboxes.
LG3.8	SMTP Logs	Log of sent emails	Current academic year + 1	Academic year start	D	To provide information to customers for who has been accessing mailboxes to send emails.
LG3.9	Message Tracking Logs	Log of messages	Current academic year + 1	Academic year start	D	To provide information to customers for who has been accessing mailboxes.
LG3.10	Alias Change Log	Includes Google / O365	1 academic year	From closure of mailbox	D	To provide information to customers relating to access to email aliases.
LG3.11	Email Mailbox	Emails held in the Mailbox	Customer Defined	Customer Defined	N/A	LGfL does not manage the content of email mailboxes. It is the responsibility of the user of the mailbox and the school to manage their data in line with their local procedures. Or, delete data upon request of the data controller.

LG1.9	Email List Server Logs	Email distribution logs	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG4.1	eAdmissions Database	All records of current and previous applications and results	Current academic year + 2	Academic year start	D	A recommendation from the LIAAG Strategy Group for storing school application history for pupils.
LG4.2	eAdmissions XML Files	Data transferred between systems	Current academic year + 2	Academic year start	D	A recommendation from the LIAAG Strategy Group for storing school application history for pupils.
LG4.3	Document Exchange Audit log	Log of uploads / downloads (not data)	From file upload + 1 year	File upload	D	System designed to be a file transfer system, not a storage solution.
LG4.4	Document Exchange (Data)	Documents	Auto delete after 1 year from file upload	File upload	D	System designed to be a file transfer system, not a storage solution.
LG4.5	Squirrel Database	Record of emails sent from the eAdmissions database	Current academic year + 2	Academic year start	D	A recommendation from the LIAAG Strategy Group for storing emails sent to parents from the eAdmissions system.

LG5	USOSync (text file)	Audit logs of user account changes	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG6	AutoUpdate	Statistics of updates from schools MIS	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG7.1	Authentication / Attribute Release Logs	Customer account login logs	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG7.2	User Change Log	Changes to USO accounts	Current academic year + 1	Deletion of USO account	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.

LG7.3	Record of Deleted Accounts	Log of previously used usernames	Current academic year + 1	Deletion of USO account	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG8.1	USO-FX Audit Log	Log of uploads / downloads (not data)	From file upload + 1 year	File upload	D	System designed to be a file transfer system, not a storage solution.
LG8.2	USO-FX Data	Documents	Auto delete after 1 year from file upload	File upload	D	System designed to be a file transfer system, not a storage solution.
LG9.1	ISDN and C20	Machine readable Logs	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG9.2	CDR	Call records	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.

LG10	WebEx	WebEx conference records	Current academic year + 1	Academic year start	D	Required to provide support to customers. Will also support the typical types of enquiries received by law enforcement agencies, for example, a request from the police pursuant to IPA 2018.
LG11	Support Cases	Current and historic record of all support cases	1 year	Date of customer exit	D	Retain while school is active customer as it provides historical evidence of support cases raised by customers on the LGfL Support Site.
LG12	Pupil Premium Checker	Record of all applications made	25 years of age	From D.O.B. or pupil no longer in an LGfL supported school	D	If data is removed from the Pupil Premium Checker, a school would have to enter the information each time a retention trigger is met making the system harder to use and will mean less income for schools. Data will be removed if a pupil leaves an LGfL supported school. Or, delete data upon request of the data controller if deletion required before the disposal date.

LG13.1	Parent USO Accounts	USO account used to apply for school places and eligibility checker	3 years of being inactive	Academic year start	D	Retain while in active use but delete if it has not been used for 3 years. A parent may need to apply for another place for a sibling or another school for the same pupil, typically within 3 years. Or, delete account upon the request of the account holder if deletion required before the disposal date.
LG13.2	Teacher and Governor USO Accounts	USO account used by teachers & governors to access LGfL services	1 year of not being associated with an MIS	Academic year start	D	Retain while in active use. If the USO account is not associated with a school MIS system for a year, it is assumed that the account is no longer required. LGfL does not manage any data associated with the account. It is the responsibility of the user and the school to manage their data in line with their local procedures. Or, delete account upon request of the data controller if deletion required before the disposal date.

LG13.3	Pupil USO Accounts	USO account used by pupils to access LGfL services	6 months of not being associated with an MIS	Academic year start	D	Retain while in active use. If the USO account is not associated with a school MIS system for 6 months, it is assumed that the account is no longer required and data will be deleted. Or, delete account upon request of the data controller if deletion required before the disposal date.
LG13.4	3PSO USO Accounts	USO account used by 3 rd party support organisations to support LGfL customers	1 full academic year of being inactive	Academic year start	D	Retain while in active use. Disable after 6 months of inactivity and automatically delete if not used for a further 6 months. Or, delete account upon request of the 3 rd party support organisation if deletion required before the disposal date.
LG14	MyUSO Data (MyDrive)	Customer data held in MyUSO	Customer defined	Customer defined	N/A	LGfL does not manage the contents of a user's MyUSO data. It is the responsibility of the user and the school to manage their data in line with their local procedures. Or, delete data upon request of the data controller.

LG15.1	LGfL.net personalisation	Customer data used for personalising LGfL website	1 year	Date of customer exit	D	Retain while associated with a USO account. Delete if school leaves LGfL services or if customer not associated with a USO account. While associated with a school subscribing to LGfL services, the personalisation will save links to LGfL resources. If the customer is no longer associated with a USO account, it is assumed the teacher no longer works in an LGfL school or the school subscribes to LGfL services.
LG15.2	LGfL Training	List of training courses attended by LGfL customers.	1 year	Date of customer exit	D	Retain for school existence. Anonymise if customer leaves LGfL services to establish usage patterns of training courses. Customers can view any LGfL training they have attended and print any certificates attained. Not required if customer leaves LGfL services.
LG16	Customer My Stats Data	Customer usage of LGfL systems	1 year	Date of customer exit	D	Retain for school existence. Anonymise if customer leaves LGfL services. Establishing longer term usage patterns of LGfL services by customers