

Title	Records Retention Policy and Retention Schedule
Cross References	External: • UK General Data Protection Regulation (UK GDPR) • Data Protection Act 2018 • Data (Use and Access) Act 2025 • DfE Data Protection in Schools – Record Keeping and Management (Updated July 2026) • ICO Storage Limitation Guidance Internal: • Data Protection and Privacy Policy • Information Rights Policy • Data Breach Policy • Confidentiality Policy • Clear Desk and Screen Policy • Child Protection and Safeguarding Policy • Health and Safety Policy • Information Security / IT Security Policy
Date	October 2026

1. Purpose

Apricot Online Ltd creates and receives records in order to deliver online alternative provision, safeguard children and young people, manage staff and contractors, meet contractual and legal obligations, demonstrate the quality of its work and operate effectively.

This policy establishes how long records should normally be retained, when they should be reviewed, and how they should be securely disposed of. It supports the UK GDPR storage limitation principle: personal data must not be kept in identifiable form for longer than is necessary for the purpose for which it is processed.

The retention schedule at Appendix 1 provides Apricot's standard working retention periods. It is designed for Apricot's role as an online alternative-provision provider and should not be treated as though Apricot were always the pupil's maintaining school. Where a commissioning school or local authority remains the official record holder, Apricot will retain its own records only for as long as it has a lawful, safeguarding, contractual or operational reason to do so.

2. Scope

This policy applies to records in all formats, including records held in Apricot systems, cloud platforms, email, shared drives, student information systems, learning platforms, online meeting systems, audio/video recordings, portable devices and paper files.

It applies to directors, employees, teachers, contractors, consultants and any other person who creates, receives, stores or disposes of Apricot records.

3. Principles

- Records will be retained only where there is a clear legal, safeguarding, contractual, regulatory or operational reason.
- Retention periods will be documented and capable of justification.
- Apricot will distinguish between its own records and records for which a commissioning organisation remains the principal or statutory record holder.
- Records will be accurate, appropriately organised and accessible to authorised people while required.
- Access will be restricted according to role, confidentiality and need.
- Records subject to a safeguarding concern, complaint, investigation, litigation, insurance matter, regulatory enquiry, information-rights request or other preservation requirement will not be destroyed merely because the normal retention period has expired.
- Where records are no longer required, they will be securely deleted, destroyed or irreversibly anonymised.
- Apricot will review retention arrangements at least annually.

4. Responsibilities

4.1 Operations Director

The Operations Director has overall operational responsibility for this policy and the retention schedule, including approving changes to standard retention periods, authorising exceptional retention or disposal where necessary, and ensuring that retention arrangements align with data-protection, safeguarding and contractual requirements.

4.2 Staff and contractors

Everyone creating or handling Apricot records must store them in approved locations, follow the retention and disposal requirements relevant to their role, avoid creating unnecessary duplicate copies, and escalate uncertainty before deleting potentially important information.

4.3 Record owners

Managers or designated record owners are responsible for ensuring that records within their area are reviewed and disposed of in accordance with this schedule and that any reason for exceptional retention is documented.

5. Starting the Retention Period

Unless the schedule states otherwise, a retention period begins when the relevant activity or relationship ends, the record is superseded, or the matter is closed. Examples include the end of a student's Apricot placement, the end of employment or engagement, the closure of a complaint or safeguarding matter, the expiry of a contract, or the replacement of a policy.

Where more than one retention rule could apply, the longest justified period should normally be used, provided there remains a lawful basis for retaining the information.

6. Safeguarding and Child Protection Records

Safeguarding information requires particular care. Apricot will maintain clear records of concerns, decisions, actions and information shared. Safeguarding records will be kept separately or logically separated from routine educational information with access restricted to those who need it.

Because Apricot frequently works on behalf of commissioning schools and local authorities, safeguarding information must be shared promptly with the appropriate safeguarding lead or statutory agency where required. Apricot's copy will then be retained in accordance with the schedule and any specific instruction arising from the case.

No safeguarding record will be destroyed solely because a placement has ended where an active concern, allegation, investigation, legal claim, regulatory matter or other continuing safeguarding reason exists.

