

Version 1.0 April 2019

Data Retention Policy

Purpose

This is the Data Retention Policy of Dorset County Scout Council (DCSC).

The purpose of this policy is to specify DCSC guidelines for retaining different types of data and for how long.

Scope

This policy covers all data in the possession or control of DCSC regardless of the medium in or on which those data are held. Where statute or regulation departs from the requirements of this policy, DCSC 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 categories of data held within DCSC, these are as follows:

Members’ and volunteers’ data

Donors’ data

Event registrants’ data

Insurance customers’ data

Heritage archives

Legal services

DCSC 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
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 the 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 the 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 licences 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

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 the enquiry is complete	Required to check for repeat enquiries

Legal services

Data Process	Data Type	Retention	Justification
Estate deeds	Personal data	Permanent	Required for proof of ownership

DCSC 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,	Personal data	6 years from the end of the scheme year	The Retirement Benefits Schemes (Information

for example relating to incapacity		in which the event took place	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 the 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