

South East Scotland Scouts Data Retention Policy

This policy was last updated on 17/04/2026.

Personal Data

Personal data retention is governed by the Data Protection Act 2018 and the UK General Data Protection Regulation. 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.

South East Scotland Regional Scout Council relies on different lawful bases depending on what the personal data is being used for. In some cases, South East Scotland Regional Scout Council has a legal need or right to keep the data, but in other cases South East Scotland Regional Scout Council relies on data subjects consenting or South East Scotland Regional Scout Council's 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 or Legitimate Reasons for Retention

South East Scotland Regional Scout Council needs 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 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.

Retention Periods

The following retention periods are analysed into the categories of data held within South East Scotland Regional Scout Council, these are as follows:

- Members and volunteers' data
- Donors' data
- Event registrants' and participants data
- Customer data for Bonaly Scout Centre and Longcraig Scout Activity Centre
- Complaints, communication and customer service

Members and volunteer's data

Note: adult volunteer membership records are held by The Scout Association on behalf of South East Scotland Regional Scout Council. We remain a data controller of this 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, dates of joining and permits	Personal and sensitive data (special category)	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 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 or internal safeguarding investigations.
Youth Top Award registrations	Personal and sensitive data	6 months after the member turns 25	To retain their award registrations for the duration of

			the eligibility period.
Youth Top Award completions	Personal data and sensitive data	Permanent for basic data; name, location, award, membership number, HQ approval date and Windsor attendance status (where relevant). For KSA and Explorer Belt data: other data is deleted three years after the award competition date. For SOWA data: other data is deleted one year after the award competition date.	Historic record of award completions.
Youth MC/G/CSB/CSPA award nominations	Personal and sensitive data (special category including citation)	Successful awards: permanent Unsuccessful awards: one year after decision from HQ	To retain their award nominations, locally made decisions for the purpose of processing awards Successful awards: historic record of awards
Adult GS/MC/G/CSB/CSPA award nominations made locally	Personal and Sensitive data (special category including citation)	Successful awards: Permanent. Unsuccessful awards: One year	To retain their award nominations/locally made decisions for the purpose of processing awards.

		after decision by HQ.	Successful awards: Historic record of awards.
Department for Digital, Culture, Media & Sport (DCMS) Award nomination at local Scout Group, District or at Regional level	Personal data and Sensitive data (special category including citation)	Where TSA are approached by a local group in relation to a possible national honour nomination, TSA will retain the information for two years from the initial contact. Where TSA are informed that the local group have made a submission to DCMS, TSA will retain the information for three years from the date of submission.	To assist with progressing award nominations.
Vetting	Personal Data – Disclosure Certificate	6 months after issue. Details of any offences and alleged offences may be retained in order to support ongoing suitability risk assessments.	6 months after issue. Details of any offences and alleged offences may be retained in order to support ongoing suitability risk assessments.
Safety Incident (Adult) –including personal injury details (covering sexual	Personal and Sensitive data (special category)	20 Years after the incident.	To address a legal claim, offer support and identify trends.

abuse/psychological damage) and cases with no personal injury identified			
Safety Incident (Young Person) – including personal injury details (covering sexual abuse/psychological damage) and cases with no personal injury identified	Personal and Sensitive data (special category)	20 Years after the young person turns 18.	To address a legal claim, offer support and identify trends.

Donors' Data

Data Process	Data Type	Retention	Justification
Individual Givers	Personal Data	5 years post last donation or last positive interaction with Regional Trustee Board, whichever is longer.	To keep an individual informed of their donation and other fundraising campaigns.
	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.

Legacy Donors	Personal Data	In perpetuity.	To maintain record of the donation.
All donations – transaction information (including Gift aid declaration)	Personal Data	6 years after the end of the year or accounting period.	For audit purposes (including HMRC Tax Audit).

Event Registrants' and Participants Data

Data Process	Data Type	Retention	Justification
Ad-hoc events	Personal and Sensitive data (special category)	2 months after event. Scouting 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). Scouting 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	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

		volunteer attendance records will be retained for 100 years.	statutory agencies or internal safeguarding investigations.
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Customers of Bonaly Scout Centre and Longcraig Scout Activity Centre

Data Process	Data Type	Retention	Justification
Bonaly or Loncraig 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.