7. Student Education and Placement Records

Apricot is not automatically the statutory custodian of a pupil's complete education record. The commissioning school or local authority will often remain responsible for the formal pupil record. Apricot will therefore retain the records it creates or needs to evidence delivery, progress, attendance, safeguarding, SEND support, commissioning requirements and contractual performance.

Where Apricot receives copies of documents such as EHCPs, risk assessments, medical information or school records, staff should avoid retaining unnecessary duplicates once the information is no longer required for the placement, subject to safeguarding, contractual and legal needs.

8. Lesson Recordings and Online Meeting Records

Lesson or meeting recordings are high-volume records that may contain student images, voices, work, personal information or safeguarding information. They must have a defined purpose and must not be kept indefinitely simply because storage is available.

Routine recordings used for safeguarding or quality assurance should be deleted after the standard period in the schedule unless a recording has been identified as relevant to a safeguarding concern, complaint, allegation, investigation, quality issue or legal matter. Where this occurs, the relevant recording must be preserved with the associated case record until the matter and any applicable retention period have concluded.

9. Email and Messaging

Email and approved messaging systems are communication tools, not permanent filing systems. Where an email or message forms evidence of a decision, safeguarding action, complaint, contract, placement decision or other material business activity, the relevant information should be stored with the appropriate record where practicable.

Routine or transitory messages should be deleted when no longer required. Staff should not keep entire mailboxes indefinitely as a substitute for records management.

10. Retention Holds and Exceptional Retention

Normal deletion must be suspended where Apricot knows or reasonably expects that records may be required for:

- a safeguarding or child-protection matter;
- an allegation against a member of staff or contractor;
- a complaint, grievance, disciplinary or capability matter;
- litigation, threatened litigation or an insurance claim;
- a police, local authority, regulator, awarding-body or professional-body investigation;
- a Subject Access Request or other information-rights request that is being handled;
- an audit, contractual dispute or commissioner review; or
- another legal or regulatory requirement.

The reason for the hold, the records affected and the date the hold is lifted should be documented. Once the hold ends, the normal retention schedule should be reapplied.

11. Secure Disposal

Records containing personal, confidential, safeguarding or commercially sensitive information must be disposed of so that the information cannot reasonably be reconstructed or recovered.

- Paper records must be cross-cut shredded or destroyed through an approved confidential-waste service.
- Electronic records must be securely deleted from active systems and, where appropriate, from devices or storage media in accordance with Apricot's technical arrangements.
- Physical storage media containing confidential information must be securely destroyed or sanitised before disposal or reuse.
- Where an external destruction provider is used, appropriate contractual and security assurances should be in place and evidence of destruction retained where appropriate.
- Deletion from a user's view is not always the same as secure deletion; system-specific retention, backup and deletion arrangements must be understood.

Apricot will keep an appropriate record of significant scheduled destruction activity, including the category of records destroyed, the date and the person authorising or completing the disposal.

12. Backups

Backup copies exist primarily for resilience and disaster recovery and should not be used as an alternative archive. Where deleted information remains temporarily within a backup cycle, it must remain protected and should not ordinarily be restored except for legitimate recovery purposes. Backup retention should be documented within Apricot's information-security arrangements.

13. Anonymisation

Where Apricot has a legitimate need to retain information for statistical, trend, quality-improvement or historical analysis after identifiable records are no longer required, information should be irreversibly anonymised where practicable. Pseudonymised information may still be personal data and is not treated as anonymous merely because a name has been replaced by a code.

14. Review and Audit

Apricot will review the retention schedule annually and whenever significant changes in law, DfE or ICO guidance, safeguarding requirements, technology, contracts or organisational practice occur. Record owners should periodically review the information they hold and securely dispose of material that has reached the end of its retention period.

Retention periods in this document are default periods. If a different period is required by a contract, statutory requirement or specific case, the reason must be documented.

