

Version 2.5 October 2018

Data Retention Policy

Purpose

This is the Data Retention Policy of The Scout Association, by which we mean, the Association is the national charity (306101) and its subsidiary companies. This includes all operations (e.g. Scout Shops, Scout Adventure Centres etc.) for which the Board is directly responsible. For clarity, this policy does not include the movement data retention provision.

The purpose of this policy is to specify The Scout Association's ("TSA") guidelines for retaining different types of data and for how long.

TSA includes the subsidiaries of Scout Store, Scout Adventures, World Scout Shop, Scout Insurance Guernsey and Unity Insurance Services.

Scope

This policy covers all data in the possession or control of TSA regardless of the medium in or on which those data are held. Where statute or regulation departs from the requirements of this policy, TSA will comply with the relevant statute or regulation. This policy may be updated from time to time.

Policy

Personal data

Personal data retention is governed by current Data Protection legislation. These data must be kept accurate, up to date and retained for no longer than is necessary for the purpose for which they were obtained. Detail of retention periods can be found in Annex A – Retention periods.

Lawful purpose for processing

Where personal data is processed using the lawful basis of legitimate interest or consent, the data subject has a number of rights that they can exercise over this data, such as delete or rectify. Communications with these data subjects will need to clearly

sign post them to their ability to withdraw this consent or challenge the legitimate interest that has been assessed, this is commonly known as 'opt out'. Where appropriate the data subject should be informed every 2 years of the consent or legitimate interest being used to process their data with an option to update this preference. A formal retention period for data processing based on consent has not been defined in this policy and is assumed as permanent until the data subject exercises their rights to cease the processing activity. Examples of processing covered by this statement are subscribers to newsletters, photograph consents and marketing communications.

ANNEX A – RETENTION PERIODS

The following retention periods are analysed into the categories of data held within TSA, these are as follows:

Members' and volunteers' data

Donors' data

Event registrants' data

Insurance customers' data

Scout Store customers' data

Scout Adventure and Scout Venues' customer data

Heritage archives

Legal services

TSA staff data

The retention period is applicable at the point where the relationship has finished, for example where a member has left the organisation.

Members and volunteer's data

Data Process	Data Type	Retention	Justification
Want to Join	Personal data	1 year after enquiry or until member joins, whichever is shorter	To keep them informed of their joining status
Joining – including the role and dates of joining	Personal and Sensitive data (special category)	10 years after leaving the data will be reduced to only include name, date of birth, awards, training records, events attended, roles and permits held and any complaints in summary format. This remaining data will be retained for 100 years.	The 10-year retention of all data is required to provide tenure and service records in the event an individual wants to re-join. The 100 years retention of data is required for evidence requests from statutory agencies
Youth award registrations	Personal and Sensitive data (special category)	6 months after the member turns 25	To retain their award registrations for the duration of the eligibility period
Youth award completions	Personal data	Permanent for basic data; name, county, award completion date	Historic record of award completions

Research surveys	Personal and Sensitive data (special category)	18 months	To keep a collation of completing members and compare answers from the previous year
Vetting	Personal Data – Disclosure Certificate	6 months after issue	In line with DBS, Access NI and Disclosure Scotland Code of Practice
Safeguarding – Adult volunteer perpetrator	Personal and Sensitive data (special category)	Adult – 100 years after case closure. Will include all case notes, including those of witnesses and young person, until it is appropriate to reduce this to a detailed summary of the case. In the event that the allegation is actually disproved or is found to have been mis-recorded in the first place, the record will include a statement that the data subject has been exonerated and the data will be subject to the joining data process retention period.	Required for required for evidence requests from statutory agencies
Safeguarding – Young person - Welfare	Personal and Sensitive data (special category)	Young Person – 7 years after last communication with the Young Person or Family.	Required for evidence requests from statutory agencies
Safeguarding – Young person perpetrator	Personal and Sensitive data (special category)	Young Person – 100 years after case closure. Will include all case notes, including those of witnesses and adult volunteers, until it is appropriate to reduce this to a detailed summary of the case. In the event that the allegation is actually disproved or is found to have been mis-recorded in the first place, the record will include a statement that the data subject has been exonerated and the data will be subject	Required for evidence requests from statutory agencies

		to the joining data process retention period.	
Incident – personal injury (including sexual abuse/psychological damage)	Personal and Sensitive data (special category)	4 years after incident, or 4 years after alleged victim turns 18 if later	Fight a case – Limitation act 1980
Incident – not involving personal injury	Personal and Sensitive data (special category)	7 years after incident, or 7 years after alleged victim turns 18 if later	Fight a case – Limitation act 1980
Permit Assessments	Personal data	6 months after the permit expires	Required for permit renewals and queries