Complaints, Communication and Customer Service

Data Process	Data Type	Retention	Justification
Complaints Process	Personal and Sensitive data (special category)	6 years from the final recorded communication from the complainant about the complaint.	Required as part of the Limitation Act 1980.
Whistleblowing Process	Personal and Sensitive data (special category)	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	Required as part of the Limitation Act 1980.

		the date the case is concluded.	
Records of outbound bulk emails (including membership emails) and relevant metadata	Personal data	10 years after the sent date.	For the purpose of evidencing communication and successful delivery.
Customer Contact Information	Personal and Sensitive data (special category)	Records of contacts are retained for 5 years.	To retain accurate business records and assist with further enquiries.

Employees of South East Scotland Regional Scout Council

Data Process	Data Type	Retention	Justification
Administering the employment contract	Contact details	6 years post-employment	Required as part of the Limitation Act 1980.
Equal opportunities monitoring	Date of birth, gender, marital status, information about race, information about ethnicity, information about religious beliefs, information about sexual orientations, information about political affiliations.	6 years post-employment.	Required as part of the Limitation Act 1980.
Health and Safety	Next of kin, emergency contact details	During employment	Legitimate interest

Payroll	National insurance number, salary information, bank details, tax details	6 years post-employment	Required as part of the Limitation Act 1980.
Liasing with pension providers	Pension details, employment start and end dates	75 years post-employment	Contractual obligations
Providing benefits to staff members	Benefits information	6 years post-employment	Required as part of the Limitation Act 1980.
Making recruitment decisions	CV, driving license, qualifications, employment history	6 years post-employment	Required as part of the Limitation Act 1980.
Managing staff health and safety, ascertaining fitness to work	Information about disability	6 years post-employment	Required as part of the Limitation Act 1980.
Checking right to work in the UK	Right to work documents	6 years post-employment	Required as part of the Limitation Act 1980.
Managing absence	Sick leave details	6 years post-employment	Required as part of the Limitation Act 1980.
Managing performance	Performance details	6 years post-employment	Required as part of the Limitation Act 1980.
Education, training and development requirements	Training records, professional memberships	6 years post-employment	Required as part of the Limitation Act 1980.

Staff management	Disciplinary and grievance information	6 years post-employment	Required as part of the Limitation Act 1980.
Safety and security	Archived/saved CCTV footage	6 years post-employment	Required as part of the Limitation Act 1980.
Safety and security	CCTV footage	28 days	Legitimate interest
Ensuring network and data security	Information about use of IT systems	6 years post-employment	Required as part of the Limitation Act 1980.
Safety and security, publicity purposes	Photographs	During employment	Legitimate interest
Deducting trade union fees	Trade union membership	6 years post-employment	Required as part of the Limitation Act 1980.
Managing absence, ascertaining fitness to work	Health records	6 years post-employment	Required as part of the Limitation Act 1980.
Making decisions about recruitment or continued employment	Criminal convictions and offences	6 years post-employment	Required as part of the Limitation Act 1980.
Managing health and safety	Accident books, first aid records	3 years after the last record in the book	Required as part of the Reporting of Injuries, Diseases and Dangerous Occurrences

			Regulations 2013 (RIDDOR)
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VERSION CONTROL

Title	South East Scotland Scouts Data Retention Policy			
Description	Data retention schedule for the charity known as South East Scotland Scouts			
Created By	George Brightman			
Date Created	19/03/2025			
Maintained By	IT & Data Committee			
Version Number	Modified By	Modifications Made	Date Modified	Status
V0	N/A	Draft	Draft	Draft
V1	N/A	N/A	19/03/2025	Approved by Trustee Board in March 2025.
V2	George Brightman	Inserted updated staff data retention schedule into the end of the existing policy. No other part of the policy has been altered.	17/04/2026	Approved by Trustee Board in March 2026.