Appendix 1 – Apricot Records Retention Schedule

A. Student, Placement and Teaching Records

Record type	Standard retention period	End action	Notes / trigger
Student registration / core placement record	6 years after the placement ends	Secure disposal	Apricot working record. Longer retention may apply where linked to safeguarding, complaint or legal matter.
Commissioner referral, placement agreement and key correspondence	6 years after the placement/contract ends	Secure disposal	Supports contractual evidence and placement history.
Attendance and engagement records	6 years after the placement ends	Secure disposal	Apricot delivery record; commissioner may retain the statutory school attendance record.
Progress reports, assessment records and teacher reports	6 years after the placement ends	Secure disposal	Retain sufficient evidence of provision and outcomes.
Student work / routine submitted assignments	End of academic year + 1 year	Secure deletion	Unless required for qualification evidence, complaint, moderation or another documented purpose.
Exam / qualification evidence held by Apricot	In accordance with awarding-body requirements; otherwise 6 years after completion	Secure disposal	Awarding-body rules take precedence.
EHCPs, SEND plans and copied support documents	Placement ends + 1 year, then review	Secure disposal or retain with relevant case record	Do not keep duplicate source documents longer than needed; retain longer if needed to evidence provision or linked to a dispute/safeguarding matter.
Medical / health information used to support the placement	Placement ends + 1 year, then review	Secure disposal	Longer only where required for safeguarding, incident, claim or continuing legal reason.
Student risk assessments / SIRA records	6 years after placement ends	Secure disposal	Retain with relevant placement/safeguarding evidence.
Routine lesson recordings	90 days	Secure deletion	Unless identified for safeguarding, complaint, allegation, QA investigation or legal hold.
Routine lesson chat / meeting logs where separately retained	1 academic year after placement ends	Secure deletion	Material evidence should be transferred to the appropriate case/placement record.

B. Safeguarding, Welfare and Behaviour Records

Record type	Standard retention period	End action	Notes / trigger
Child protection / safeguarding concern records created by Apricot	Until the young person's 25th birthday as a default, then review	Secure disposal	Where the commissioning organisation holds the principal safeguarding file, Apricot retains its provider record. Preserve longer where case circumstances, inquiry, allegation or legal advice require.
Safeguarding referrals and information-sharing records	Until the young person's 25th birthday as a default, then review	Secure disposal	Keep evidence of what was shared, with whom, when and why.
Allegations against staff / contractors	Until the accused person reaches normal pension age or 10 years from the allegation, whichever is longer, unless a different legal/safeguarding requirement applies	Secure disposal after review	Do not destroy while any investigation, referral, claim or safeguarding reason remains active.
Low-level concerns records	Review at end of employment/engagement and retain where proportionate to safeguarding need	Secure disposal when no longer necessary	Patterns and links to allegations must be considered before disposal.
Behaviour / serious incident records	6 years after placement ends	Secure disposal	Longer if linked to safeguarding, exclusion, complaint, claim or police matter.

C. Complaints, Information Rights and Data Protection

Record type	Standard retention period	End action	Notes / trigger
Complaints and complaint investigation records	6 years after complaint closure	Secure disposal	Longer where litigation, safeguarding or regulatory action is ongoing.
Subject Access Requests and responses	3 years after request closure	Secure disposal	Retain enough to evidence handling and decisions.
Other individual-rights requests	3 years after request closure	Secure disposal	Includes rectification, erasure, restriction and objection requests.
Personal data breach records	6 years after closure	Secure disposal	Includes incidents not reported to the ICO; longer where claim or regulatory action continues.
DPIAs	Life of processing/activity + 6 years	Secure disposal	Retain superseded versions where needed to evidence decisions.
Data-sharing / processing agreements	Contract/arrangement ends + 6 years	Secure disposal	Keep with associated contract.
Record of processing activities / information asset register	Current version plus 6 years of superseded material where needed to evidence compliance	Secure disposal	Review at least annually.

