



Data Retention Policy

Policy Owner: General Secretary
Date Approved: 11/11/2025
Review Date: November 2028

UKPSA DATA RETENTION POLICY

Reference:

UKPSA Policy Statement for the processing, storage and handling of Personal Data.

Retention of records policy

1. Introduction

1.1 This Retention of Records Policy has been approved by the Council of the United Kingdom Practical Shooting Association (hereafter referred to as the Association). Due to the current charitable status of the Association, it is not required to be registered with the Office of the Information Commissioner.

1.2 The Retention of Records Policy will enable the Association to comply with the requirements of data protection legislation and supports the specific policy statement regarding the processing, storage and handling of personal data at Reference A. Furthermore, this policy will enable the Association to manage and track documents and assist in providing openness and transparency to our members and the wider public as required.

1.3 The Retention of Records Policy is required to support the organised creation, retrieval, appropriate storage and preservation of the Association's essential records. In addition, it is essential to support the appropriate disposal of documents with no continuing business, legal or historical significance.

1.4 As a Registered Charity, the actual period for records to be kept will depend on several factors, including:



- Legal Requirements.
- Storage Costs.
- The Association's need to access the document.
- Historical Value.
- Industry standards or best practice.
- Archival Needs (permanent preservation).
- Decisions by the Association's governing Council (in the absence of guidance on the above).

2. Scope of the Policy

2.1 This policy encompasses:

- Records created by or on behalf of the Association and staff in their duties for the Association.
- Records received by any member of staff of the Association.
- Hard copy and electronic records including Internet and Intranet sites, databases, emails, films and videos.

3. Data Protection

3.1 This policy will ensure that the Association is complying with applicable data protection legislation, which requires that we do not retain personal data for longer than is necessary.

3.2 To comply with the principles of data protection legislation, the Association must:

- Only keep information for as long as there is a business need.
- Keep records secure, whether electronic or paper.
- Ensure records are retrievable and easily traced.
- Allow a person access to information held about them, should they request it.

3.3 It follows that the Association must:

- Destroy papers and electronic data for which there is no continuing business need and send papers that cannot be destroyed to archive for as short a time as possible.
- Keep data secure while it remains in the possession of the Association and its staff.
- Keep track of where information is stored.
- Continue to apply these good practices to avoid stockpiling papers in the future.

4. Policy

4.1 All records created by or on behalf of the Association belong to the Association. This includes any rights or copyright in the context, except where specifically provided under copyright legislation.



4.2 All records received on behalf of the Association as part of its business will be its property, which may be disposed of or released as the Association sees fit or as required by law. Originators' and owners' rights will be fully respected in accordance with legislation.

4.3 Responsibility for depositing and disposing of archive records lies with the Association Council as the information asset owner and the appointed Council member responsible for the specific activity as the information asset manager. It is their collective responsibility to ensure that complete and accurate records are retained in line with legislative requirements and agreed best practice.

4.4 Responsibility for managing and tracking records lies with the relevant Council member who:

- Will determine if a file is no longer required for current business usage, which can then be added to the archive.
- May choose to retain records for longer than the indicative periods given in the retention schedule, for example, if they consider records to be of significant historical value or if the issue they are concerned remains 'live'.

5. **Record Keeping**

5.1 Electronic records shall be stored 'in the cloud' via the Associations' Google Workspace account in either an appropriate user area, or shared area controlled by the Secretary.

5.2 Paper or other physical records shall have an associated electronic record created for them which will capture the particular details of the record specifically:

- A meaningful title of the record.
- A brief description of what information the record contains.
- The date the record was created.
- Its physical location.

5.3 Electronic records should conform to the following naming convention in order to aid subsequent search and retrieval:

Date - Name

YYYYMMDD-Meaningful_Title

Example:

20210223-UKPSA_Data_Retention_Policy

Note: it is important to specify the date as shown and to use underscores instead of spaces to efficiently comply with the characteristics of digital file structures.

