



Data Retention policy

PURPOSE

Description of this data retention policy

This is the data retention policy of 3rd Itchen, by which we mean, the group as the national charity (1063370).

From this point on 3rd Itchen may be referred to as “we” or “our”.

The purpose of this policy is to specify our guidelines for retaining different types of personal data and for how long. For clarity, this policy does not include the movement data retention provision.

Scope

This policy covers all data in the possession or control of the group regardless of the medium in or on which data are held or were collected. 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.

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.

Where a person has requested that we delete all data we hold about them, we may need to retain basic personal data to evidence that we have completed the request.

LAWFUL PURPOSE FOR PROCESSING

Personal data can only be processed (including how it is retained) where there is a lawful basis.

We rely on different lawful bases depending on what the personal data is being used for. In some cases, we have a legal need or right to keep the data, but in other cases we rely on data subjects consenting or out legitimate interests, where this needs to be actively managed.

Data subjects also have a number of rights that they can exercise over their personal data, such as to delete or rectify it.

MAINTAINING CONSENT

We need to communicate with these data subjects to clearly sign post them to their ability to withdraw their consent or challenge the legitimate interest that has been assessed, this is commonly known as “opt out”. Where appropriate the data subjects 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 dat 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 precessing covered in this statement include, but are not limited to, subscribers to newsletters, photograph consents and marketing communications.

RETENTION PERIODS

The following retention periods are analysed into the categories we hold within the group, these are as follows:

- Members’ and volunteers’ data
- Donors’ data
- Event registrants’ and participants’ data
- Insurance customers’ data
- Complaints data

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

The same piece of data may be held by different teams and for different purposes. It will therefore be covered by the retention policy for each purpose, and so retained by the organisation for the longer of the stated periods.

MEMBERS AND VOLUNTEER’S DATA

Data process	Data type	Retention period	Justification
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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, dates of joining and permits	Personal and sensitive (special category) data	10 years after leaving the data will be reduced to only include name, membership number, date of birth, awards, training records, events attended, roles, permits held and any complaint in summary. 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 or internal safeguarding investigations
Youth award registrations	Personal and sensitive (special category including citation) data	6 months after the member turns 25.	To retain their award registrations for the duration of the eligibility period.
Adult award registrations	Personal and Sensitive data (special category including citation)	6 months after the registration.	To retain their award registrations for the duration of the eligibility period.
Research surveys	Personal and sensitive (special category) data	18 months.	To keep a collation of completing members and compare answers from the previous year.
Incident – personal injury details (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.

DONORS' DATA

Data process	Data type	Retention period	Justification
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Individual givers	Personal Data	5 years post last donation or last positive interaction with Group Fundraising Team, whichever is longer.	To keep an individual informed of their donation and other fundraising campaigns.
	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.
Major Donors	Personal Data	5 years post last donation or last positive interaction with the Group Fundraising Team, whichever is longer.	To keep an individual informed of their donation and other fundraising campaigns.

EVENT REGISTRANTS' AND PARTICIPANTS' DATA

Data process	Data type	Retention period	Justification
Ad-hoc events	Personal and Sensitive data (special category)	2 months after event. Group Young People and adult volunteer attendance records will be retained for 100 years.	Required for enquiries on the event and responding to incidents. The 100 years retention of data is required for evidence requests from statutory agencies or internal safeguarding investigations.

Annual events	Personal and Sensitive data (special category)	18 months after event for personal data, 2 months after event for sensitive data (special category). Group Young People and adult volunteer attendance records will be retained for 100 years.	To re-invite the guests to the same event in the following year. The 100 years retention of data is required for evidence requests from statutory agencies or internal safeguarding investigations.
International events	Personal and Sensitive data (special category)	5 years after event for personal data, 2 months after event for sensitive data (special category). Scouting Young People and adult volunteer attendance records will be retained for 100 years.	To re-invite the guests to the same event at the next cycle, which are approximately every 4 years. The 100 years retention of data is required for evidence requests from statutory agencies or internal safeguarding investigations.

INSURANCE CUSTOMERS' DATA

Data process	Data type	Retention period	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.

COMPLAINTS DATA

Data process	Data type	Retention period	Justification
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Complaints Process	Personal data / special category data	6 years from the final recorded communication from the complainant about the complaint.	Required as part of the Limitation Act 1980.
Whistleblowing Process	Personal data / special category data	6 years from the final recorded communication from the person raising the issue about the case. Where a case is raised anonymously, 6 years from the date the case is concluded.	Required as part of the Limitation Act 1980.

MANAGEMENT OF THIS POLICY

Review of this policy

This policy will be reviewed periodically as any changed in regulations or best practice occur; this will be at least every 3 years.

Approval of this policy

This policy is approved by the Group Board of Trustees, with operational oversight of the measures set out above. This policy was created by the Data Protection Officer, Lewis Drake, with guidance from The Scout Association.