D. Staff, Recruitment and Contractor Records

Record type	Standard retention period	End action	Notes / trigger
Unsuccessful applicant recruitment records	6 months after recruitment decision	Secure disposal	Extend only where there is a documented reason, dispute or legal hold.
Successful applicant recruitment / vetting records	Transfer relevant material to personnel record; dispose of unnecessary duplicates promptly	Secure disposal	DBS certificate information is subject to specific handling rules.
DBS certificate copies, where exceptionally retained	Normally no longer than 6 months after recruitment decision	Secure disposal	Retain only where lawful and necessary; keep the required recruitment/check record rather than unnecessary certificate copies.
Single Central Record / safer recruitment check record	Duration of employment/engagement + 6 years	Secure disposal	Subject to safeguarding and legal holds.
Personnel / employment record	6 years after employment ends	Secure disposal	Some specific records below may require different periods.
Payroll and PAYE records	Current tax year + 3 complete tax years minimum; Apricot may retain for 6 years for business/tax evidence	Secure disposal	Finance/accounting requirements may justify the longer operational period.
Sickness / absence records	6 years after employment ends	Secure disposal	Restrict access; contains health information.
Training / CPD records	Employment/engagement ends + 6 years	Secure disposal	Safeguarding training evidence may be relevant to later enquiries.
Performance management / capability / disciplinary / grievance records	6 years after employment ends or case closure, whichever is later	Secure disposal	Subject to Employee Handbook rules and any legal hold.
Contractor agreements and key contractor records	6 years after contract ends	Secure disposal	Longer if deed or specific contractual term requires.

E. Finance, Contracts and Corporate Records

Record type	Standard retention period	End action	Notes / trigger
Invoices, accounts and core accounting records	6 years after the end of the relevant financial year	Secure disposal	Subject to tax/accounting requirements.
Client / commissioner contracts signed as simple contracts	6 years after expiry/termination	Secure disposal	If executed as a deed, obtain advice on the longer limitation period.
Supplier contracts	6 years after expiry/termination	Secure disposal	Retain longer if required by contract or dispute.
Insurance policies and claims records	Policy/claim closure + 6 years	Secure disposal	Longer where insurer requires or claim remains possible/active.
Policies and procedures	Current version plus 6 years after superseded	Secure disposal / archive selected key versions	Keep approval/version history.
Board / director formal decisions and minutes	Permanent or long-term corporate archive	Review / preserve	Retain core governance history where appropriate.
Routine operational meeting notes	2 years after meeting	Secure disposal	Material decisions should be transferred to the relevant permanent/longer-lived record.
Marketing consent	Duration of consent/use	Secure disposal	Retain evidence of

records	+ 6 years evidence where necessary		consent/withdrawal only as long as justified.
General enquiries that do not lead to a placement or contract	12 months after last contact	Secure deletion	Longer only where complaint, safeguarding or legal reason exists.

F. Health, Safety and Operational Records

Record type	Standard retention period	End action	Notes / trigger
Accident / incident records involving students or visitors	6 years after incident; for a child, retain at least until their 21st birthday and review whether longer is required	Secure disposal	Claims or safeguarding matters override normal deletion.
Employee accident records	6 years after incident or longer where a claim/regulatory matter requires	Secure disposal	RIDDOR and other specific records may have statutory minima.
Risk assessments	Current version + 3 years after superseded	Secure disposal	Student-specific risk records follow the student risk-assessment period above.
Business continuity / emergency plans	Current version + 3 years after superseded	Secure disposal	Keep evidence of significant exercises/incidents as required.
System access / security logs	12 months by default	Secure deletion	May vary by system, risk and security need; extend where investigating an incident.
Visitor / access records for any physical premises or events	12 months	Secure disposal	Unless linked to safeguarding, security or incident investigation.

Appendix 2 – Disposal and Review Record

For significant scheduled disposal exercises, Apricot should record sufficient information to demonstrate that disposal was authorised and completed appropriately.

Record category	Period covered	Disposal date	Method	Authorised / completed by

15. Policy Review

This policy and schedule will be reviewed annually and sooner where legislation, statutory guidance, safeguarding practice, contractual arrangements or Apricot systems change. The schedule should be treated as a controlled document and any material change to a retention period should be recorded and approved.

Authorised by: Jodie Phillips, Operations Director

Date: October 2026

Review Date: October 2027