

Data Retention and Deletion Policy

Effective date: 25 July 2026

Approved by: Board of Trustees

1. Purpose

This policy explains how long we keep personal data and when we delete or destroy it. It is designed to comply with UK GDPR and the Data Protection Act 2018.

We keep personal data only for as long as we need it, and we keep only what is necessary.

2. Who this applies to

This policy applies to personal data we hold about:

- students and alumni
- research clients
- people who have informally deposited family history or research materials
- anyone else whose personal data we process in the course of our educational and research work

It applies to information held in any format, including paper and electronic records.

3. Our principles

- We keep personal data only while there is a genuine need to do so.
- We keep only the minimum information necessary.
- Our retention periods are clear and consistent.
- Where we keep some data for longer (alumni core records), we apply extra safeguards.
- When data is no longer needed, we delete or destroy it securely.

4. How long we keep your data

Students and alumni

If we award you a qualification, we keep a **minimal core record indefinitely**. That record contains only:

- student number

- full name
- year of enrolment
- qualification awarded
- date of award

We keep this so we can verify awards, issue replacements where appropriate, and maintain an accurate historical record.

All other student information — including incomplete student records, progress summaries, module marks, correspondence, application materials, and supporting documents — is kept for a **maximum of six years** from the latest of:

- course completion
- final examination
- certificate issue
- last recorded activity with us

After that, it is securely deleted. We do not keep any extra “core” record for students who have not been awarded a qualification.

Research clients

Personal data relating to a research project is kept for a **maximum of six years** from the last engagement or the completion of the project, whichever is later. After that, it is securely deleted.

Informal deposits of family history or research materials

If you have left materials with us informally (not as part of a paid research commission):

- we will try to return them to you, or to a known representative
- if we cannot return them after reasonable notice, they will be securely destroyed
- we do not keep these materials permanently

5. How we delete data

When a retention period ends, we permanently and securely delete or destroy the data so that it cannot be reconstructed.

6. Your rights

You have rights under data protection law, including the right to:

- access your personal data
- ask us to correct inaccurate data
- ask us, in certain circumstances, to delete or restrict data

We may refuse a request to delete the alumni core record described above if we still need it to verify a qualification or maintain our historical record.

For more information about how we use personal data, please see our Privacy Notice. To exercise your rights, or if you have questions about this policy, contact our Data Protection Officer at [insert email address].

7. Legal basis for longer retention of alumni core data

The indefinite retention of the minimal alumni core record is permitted under UK GDPR Article 5(1)(e) and Article 89, because it is necessary for archiving in the public interest and historical research purposes, with appropriate safeguards.