# Data Retention Policy (EXAMPLE)

This data retention policy is to be used as an example of what can be repsented locally. It takes into account The Scout Asscoations retention policy and local Scout Group, District or County/Area/Region (Scotland) (referred to collectively as Scout Units) activities to form a document that can be tailored and consumed locally.

## By using the below example you should be able to construct your own retention policy specific to your local Scout Unit. You will be required to add information specific to your local circumstances as well as removing some of the information which is not relevant to your Scout Unit. This can act as a baseline and be expanded to include areas where you wish to retain data for other purposes, such as marketing and Scout based news.

The policy is segregated into the different types of data subjects you may be the date controller for. Each section then specifies the data processes used for each of the data sets. Somebody should be responsible for the document, and it should be regularly reviewed.

## Young people

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| --- | --- | --- | --- |
| Data Process | Data Type | Retention | Justification |
| Pre join enquiries | Personal data | 1 Year after enquiry or until young person joins, whichever is shorter | Required for placing individual on a waiting list for a place |
| Joining | Personal and Sensitive data (special category) | 2 Years after the young person leaves | Required for enquiries on membership |
| Events | Personal and Sensitive data (special category) | 2 months after event | Required for enquiries on the event and responding to incidents |
| Safeguarding | NA – See TSA Safeguarding policy | NA – See TSA Safeguarding policy | NA – See TSA Safeguarding policy |
| Incident – No medical intervention | Personal and Sensitive data | Until the young person is 21 or 3 years, whichever is greater | Legal claims raised against the incident |
| Training records | Personal data | 2 Years after the young person leaves | Required for any re-joins to connect them back to their training records |
| Attendance register | Personal data | 18 months | Required to complete annual registration review  Required to prove attendance for Gift Aid reclaimation |
| HQ Youth award registrations | Personal and Sensitive data (special category including citation) | 6 months after the award completion | To retain their award registrations for the duration of the eligibility period |
| HQ Youth award completions | Personal data and Sensitive data (special category including citation) | 6 months after the award completion  HQ will retain the data permanently for basic data; name, county, award, membership number,completion date | To retain their award registrations for the duration of the eligibility period  Historic record of award completions |

## Adult volunteers

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| --- | --- | --- | --- |
| Data Process | Data Type | Retention | Justification |
| Pre join enquiries | Personal data | 1 Year after enquiry or until adult volunteer joins | Required for placing individual on a waiting list for a place |
| Joining | Personal and Sensitive data (special category) | 2 Years after the adult volunteer leaves | Required for enquiries on membership |
| Adult Information Form | Personal and Sensitive data (special category) | 12 months or until approval checks and “Getting started” training is complete, whichever is shortest | Required to assist in the appointment process |
| Identity Checking Form | Personal data | Until ID data has been submitted to DBS/PVG and the vetting process is complete | Required to verify that the identity has been checked. |
| Events | Personal and Sensitive data (special category) | 2 months after event | Required for enquiries on the event and responding to incidents |
| Safeguarding | NA – See TSA Safeguarding policy | NA – See TSA Safeguarding policy | NA – See TSA Safeguarding policy |
| Incident – No medical intervention | Personal and Sensitive data | Until the adult volunteer is 21 or 3 years, whichever is greater | Legal claims raised against the incident |
| Training records | Personal data | 2 Years after the young person leaves | Required for any re-joins to connect them back to their training records |
| Appointments Advisory Committee notes | Personal data | 18 months | Required to review any training needs of adult volunteers |
| Adult award registrations | Personal and Sensitive data (special category including citation) | 6 months after the award completion | To retain their award registrations for the duration of the eligibility period |
| Adult award completions | Personal data and Sensitive data (special category including citation) | 6 months after the award completion  HQ will retain the data permanently for basic data; name, county, award, membership number,completion date | To retain their award registrations for the duration of the eligibility period  Historic record of award completions |

## Parents

|  |  |  |  |
| --- | --- | --- | --- |
| Data Process | Data Type | Retention | Justification |
| Pre join enquiries | Personal data | 1 Year after enquiry or until young person joins | Required for placing individuals young person on a waiting list for a place |
| Joining | Personal data | 2 Years after the young person leaves | Required for enquiries on membership |
| One off events | Personal data | 2 months after event | Required for enquiries on the event and responding to incidents |
| Safeguarding | NA – See TSA Safeguarding policy | NA – See TSA Safeguarding policy | NA – See TSA Safeguarding policy |
| Incident – No medical intervention | Personal data | Until the young person is 21 or 3 years, whichever is greater | Legal claims raised against the incident |

## Donors

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| Data Process | Data Type | Retention | Justification |
| Individual Givers | Personal Data | 1 Year | To keep you informed of your donation |
| Gift aid declaration | 6 Years after donation | HMRC Tax Audit |
| Direct debit mandate | 6 Years after last Direct Debit | As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI |

## Customers

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| --- | --- | --- | --- |
| Data Category | Data Type | Retention | Justification |
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|  |  |  |
| Adventure Centres | Personal data | 1 Year | Required for enquiries on purchases and account |
| Transaction data | 6 Years after purchase | HMRC Tax Audit or warranty period |

## Staff

|  |  |  |  |
| --- | --- | --- | --- |
| Data Process | Data Type | Retention | Justification |
| Income tax and NI records | Personal data | 3 years from the end of financial year to which they relate | The Income Tax (Employments) Regulations 1993 (SI 1993/744) as amended, for example by The Income Tax (Employments) (Amendment No. 6) Regulations 1996 (SI 1996/2631) |
| Payroll wage/salary records (also overtime, bonuses, expenses) | Personal data | 6 years from the end of the tax year to which they relate | Taxes Management Act 1970 |
| Retirement Benefits Schemes – records of notifiable events, for example, relating to incapacity | Personal data | 6 years from the end of the scheme year in which the event took place | The Retirement Benefits Schemes (Information Powers) Regulations 1995 (SI 1995/3103) |
| Statutory Maternity Pay records, calculations, certificates (Mat B1s) or other medical evidence | Personal data | 3 years after the end of the tax year in which the maternity period ends | The Statutory Maternity Pay (General) Regulations 1986 (SI 1986/1960) as amended |
| Working time records | Personal data | 2 years from date on which they were made | The Working Time Regulations 1998 (SI 1998/1833) |
| Recruitment  records | Personal data | 6 months after the candidate has not been successful | To defend against tribunals or county or high court claim |
| Personnel files and training records (including formal disciplinary records and working time records) | Personal data | 6 years after employment ceases | To assist in any formal grievance procedure |

As a Subject Rights Request (SRR) can be made by any type of individual it is represented here. Data from an SRR will be retained for 7 years to allow for answers to queries and complaints raised in relation to the SRR.

**Notes:**

Where possible, personal and sensitive (special category) data should be anonymised as soon as appropriate if they are to be retained for analysis or statistical purposes.

The retention of safeguarding data is handled by The Scout Association as part of the safeguarding policies and no data should be retained locally. This should be in line with The Scout Association ‘Young People First’, ‘Yellow Card’ <https://members.scouts.org.uk/documents/supportandresources/Safeguarding/CP%20Procedures%20Final%20Elec.pdf>.

Any incidents that have required medical intervention should be reported to The Scout Association for alignment to an incident category and to manage the process.