

Data Retention and Archiving Policy

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Data Retention and Archiving Policy

Document Metadata

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1. Purpose

This policy sets out how the Western Equestrian Society (WES) retains, reviews, and securely disposes of records and personal data. It supports compliance with UK GDPR, meets legal obligations, and ensures that WES holds only what it needs — no more, no less.

The goal is to maintain data that is useful, lawful, and proportionate to our activities, while archiving or deleting older records in a secure, structured, and justifiable way.

2. Scope

This policy applies to all digital and physical data held by WES, including:

- Membership and contact records
- Event and clinic registrations
- Financial and transaction data
- Council documentation (minutes, agendas, decisions)

- Safeguarding, disciplinary, and complaints files
- Marketing or mailing list data
- Shared drive and archived folders

It applies to all Officers, Council members, and authorised volunteers managing or storing Society records.

3. Definitions

- **Retention Period:** The minimum or maximum time a record is kept before being reviewed, archived, or deleted
- **Archiving:** Moving a document out of active use but retaining it securely for compliance, governance, or historical value
- **Deletion:** Permanent removal of a document or data record
- **Personal Data:** Any information relating to an identifiable living person

4. Policy Statement

WES will only retain personal data and documents for as long as there is a clear operational, legal, or governance need. Where retention is no longer necessary, records will be securely deleted or archived. The Secretary is responsible for ensuring that retention periods are adhered to, documented, and reviewed annually.

5. Roles and Responsibilities

Role	Responsibility
Secretary	Maintain and review the Retention Schedule; coordinate data deletion/archiving cycles
Treasurer	Ensure financial records are retained in line with HMRC and audit standards
Youth Officer	Maintain secure records relating to safeguarding within defined timescales
All Officers	Tag or name files clearly; avoid duplication or over-retention

6. Policy Detail / Procedures

6.1 Retention Schedule

WES will follow the retention periods below unless a legal or operational reason exists to extend them:

Record Type	Retention Period	Rationale
Membership and contact data	Indefinite	Supports future renewals
Event and clinic bookings	10 years	Historical record
Financial records	6 years	HMRC compliance
Council meeting minutes and decisions	Permanent (archive)	Governance / audit / historical record
Show results and awards	Indefinite	Points accumulation
Disciplinary and complaints records	6 years from closure	Legal risk, pattern tracking
Safeguarding case files (if held)	10 years minimum	Best practice (can be longer if advised)
Emails and correspondence	6 years	Operational reference
Volunteer declarations and policies	Until superseded +1 year	Audit and verification trail
Mailing list / newsletter consents	Until unsubscribed	Consent-based contact only

6.2 Archiving Standards

- Archived documents must be clearly labelled and stored in the “_Archive” subfolder within the relevant data room category
- Archived files must not be edited without restoring to active folder and documenting the change
- The Secretary will conduct an annual archive check and remove expired records

6.3 Deletion Procedures

- Deletion will be permanent and irretrievable
- Physical documents will be shredded or securely destroyed
- Digital deletions must be confirmed by the responsible Officer and logged by the Secretary where personal data is involved

6.4 Data Minimisation and Duplication

- WES Officers must avoid holding multiple copies of the same file in different locations
- Personal data should not be retained in email or informal spreadsheets once the official source record is available
- The use of shared drives is encouraged to prevent shadow storage or version loss

7. Related Policies and References

- Data Protection (GDPR) Policy
- Subject Access Request Procedure
- Confidential Records Protocol
- Financial Controls Policy
- WES Retention Schedule and Archive Log (Templates and Tools folder)

8. Compliance and Breach Handling

Failure to follow this policy may result in:

- Over-retention of personal data in breach of UK GDPR
- Loss of records required for governance or audit
- Inadvertent disclosure through poor archiving or deletion practices

Breaches must be reported to the Secretary. Repeated non-compliance may result in a review of access permissions or escalation through the Disciplinary Procedure.

9. Review and Version Control

Version	Date	Author	Changes Made
0.1	18/07/2025	DG	Initial policy draft
0.5	08/10/2025	DG	Changes following chairmans review
1.0	04/11/2025	DG	Published

10. Approval Record

Approved By	Date	Notes
Full Council	04/11/2025	Approved for immediate use