

## 16<sup>th</sup> Wigan Scout Group

### Data Retention Policy

Version 1 – 4<sup>th</sup> March 2026

This is the data retention policy for the 16<sup>th</sup> Wigan Scout Group, 16<sup>th</sup> WIGAN SCOUT GROUP<sup>1</sup> are a registered charity with the Charity Commission for England & Wales; charity number 504673. It describes the length of time that data is kept in our records be it electronic or papercopy or by any other means. It takes into account The Scout Associations retention policy (refer to [Data Retention Policy | Scouts](#) link).

The document will reviewed annually and updated if the need arises.

This Data Retention Policy which can be found [here](#) on the 16<sup>th</sup> Wigan Group website. The associated Data Protection Policy can also be found [here](#) on the 16<sup>th</sup> Wigan Group website.

#### Young people

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until young person joins, whichever is shorter	Required for placing individual on a waiting list for a place
Joining	Personal and Sensitive data (special category)	10 Years after the young person leaves	Required for enquiries on membership and to respond to enquires from HQ or statutory agencies regarding incidents
Events	Personal and Sensitive data (special category)	2 years after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA 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
Training records	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	18 months	Required to complete annual registration review Required to prove attendance for Gift Aid reclamation

HQ Youth award registrations	Personal and Sensitive data (special category including citation)	6 months after the award completion	To retain their award registrations for the duration of the eligibility period
HQ Youth award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion HQ 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

## Adult volunteers

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until adult volunteer joins	Required for placing individual on a waiting list for a place
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)	2 years after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA 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	Legal claims raised against the incident

		after individual turns 18 if later	
Training records	Personal data	2 Years after the adult volunteer leaves	Required for any re-joins to connect them back to their training records
Appointments Welcome Committee notes	Personal data	18 months	Required to review any training needs of adult volunteers
Adult award registrations	Personal and Sensitive data (special category including citation)	6 months after the award completion	To retain their award registrations for the duration of the eligibility period
Adult award completions	Personal data and Sensitive data (special category including citation)	6 months after the award completion  HQ 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

## Parents

Data Process	Data Type	Retention	Justification
Pre join enquiries	Personal data	1 Year after enquiry or until young person joins	Required for placing individuals young person on a waiting list for a place
Joining	Personal data	2 Years after the young person leaves	Required for enquiries on membership
One off events	Personal data	2 years after event	Required for enquiries on the event and responding to incidents
Safeguarding	NA – See TSA Safeguarding policy	NA – See TSA Safeguarding policy	NA – See TSA 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

## Donors

Data Process	Data Type	Retention	Justification
Individual Givers	Personal Data	1 Year	To keep you informed of your donation
	Gift aid declaration	6 Years after donation	HMRC Tax Audit
	Direct debit mandate	6 Years after last Direct Debit	As proof of Direct Debit Instruction (DDI) and to assist in claims against that DDI

## Customers

Data Category	Data Type	Retention	Justification
Shop on Group Website.	Personal data	1 Year	Required for enquiries on purchases and account
	Transaction data	6 Years after purchase	HMRC Tax Audit or warranty period

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. you can ask us to share with you the data we have about you. This is a Data Subject Access Request. If one wants to make such a request the following link describes the process to follow. [Subject Access Requests | Scouts](#)

### 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.

## 16<sup>th</sup> Wigan Scout Group data protection policy – Version 1 (4<sup>th</sup> March 2026)

This document is the 16<sup>th</sup> WIGAN SCOUT GROUP data protection policy,

Section Title	Example wording
<b>What is this Data Protection Policy?</b>	<p>This Data Protection Policy describes the categories of personal data 16<sup>th</sup> WIGAN SCOUT GROUP process and for what purposes. 16<sup>th</sup> WIGAN SCOUT GROUP are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.</p> <p>This Data Protection Policy applies to members, parents/guardians of youth members, volunteers, contractors, suppliers, supporters, donors and members of the public who will contact the 6<sup>th</sup> WIGAN SCOUT GROUP.</p> <p>This Data Protection Policy can be found on the 16<sup>th</sup> WIGAN SCOUT GROUP website found <a href="#">here</a>.</p>
<b>Who we are</b>	<ul style="list-style-type: none"> <li>16<sup>th</sup> WIGAN SCOUT GROUP are a registered charity with the Charity Commission for England &amp; Wales; charity number 504673.</li> </ul> <p>The Data Controller 16<sup>th</sup> WIGAN SCOUT GROUP is the Trustee Board who are appointed at an Annual General Meeting and are Charity Trustees. The Chair of the Charity Trustees is Andy Connellan.</p> <p>From this point on 16<sup>th</sup> WIGAN SCOUT GROUP will be referred to as “we”. we have access to a volunteer assuming the role of Data Lead. They can be contacted via the following email address <a href="mailto:datalead@16thwiganscouts.org.uk">datalead@16thwiganscouts.org.uk</a>.</p>
<b>The data we may process</b>	<p>The majority of the personal information we hold, is provided to us directly by you or by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership systems. The data protection policy and security notice for our youth membership system can be found here: OSM Privacy Policy (<a href="http://www.onlinescoutmanager.co.uk/privacy.html">www.onlinescoutmanager.co.uk/privacy.html</a>). In the case of adult members and volunteers, data may also be provided by third parties, such as the England &amp; Wales - Disclosure and Barring Service</p>