5.4 Records will be reviewed against the record retention schedule on an annual basis.



5.5 Records that have passed their retention period and have no current ad-hoc requirement to retain the information (eg, current or pending legal action or complaint) will be presented by their information asset manager for confirmation that disposal should be undertaken.

5.6 A record will be maintained documenting, as a minimum, the record type, name of the record, any further metadata that will enable subsequent identification of the record being disposed (eg, date range); date of disposal, authorising officer name and role.

5.7 The decision of the information asset manager will be countersigned by the Association Secretary on behalf of Council as the information asset owner.

6. Secure Disposal

6.1 All deleted records will be disposed of in a secure manner.

6.1.1 In the case of paper records, these will be cross-cut shredded with all waste disposed of in accordance with local authority requirements for handling such waste.

6.1.2 All electronic records are to be securely deleted from all media upon which they have been stored. The use of appropriate software applications or physical destruction is expected to achieve this for all physical media.



RETENTION SCHEDULE

Scope of Information	Example of Information	Retention Period	Data Manager (title or title equivalent)
Decision Making, Positions of Responsibility, Policies, Processes and Procedures.	Structures Annual Reports Policy Documents Superseded Policy Documents	Permanently – these records provide evidence of the development of the Association and are subject to Charity Commission and other regulatory requirements, and may provide evidence to support future regulation and policy development.	Secretary
Supporter/Donor Personal Information	Donations Legacies	Our business need will determine the length of time for which personal information will be retained. Information connected to donations will be retained until ten full financial years have elapsed since a donors' last gift OR two full financial years have elapsed from our notification of their death. Thereafter all data relating to the data subject will be deleted as part of an annual data hygiene programme. Exceptions: The name and address of people who ask not to be mailed	Treasurer



		<p>will be kept for as long as necessary to ensure that they are not mailed again.</p> <p>The records of Donors who have expressed an interest in leaving a gift in their Will to the Association will be retained until they expressly state that they will not be leaving such a gift or until four full financial years have elapsed from our notification of their death. This will enable us to identify the correlation between expressions of interest and subsequent actions.</p> <p>Information required for the purpose of legacy administration will be retained until two full financial years have elapsed since the full Legacy gift has been received.</p>	
Grants Casework and Beneficiary	Club / Match grants	<p>Holdings reviewed at the two-year point.</p> <p>Information connected to beneficiaries will be retained for a maximum of seven years after the end of service delivery relationship plus the current financial years.</p>	Treasurer



Financial Information – including: records of banking transactions, tax records, audits.		Retention period ranges from between six years to ten years from the end of the Financial Year in which the transaction was made, in line with regulations.	Treasurer
Gift Aid records		Retention of record for six years	Treasurer
Details of Injuries or Accident Reports/Records		Six years from time of accident occurring.	Secretary
Application Information for Unsuccessful Applicants: Application Forms,		Seven months after unsuccessful applicant notified of outcome – Equality Act 1980	Membership Secretary
Membership records, Development /training records		Six years after membership has ceased	Membership Secretary



Expenses		Seven years – Taxes Management Act	Treasurer
Insurance policies, claims and correspondence		Three years after lapse or after settlement	Treasurer
Accident Reports and Correspondence		Three years after settlement	Secretary
Council minutes, minutes of general meetings and other resolutions		Minimum 10 years from the date of the meeting or from the date of passing a resolution.	Secretary
Annual accounts and annual review		Permanently	Treasurer
Health and safety records		Three years for general records (and permanently for records relating to hazardous materials)	Secretary
Contracts with customers and suppliers		6 years after expiry of termination of the contract	Treasurer



Property deeds		Permanent – Limitations Act 1980	Secretary
Leases		12 years after the lease and liabilities under the lease have been terminated – Limitations Act 1980	Secretary
Email		2 years unless there is a continuing business need to retain the information beyond this point	All Council
User Accounts		Archive 4 weeks after entitlement ends Delete and transfer data (if appropriate) 6 months after entitlement ends	