Donors data

Data Process	Data Type	Retention	Justification
Individual Givers	Personal Data	18 months post last donation	To keep an individual informed of their donation
	Gift aid declaration	6 years after the end of the year or accounting period that includes the last donation	HMRC Tax Audit
	Direct debit mandate	6 years after the end of the year or accounting period that includes the last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI
Partnerships	Personal Data	3 Years	To answer queries on the donations and maintain a record of partner donors

Event registrants

Data Process	Data Type	Retention	Justification
Ad-hoc events	Personal and Sensitive data (special category)	2 months after event	Required for enquiries on the event and responding to incidents
Annual events	Personal and Sensitive data (special category)	18 months after event for personal data, 2 months after event for sensitive data (special category)	To re-invite the guests to the same event in the following year

International events	Personal and Sensitive data (special category)	5 years after event for personal data, 2 months after event for sensitive data (special category)	To re-invite the guests to the same event at the next cycle, which are every 4 years.
Event Permits and licenses	Personal data	6 months after the permit expires	To retain a record of permits and licenses held

Insurance customers' data

Data Process	Data Type	Retention	Justification
Non-liability cover	Personal and Sensitive data (special category)	7 Years after case closure	Advisory stipulations of the regulator(s), currently the Financial Conduct Authority
Liability cover	Personal and Sensitive data (special category)	10 Years after case closure	Advisory stipulations of the regulator(s), currently the Financial Conduct Authority
Prospect customers - enquiries	Personal data	18 months after enquiry	To keep in communication with the enquirer

Scout Store customers' data

Data Process	Data Type	Retention	Justification
Scout Store purchase	Personal data	1 Year after account closure	Required for enquiries on purchases and account
	Transaction data	6 Years after the end of the tax year for that purchase or duration of warranty period, whichever is longest	HMRC Tax Audit or warranty period
Prospect customers - enquiries	Personal data	18 months after enquiry	To keep in communication with the enquirer

Scout Adventure and Scout Venues customer data

Data Process	Data Type	Retention	Justification
Scout Adventure or Scout Venue attendee	Personal data	18 months after last booking	Required for enquiries on purchases
	Transaction data	6 Years after the end of the tax year for that purchase	HMRC Tax Audit
Prospect customers - enquiries	Personal data	18 months after enquiry	To keep in communication with the enquirer

Heritage archives

Data Process	Data Type	Retention	Justification
Heritage Collection (includes business archive)	Personal data	Permanent	Required for historical, research and statistical purposes
Donor (entry and accession) records/registers	Personal data	Permanent	Required for historical, research and statistical purposes
Information gathered as a result of an enquiry	Personal data	2 years after enquiry is complete	Required to check for repeat enquiries
Object Exit Files and register	Personal data	Permanent	Required for historical, research and statistical purposes
Day books/Index Cards	Personal data	Permanent	Required for historical, research and statistical purposes
Loan In and Out files	Personal data	Permanent	Required for historical, research and statistical purposes

Legal services

Data Process	Data Type	Retention	Justification
Estate deeds	Personal data	Permanent	Required for proof of ownership
Estate claims against deeds	Personal data	12 years from the breach of obligation	Fight a case – Limitation act 1980
Various litigation actions, to include: Simple claims in contract, tort, fraud or negligence	Personal and Sensitive data (special category)	6 years from the date of report	Fight a case – Limitation act 1980

Litigation action: defamation	Personal and Sensitive data (special category)	1 year from the publication of defamatory act	Fight a case – Limitation act 1980
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TSA staff data

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)

Personnel records, including training	Personal and Sensitive data (special category)	6 years after the employee has left	To defend against tribunals or county or high court claim
Recruitment records	Personal data	6 months after the candidate has not been successful	To defend against tribunals or county or high court claim
Emails and personal data volumes	Personal and Sensitive data (special category)	6 months after the employee has left	To answer queries that are contained in these data sources