	<p>(DBS.</p> <p>Where a member is under the age of 18, this information will only be obtained from a parent or guardian and cannot be provided by the young person.</p> <p>We may collect the following personal information:</p> <ul style="list-style-type: none"> <li>• Personal contact details such as name, title, address, telephone numbers and personal email address - so that we can contact you.</li> <li>• Date of birth - so that we can ensure young people are allocated to the appropriate Section for their age and that adults are old enough to take on an appointment with Scouting.</li> <li>• Gender – so that we can address individuals correctly and accommodate for any specific needs.</li> <li>• Emergency contact information - so that we are able to contact someone in the event of an emergency.</li> <li>• Government identification numbers e.g. national insurance, driving licence, passport - to be able to process volunteer criminal record checks.</li> <li>• Bank account details, payroll information and tax status information - so that we are able to collect gift aid from HMRC where donations are made.<sup>8</sup></li> <li>• training records - so that members can track their progression through the Scout programme or adult training scheme.</li> <li>• Race or ethnic origin - so that we can make suitable arrangements based on members cultural needs.</li> <li>• Health records - so that we can make suitable arrangements based on members medical needs.</li> <li>• Criminal records checks - to ensure Scouting is a safe space for young people and adults.</li> </ul>
<p><b>The lawful basis we process your data by</b></p>	<p>We comply with our obligations under the GDPR and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.</p>

In most cases the lawful basis for processing will be through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members. Sensitive (special category) data for both adult volunteers and our youth members will mostly align with the lawful basis of legitimate activities of an association. Explicit consent is requested from parents/guardians to take photographs of our members, where such photographs place the data subject as the focal point of the shot. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large-scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

We use personal data for the following purposes:

- to provide information about Scout meetings, activities, training courses and events to our members and other volunteers in 16<sup>th</sup> WIGAN SCOUT GROUP
- to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution
- to administer membership records
- to fundraise and promote the interests of Scouting
- to manage our volunteers
- to maintain our own accounts and records (including the processing of gift aid applications)
- to inform you of news, events, activities and services being run or attended by the 16<sup>th</sup> WIGAN SCOUT GROUP
- to ensure and evidence your suitability if volunteering for a role in Scouting
- to contact your next of kin in the event of an emergency
- to ensure you have and maintain the correct qualifications and skills.

We use personal sensitive (special) data for the following purposes:

- for the protection of a person's health and safety whilst in the care of the 16<sup>th</sup> WIGAN SCOUT GROUP
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting.

<p><b>Our retention periods</b></p>	<p>We will keep certain types of information for different periods of time in line with our Data Retention Policy which can be found <a href="#">here</a> on the 16<sup>th</sup> WIGAN SCOUT GROUP website.</p> <p>The Scout Association’s Data Protection Policy can be found <a href="#">here</a> and the Data Retention Policy can be found <a href="#">here</a></p>
<p><b>Joint control of membership data</b></p>	<p>The Scout Association and the 16<sup>th</sup> WIGAN SCOUT GROUP process the data of members, parents/guardians of youth members, and volunteers on our membership databases. Volunteer data is processed between the local Scout Groups and The Scout Association. Information The Scout Association and the 16<sup>th</sup> WIGAN SCOUT GROUP hold about volunteers may include the following: (members, parents/guardians of youth members data are only held by the 16<sup>th</sup> WIGAN SCOUT GROUP)</p> <ul style="list-style-type: none"> <li>• name and contact details</li> <li>• length and periods of membership and volunteer service (and absence from membership and volunteer service)</li> <li>• details of training received</li> <li>• details of experience, qualifications, occupation, skills and awards received</li> <li>• details of Scouting events and activities members have taken part in</li> <li>• details of next of kin</li> <li>• age/date of birth</li> <li>• legal sex</li> <li>• details of any health conditions</li> <li>• details of disclosure checks</li> <li>• any complaints we have received about the member</li> <li>• details of any safeguarding concerns raised about or by the member</li> <li>• details about role(s) in Scouting</li> <li>• details about membership status</li> <li>• diversity and inclusion data (including nationality, ethnicity, religion / belief, health information, gender, and sexual orientation)</li> </ul>

