

Data Retention Policy

Date: Approved by 5th Haywards Heath (St Paul's) Trust Board 1st October 2024

Review Date: October 2025

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. The Trustee Board is responsible for the policy and reviews it regularly.

This local policy should be read in conjunction with The Scout Association Policy at <https://www.scouts.org.uk/about-us/policy/data-retention-policy/> which includes information about, for example, some basic adult volunteer information which is kept for 100 years by TSA, but not by the local Group.

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)	10 Years after the young person leaves	Required for enquiries on membership and to respond to enquires from HQ or statutory agencies regarding incidents
Events	Personal and Sensitive data (special category)	2 years 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	7 years after incident, or 7 years after individual turns 18 if later	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

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

Data Process	Data Type	Retention	Justification
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 years 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	7 years after incident, or 7 years after individual turns 18 if later	Legal claims raised against the incident

Training records	Personal data	2 Years after the adult volunteer 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 years 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	7 years after incident, or 7 years after individual turns 18 if later	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

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.