

Esports Wales

Data Retention & Disposal Policy

Status: Board-approved policy

Applies to: Directors, Staff, Volunteers, Coaches, Officials, Members, Partners

Owner: Board of Directors

Data Protection Lead: Board-appointed Director / Senior Officer

Safeguarding Lead: Designated Safeguarding Lead (DSL)

Review cycle: Annual

Next review due: 12 months from adoption

1. Purpose

This policy sets out how **Esports Wales CIC** (“the Company”) **retains, reviews, and securely disposes of records and personal data**, ensuring compliance with **UK GDPR**, safeguarding duties, and governance requirements.

It exists to:

- ensure data is kept **only as long as necessary**
 - protect personal and sensitive information
 - support safeguarding, disciplinary, and legal processes
 - reduce risk associated with unnecessary data retention
 - provide clarity and consistency across the organisation
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2. Scope

This policy applies to:

- all records and personal data held by Esports Wales

Policy Number: P0803
Version Number: 001



Esports Wales CIC:
12372413

- digital, paper, and online systems

It covers records relating to:

- players, participants, and parents/carers
 - staff, volunteers, coaches, and officials
 - safeguarding, complaints, disciplinary, and appeals matters
 - governance, finance, and operational activity
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3. Principles of Data Retention

Esports Wales is guided by the following principles:

- **Necessity** – data is retained only where there is a clear purpose
 - **Proportionality** – retention reflects the sensitivity of the data
 - **Security** – data is protected throughout its lifecycle
 - **Compliance** – retention meets legal and regulatory requirements
 - **Accountability** – decisions are documented and justifiable
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4. Retention Periods

4.1 Retention periods are based on:

- legal or statutory requirements
- safeguarding guidance
- operational or governance needs

4.2 Where a specific retention period is not prescribed by law:

- Esports Wales will retain data for **no longer than necessary**



- justification for extended retention must be documented

4.3 A **Retention Schedule** will be maintained and reviewed periodically.

5. Safeguarding Records

5.1 Safeguarding records require **extended and careful retention**.

5.2 Safeguarding records:

- must be kept **separate** from general files
- must be accessible only to authorised individuals
- may need to be retained for extended periods

5.3 Safeguarding records **must not be destroyed** where:

- an investigation is ongoing
- future risk to individuals remains
- legal proceedings are anticipated or underway

(See **0209 Record Keeping & Information Sharing Procedure**)

6. Disciplinary, Complaints & Appeals Records

6.1 Records relating to:

- disciplinary action
- complaints
- appeals

must be retained:

- for as long as necessary to evidence fair process



- in line with governance and legal requirements

6.2 Such records must not be destroyed where:

- further action is pending
 - appeal windows remain open
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7. Governance & Operational Records

7.1 Governance records (e.g. minutes, decisions, registers):

- must be retained in line with **0117 Records Management & Minute-Taking Policy**

7.2 Operational records will be retained according to:

- organisational need
 - accountability and audit requirements
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8. Secure Storage

8.1 All retained data must be:

- stored securely
- protected from unauthorised access
- accessible only to those with legitimate need

8.2 Sensitive data must not be:

- stored on personal devices
 - shared via unsecured systems
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9. Secure Disposal

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9.1 When data reaches the end of its retention period, it must be:

- securely destroyed
- disposed of in a confidential manner

9.2 Methods of disposal include:

- secure digital deletion
 - shredding of physical records
 - certified disposal services (where appropriate)
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10. Suspension of Disposal

10.1 Data disposal must be **suspended** where:

- an investigation, complaint, appeal, or safeguarding process is ongoing
 - legal proceedings are anticipated
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11. Roles & Responsibilities

11.1 Board of Directors

- holds ultimate accountability for data retention and disposal

11.2 Data Protection Lead

- oversees compliance with this policy
- maintains the retention schedule
- advises on complex retention decisions

11.3 Safeguarding Lead

- oversees safeguarding record retention



- ensures safeguarding data is protected appropriately

11.4 Staff & Volunteers

- must follow retention and disposal requirements
 - must not destroy records without authorisation
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12. Training & Awareness

Esports Wales will:

- provide guidance on retention and disposal
 - ensure those handling records understand their responsibilities
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13. Breach of This Policy

Failure to comply with this policy may result in:

- corrective action
 - restriction of access to systems
 - disciplinary or governance action
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14. Linked Policies & Procedures

This policy must be read alongside:

- **0801 Data Protection (UK GDPR) Policy**
- **0802 Privacy Policy**
- **0117 Records Management & Minute-Taking Policy**
- **0209 Record Keeping & Information Sharing Procedure**



- **0701–0706 Disciplinary, Complaints & Appeals Policies**
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15. Review


This policy shall be reviewed:

- annually
 - following data protection or safeguarding incidents
 - following changes in legal or regulatory guidance
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16. Adoption

This Data Retention & Disposal Policy was approved by the Board of Directors of **Esports Wales CIC**.

Date approved: ___02/03/2026___

Signed (Chair):___  ___

