

## 3rd Osterley Sea Scout Group Data Retention Policy

### Purpose

This is the Data Retention Policy of 3<sup>rd</sup> Osterley Sea Scout Group, registered charity 303744. The purpose of this policy is to specify our guidelines for retaining different types of data and for how long.

### Scope

This policy covers all data in the possession or control of 3<sup>rd</sup> Osterley Sea Scout Group regardless of the medium in or on which that data are held. Where statute or regulation departs from the requirements of this policy, we 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 it was obtained. Detail of retention periods can be found below.

### 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'. 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.

## Young people

Data Process	Data Type	Retention	Justification
<b>Pre join enquiries</b>	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
<b>Joining</b>	Personal and Sensitive data (special category)	2 Years after the young person leaves	Required for enquiries on membership
<b>Events</b>	Personal and Sensitive data (special category)	2 months after event	Required for enquiries on the event and responding to incidents
<b>Safeguarding</b>	NA – See the Scout Association	NA – See the Scout Association Safeguarding policy	NA – See the Scout Association Safeguarding policy

	Safeguarding policy		
<b>Incident – No medical intervention</b>	Personal and Sensitive data	Until the young person is 21 or 3 years, whichever is greater	Legal claims raised against the incident
<b>Training records</b>	Personal data	2 Years after the young person leaves	Required for any re-joins to connect them back to their training records
<b>Attendance register</b>	Personal data	18 months	Required to complete annual registration review  Required to prove attendance for Gift Aid reclamation

## Adult volunteers

Data Process	Data Type	Retention	Justification
<b>Pre join enquiries</b>	Personal data	1 Year after enquiry or until adult volunteer joins	Required for placing individual on a waiting list for a place
<b>Joining</b>	Personal and Sensitive data (special category)	2 Years after the adult volunteer leaves	Required for enquiries on membership
<b>Adult Information Form</b>	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
<b>Identity Checking Form</b>	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.
<b>Events</b>	Personal and Sensitive data (special category)	2 months after event	Required for enquiries on the event and responding to incidents
<b>Safeguarding</b>	NA – See the Scout Association Safeguarding policy	NA – See the Scout Association Safeguarding policy	NA – See the Scout Association Safeguarding policy

<b>Incident – No medical intervention</b>	Personal and Sensitive data	Until the adult volunteer is 21 or 3 years, whichever is greater	Legal claims raised against the incident
<b>Training records</b>	Personal data	2 Years after the young person leaves	Required for any re-joins to connect them back to their training records
<b>Appointments Advisory Committee notes</b>	Personal data	18 months	Required to review any training needs of adult volunteers

## Parents

Data Process	Data Type	Retention	Justification
<b>Pre join enquiries</b>	Personal data	1 Year after enquiry or until young person joins	Required for placing individuals young person on a waiting list for a place
<b>Joining</b>	Personal data	2 Years after the young person leaves	Required for enquiries on membership
<b>One off events</b>	Personal data	2 months after event	Required for enquiries on the event and responding to incidents
<b>Safeguarding</b>	NA – See the Scout Association Safeguarding policy	NA – See the Scout Association Safeguarding policy	NA – See the Scout Association Safeguarding policy
<b>Incident – No medical intervention</b>	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
<b>Individual Givers</b>	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
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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

<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 Scouts Information Centre for alignment to an incident category and to manage the process.

Version 1 – Agreed the 3rd Osterley Sea Scout Executive Committee on Tuesday 3rd November 2020, next review date 2nd November 2021.