

Scouts The Malverns Data Retention Policy

September 2026

Registered Charity Number: 1030019



What is this Data Retention Policy?

This Data Retention Policy aims to specify for The Malverns District guidelines for retaining different types of data and for how long. It covers all data held by The Malverns District, including Explorers, Network, Volunteers, Parents/Guardians and uses of Warren Oak, regardless of the medium in or on which the data is held.

Where statute or regulation departs from the requirements of this policy, The Malverns District will comply with the relevant statute or regulation. This policy will be reviewed regularly.

Personal data retention is governed by current Data Protection legislation. Data must be accurate, kept up to date and retained for no longer than is necessary for the purpose for which it was obtained. Details of retention periods are set out in the tables below.

The retention periods set out in this policy cover data routinely collected and stored by The Malverns District. Any other personal data required for ad hoc purposes will be destroyed as soon as it is no longer necessary.

The policy is segregated into the different types of data subjects. Each section then specifies the data processes used for each of the data sets.

Young People

Data Process	Data Type	Retention	Justification
Pre Join Enquires	Personal Data	1 year after enquiry or until a member joins, whichever is the shorter. After 1 year review if this information is accurate and still required with the parent/guardian and still wants to stay on the waiting list if no space is available.	Required to place them on the waiting list for a place and keep them informed of progress
Joining	Personal and Sensitive Data (Special Category)	10 years after the Young Person leaves.	Required for enquiries on membership and to respond to enquiries from Headquarters or

			statutory agencies regarding incidents
Events	Personal and Sensitive Data (Special Category)	2 years after the event. (N.B any consent provided for photos and videos will be kept with the Personal data and Consent records)	Required for enquiries on the event and responding to incidents
Safeguarding	N/A – see Scout Association Safeguarding policy	N/A – see Scout Association Safeguarding policy	N/A – see Scout Association 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 (including badges)	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	2 years	Required to complete annual registration review
Headquarters Youth award registrations	Personal and Sensitive data (special category including citation)	1 year after the award completion	To retain their award registrations for the duration of the eligibility period
Headquarters Youth award completions	Personal data and Sensitive data (special category including citation)	1 year after the award completion. Headquarters 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
Photos & Video	Personal and Sensitive Data (Special Category)	Indefinite, or until the subject requests deletion	This makes up the permanent record and history of the Group. The photos may already be in the public domain and may not be able to remove.

Parents & Guardians

Data Process	Data Type	Retention	Justification
Pre Join Enquires	Personal Data	Until the Young Person is offered a place, withdraws their application, or reaches the age of 14, whichever is sooner.	Required for placing Young Person on a joining list for a place
Joining	Personal and sensitive data (special category)	2 years after the Young Person leaves.	For enquiries on membership and to assist re-joining
Events	Personal and Sensitive Data (Special Category)	2 years after event (N.B any consent provided for photos and videos will be kept with the Personal data and Consent records)	Required for enquiries on the event and responding to incidents
Safeguarding	N/A – see Scout Association Safeguarding policy	N/A – see Scout Association Safeguarding policy	N/A – see Scout Association 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
Accounting	Personal Data	6 Years from the end of the accounting period during which any transaction took place.	Required by charity reporting and accounting regulations.
Complaints	Personal and sensitive data (special category)	1 year after the complaint has been resolved/concluded	To enable the complaint to be dealt with and to allow for any follow up.
Photos & Video	Personal and Sensitive Data (Special Category)	Indefinite, or until the parent/guardian requests deletion	This makes up the permanent record and history of the Group. The photos may already be in the public domain and may not be able to remove.

Adult Volunteers

Data Process	Data Type	Retention	Justification
Pre Join Enquires	Personal Data	1 Year after enquiry or until adult volunteer joins.	To prove their enquiry and keep them informed of progress
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)	6 months after event (N.B any consent provided for photos and videos will be kept with the Personal data and Consent records)	Required for enquiries on the event and responding to incidents
Safeguarding	N/A – see Scout Association 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
Accounting	Personal Data	6 Years from the end of the accounting period during which any transaction took place.	Required by charity reporting and accounting regulations.
Training records	Personal data	2 Years after the adult volunteer leaves	Required for any re-joins to connect them back to their training records
Adult award registrations	Personal and Sensitive data	6 months after the award completion	To retain their award registrations for the

	(special category including citation)		duration of the eligibility period
Adult award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion Headquarters 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
Complaints	Personal and sensitive data (special category)	1 year after the complaint has been resolved/concluded	To enable the complaint to be dealt with and to allow for any follow up.
Insurance	Personal Data	6 Years from the end of the accounting period during which the insurance schedule was purchased	Required by charity reporting and accounting regulations.
Photos & Video	Personal and Sensitive Data (Special Category)	Indefinite, or until the adult volunteer requests deletion	This makes up the permanent record and history of the Unit. The photos may already be in the public domain and may not be able to remove.

Donors

Data Process	Data Type	Retention	Justification
Individual Givers	Personal Data	1 Year	To keep informed about donation
Individual Givers	Gift Aid Declaration	6 Years from the end of the accounting period during which any transaction took place.	HMRC Tax Audit
Individual Givers	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	6 Years from the end of the accounting period during which any transaction took place.	To answer queries on the donations and maintain a record of partner donors
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Suppliers

Data Process	Data Type	Retention	Justification
Supplier Information	Personal Data	2 Years policy applies after the warranty expires.	To be kept in case a warranty claim needs to be made
Photos & Video	Personal and Sensitive Data (Special Category)	Indefinite, or until the user requests deletion	This makes up the permanent record and history of the Unit. The photos may already be in the public domain and may not be able to remove.

Customers and Users

Data Process	Data Type	Retention	Justification
Users / hirers	Personal Data	1 years after the accounting year in which the facilities are used.	Required for enquiries on purchases and account.
Users / hirers	Transaction data	6 Years after the accounting year in which the facilities are used	HMRC Tax Audit or warranty period
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
Photos & Video	Personal and Sensitive Data (Special Category)	Indefinite, or until the user requests deletion	This makes up the permanent record and history of the Group. The photos may already be in the public domain and may not be able to remove.

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.

This Data Retention Policy was reviewed and agreed by the District Trustee Board at their meeting on the 9th September 2026 and directly follows the currently available guidance from The Scout Association.