

1. Purpose

This policy outlines The Pony Club's approach to the retention and disposal of personal data, in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance from the Information Commissioner's Office (ICO).

2. Scope

This policy applies to all personal data processed by The Pony Club, including that of members, guardians, volunteers, employees, event attendees, and service providers.

3. Principles

We adhere to data protection principles including: lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, and confidentiality.

4. Data Retention Periods

Data Type	Retention Period	Reason / Justification
Member personal data on the CRM (children and guardians)	Unlimited	To allow for queries, renewals, track historical participation (e.g. at tests, rallies and events).
Emails/correspondence with personal references in	2 years from the date of email/correspondence	To allow for queries, renewals, or disputes while minimising long-term data storage.
Event attendance and consent forms (including medical info)	1 year after the event	Minimal retention per ICO guidance unless linked to an incident.
Safeguarding records	75 years	In line with child protection best practices and legal requirements.
Accident/incident reports	6 years (or until age 25 if child involved)	Legal limitation period under UK law.
Staff and volunteer records	6 years after role ends	To support reference requests and legal claims (e.g., employment disputes).
Financial records (e.g., invoices, donations, expense claims)	6 years	Required by HMRC and for accounting audits.
DBS checks (record of check only – not certificate)	Duration of role + 6 months	ICO recommends minimal retention of sensitive data.
Email/newsletter subscribers	Until consent withdrawn or 2 years of inactivity	To comply with PECR and GDPR consent requirements.
CCTV footage (if used)	30 days unless required for investigation	To comply with ICO guidance on surveillance data.

5. Data Disposal

All data will be securely disposed of once it is no longer required.

- Digital data will be permanently deleted using secure deletion software.
- Paper records will be shredded or destroyed using secure disposal methods. Where appropriate, data will be anonymised instead of deleted.

6. Responsibilities

The Governance Officer or relevant staff member is responsible for overseeing compliance with this policy. All staff and volunteers are required to follow retention guidance and report any concerns.

7. Review and Updates

This policy will be reviewed annually, or earlier if there are changes to relevant legislation or operational needs.

- **Last Updated:** [XXXX]
- **Next Review Due:** [XXXX]