



Aylesbury Squash Data Retention Policy

1. Purpose

The purpose of this policy is to outline how Aylesbury Squash manages the retention and disposal of personal data. The club is committed to retaining personal data only for as long as necessary, in accordance with legal, regulatory, and operational requirements. This policy ensures compliance with the UK GDPR and the Data Protection Act 2018.

2. Scope

This policy applies to all personal data processed by the club, including data relating to:

- Members (current and former).
- Event participants.
- Staff, volunteers, and contractors.
- Visitors and users of the club's website.

3. Retention Principles

Aylesbury Squash follows these principles regarding data retention:

- Personal data is kept only for the period necessary to fulfil the purpose for which it was collected.
- Retention periods are determined by legal, regulatory, and operational requirements.
- Data that is no longer required is securely destroyed or anonymised.
- Regular reviews are conducted to ensure compliance with this policy.

4. Categories of Data and Retention Periods

The club retains personal data for different periods, depending on the type of data and its purpose. The following categories outline typical retention periods:

- **Membership Data:**
 - Retention Period: **Membership duration + 3 years**
 - Reason: For administrative purposes and to handle any queries after membership termination.
- **Financial Records (including payments and invoices):**
 - Retention Period: **7 years**
 - Reason: Compliance with HMRC regulations and audit requirements.

- **Event Registration and Participation Data:**
 - Retention Period: **Event date + 2 years**
 - Reason: Record-keeping for future event organisation and communication, unless consent is given for a longer retention (e.g., for promotional purposes).
- **Health and Safety Records (e.g., accident reports):**
 - Retention Period: **3 years after the event** or longer if legally required (e.g., in the case of accidents involving minors, data may need to be retained until the individual reaches the age of 21).
 - Reason: Compliance with health and safety regulations and potential legal claims.
- **Safeguarding Records (for child or vulnerable adult protection):**
 - Retention Period: **Indefinitely, where necessary**
 - Reason: Legal and regulatory compliance regarding safeguarding obligations.
- **Staff and Volunteer Employment Data:**
 - Retention Period: **Duration of employment/engagement + 6 years**
 - Reason: For compliance with employment law and to resolve potential employment disputes.
- **CCTV Footage:**
 - Retention Period: **30 days**
 - Reason: Ensuring security and for use in incident investigations, in accordance with CCTV regulations.
- **Email and Communication Records:**
 - Retention Period: **24 months** after termination of the communication.
 - Reason: Administrative efficiency and audit trails for club-related inquiries and disputes.

5. Secure Disposal of Data

Once personal data has reached the end of its retention period, it will be securely disposed of to prevent unauthorized access or data breaches. Methods of secure disposal include:

- **Electronic Data:** Permanently deleting files and wiping data from storage devices.
- **Paper Data:** Shredding or incinerating documents.

6. Anonymisation

In some cases, where it is appropriate and lawful, personal data may be anonymized and retained for longer periods for statistical or historical analysis.

7. Data Subject Rights

Individuals have the right to request the erasure of their personal data, subject to certain exceptions where retention is required by law or where it is in the club's legitimate interest to retain it for longer periods (e.g., financial records, safeguarding).

8. Data Breach and Retention

In the event of a data breach, the club will assess any impact on its data retention obligations and make adjustments where necessary, while complying with the UK GDPR's breach notification requirements.

9. Responsibilities

- **Data Protection Officer (DPO) / Club Secretary:** Responsible for overseeing the implementation of this policy, ensuring compliance with data retention periods, and conducting regular reviews of retained data.
- **Club Committee Members and Staff:** Responsible for adhering to this policy when processing personal data.

10. Policy Review

This policy will be reviewed annually or sooner if there are changes in the club's data processing activities or relevant data protection legislation.

Signed:

Oliver Field – Squash Chair

19/06/2025
