

Royal Greenwich Scouts – Data Retention Policy (v1.1)

Approved by: District Trustee Board

Applies to: All trustees, leaders, managers, and volunteers processing personal data for RGS

Review cycle: Annual (each September)

1) Purpose & scope

This policy sets how long Royal Greenwich Scouts (RGS) keeps different types of personal data and how we securely dispose of it, in line with UK GDPR's storage-limitation principle (keep data no longer than necessary). It covers data collected directly by RGS (web forms, email, spreadsheets) and data processed via third parties we use (e.g., Eventbrite). RGS (the local District charity) is the controller for the processing listed here.

2) Legal & regulatory anchors

- UK GDPR / Data Protection Act 2018 — storage limitation & accountability
- Limitation Act 1980 — common claim windows (e.g., 6 years for contract; 3 years for personal injury; for minors' PI typically until age 21)
- Charities/finance rules — retain accounting/VAT/Gift Aid records for 6 years
- Health & safety — retain accident/incident records for at least 3 years (see schedule)

3) Roles & responsibilities

- Trustees: Accountable for this policy.
- Data Lead: Maintains the retention schedule; coordinates deletion reviews; logs exceptions.
- All volunteers: Follow this policy; use approved storage; label files with event/date; escalate rights requests.

4) Storage & general rules

- Use RGS Google workspaces or approved systems only.
- Avoid keeping personal data in personal email/drives or messaging apps beyond what's necessary; move essential info into approved systems and delete from chats.
- Prefer anonymised/aggregated stats where possible.
- When a retention period ends, delete or anonymise securely (and remove from backups where feasible).

5) Retention schedule

Data set	Typical contents	Lawful basis	Retention rule	Notes
Venue booking forms & hire agreements (confirmed bookings)	Hirer name, contacts, dates, terms, correspondence	Contract; legitimate interests	6 years after the end of the hire	Covers contract/correspondence; aligns with limitation & finance recordkeeping.
Venue enquiry forms (no booking made)	Name, contact, proposed dates	Legitimate interests	12 months from last contact	Reasonable window to convert/manage enquiries.
"Want to Join" (youth) enquiries	Parent/guardian details, young person's age/section, preferences	Legitimate interests	12 months from last contact (or until placed in local systems)	If they join, their data is then covered by group systems/policies.

Volunteer enquiries / recruitment (not appointed)	Contact details, experience, notes	Legitimate interests	12 months after decision	Retain briefly for audit/queries; longer usually excessive.
General contact forms	Name, email, message thread	Legitimate interests	6 months after the query is closed	Keep only for normal follow-up/complaints cycles.
Event sign-ups via Eventbrite – attendee list & logistics	Name, email, section, dietary/access needs, emergency details, ticket info	Contract; vital interests (on the day); legitimate interests	Core attendee list: 3 years after the event. Dietary/access/medical collected for logistics: delete within 3 months post-event unless an incident requires longer.	Minimise sensitive logistics data after the event. Ensure our event privacy note states retention.
Event finance (e.g., Eventbrite payouts, invoices, Gift Aid)	Transaction reports, invoices, banking, Gift Aid	Legal obligation	6 years from FY end	Finance/charity rules.
Accident / incident reports (adults)	Forms, witness statements, photos	Legal obligation; legitimate interests	At least 3 years from the incident	Keep longer if an investigation/claim is open.
Accident / incident reports involving children	As above	Legal obligation; legitimate interests	Until the young person's 21st birthday	Reflects typical PI limitation for minors.
Risk assessments for events/activities	RA forms, control measures	Legal obligation	3 years after the event (or last use), longer if linked to an incident	Retain longer where an incident occurred.

6) Disposal & deletion

- Delete electronic records from primary storage and shared drives; schedule deletion of Eventbrite exports and, where feasible, within Eventbrite.
- Securely destroy paper (cross-cut shred).
- Log what was deleted and when (system reports are acceptable).

7) Exceptions & holds

If a complaint, claim, investigation, subject access request or insurance matter is open or reasonably anticipated, place a legal hold and suspend deletion for relevant records until closed (then apply the standard period from the closure date). Record any exception with justification and review date.

8) Data subject rights & transparency

Our privacy notices must clearly state retention periods (or the criteria for determining them) and how individuals can exercise their rights (access, rectification, erasure, restriction, objection).

Appendix A – Quick reference

- Contracts & booking files: 6 years after hire.
- Finance/VAT/Gift Aid: 6 years from FY end.
- General queries: 6 months after closure.
- Volunteer (unsuccessful) recruitment: delete within 12 months.
- Eventbrite attendee lists: keep 3 years; dietary/access/medical delete within 3 months post-event (unless incident).
- Adult incidents: ≥3 years. Child incidents: until age 21.
- Risk assessments: 3 years after event (longer if incidents).