

Data Retention Policy (EXAMPLE)

This data retention policy is to be used as an example of what can be represented locally. It takes into account the Scouts retention policy and local Scout Group, District or County/Area/Region (Scotland) activities to form a document that can be tailored and used by local Scouting.

By using the below example you should be able to construct your own retention policy specific to your local Scout Group, District or County/Area/Region (Scotland). 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 Group, District or County/Area/Region (Scotland). 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 data controller for. Each section then specifies the data processes used for each of the data sets.

Young people

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 reclamation
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Adult volunteers

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

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

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

Data Category	Data Type	Retention	Justification
Scout Shop Merchandise	Personal data	1 Year	Required for enquiries on purchases and account
	Transaction data	6 Years after purchase or duration of warranty period, whichever is longest	HMRC Tax Audit or warranty period
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
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Notes:

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

The retention of safeguarding data is handled by the Scouts UK headquarters as part of the safeguarding procedures and no data should be retained locally. This should be in line with the Scouts ‘Young People First’; [District Commissioner Procedures](#).

Any incidents that have required medical intervention should be reported to the Scouts Information Centre for alignment to an incident category and to manage the process.