Processing Activities		
<p>The following is a list of common data processing activities for members, parents/guardians of youth members, volunteers' data on the membership systems. This includes an indication of which entity carries out this activity which is shared with the other.</p>		
Processing Activity	Description	Processing entity
Scout Member capture	Initial data load of a new Scout Member onto the membership database	16 <sup>th</sup> WIGAN SCOUT GROUP
Scout Member disclosure check	Disclosure checks for any adult Scout Members that require them	16 <sup>th</sup> WIGAN SCOUT GROUP initiate The Scout Association complete the check
Scout Member operational administration	This may include: Scout Member data updates Maintaining training record Events attended Permits approved Badges awarded	16 <sup>th</sup> WIGAN SCOUT GROUP and The Scout Association
Scout Member disciplinary	Scout Member disciplinary detail capturing where a Scout Member has breached POR or any other Scout policy	16 <sup>th</sup> WIGAN SCOUT GROUP initiate The Scout Association involved if severity meets a policy threshold

	Scout Member leaving	The updating of an individual's membership status post leaving the association.	16 <sup>th</sup> WIGAN SCOUT GROUP
	Scout Member data reporting	Reporting on trends and monitoring data to be able to demonstrate The Scouts impact and to attract funding (this may include optional special category data of the Scout Members)	The Scout Association  16 <sup>th</sup> WIGAN SCOUT GROUP may access special category data for Census and local Scouting delivery
	Scout Member Training	The addition of mandatory training for Scout Members, where applicable	The Scout Association
	Scout Member roles definition	The definition of Scout Member roles on the membership databases	The Scout Association
<b>Sharing your information</b>	<p><b>Young people and other data subjects</b> We will normally only share personal information with adult volunteers holding an appointment in the 16<sup>th</sup> WIGAN SCOUT GROUP</p> <p><b>Adult volunteers</b> We will normally only share personal information with adult volunteers holding appropriate appointments within the line management structure of The Scout Association for the 16<sup>th</sup> WIGAN SCOUT GROUP as well as with The Scout Association Headquarters as independent data controllers.</p> <p><b>All data subjects</b> We will however share your personal information with others outside of the 16<sup>th</sup> WIGAN SCOUT GROUP where we need meet a legal obligation. This may include The Scout Association and its insurance subsidiary</p>		

	<p>(Unity Insurance Services), local authority services and law enforcement. We will only share your personal information to the extent needed for those purposes.</p> <p>We will only share your data with third parties outside of the organisation where there is a legitimate reason to do so.</p> <p>We will never sell your personal information to any third party.</p> <p>Sometimes we may nominate a member for national awards, (such as Scouting awards or Duke of Edinburgh awards) such nominations may require us to provide contact details and award nomination details, such as citations to that organisation. We may also share data on award nominees for National Honours Awards, including the same data as above.</p> <p>Where personal data is shared with third parties, we will seek assurances that your personal data will be kept confidential and that the third party fully complies with the GDPR and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.</p>
<p><b>How we store your personal data</b></p>	<p>We generally store personal information in the following ways:</p> <p><b>The Scout Association Online Membership System</b> - this is used for the collection and storage of adult volunteer personal data.</p> <p><b>Online Scout Manager</b> - is the online membership system of Online Youth Manager, this system is used for the collection and storage of youth member personal data.</p> <p>In addition, adult volunteers may hold some personal data on local spreadsheets/databases.</p> <p>Printed records and data held while attending events - paper is sometimes used to capture and retain some data for example:</p> <ul style="list-style-type: none"> <li>• Gift Aid administration</li> </ul>

	<ul style="list-style-type: none"> <li>• Event registration</li> <li>• Health and contact records forms (for events)</li> <li>• Events coordination with event organisers</li> </ul> <p>Paper records for events are used rather than relying on secure digital systems, as often the events are held where internet and digital access will not be available. We will minimise the use of paper to only what is required for the event.</p>
<b>Further processing</b>	<p>If we wish to use your personal data for a new purpose, not covered by this Data Protection Policy, then we will provide you with a new information or an updated Policy explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.</p>
<b>How we provide this Data Protection Policy</b>	<p>A link to this website page is provided to those whose data is being processed by us. It can be found <a href="#">here</a>. A printed version is also available on request.</p>
<b>Your rights</b>	<p>As a Data Subject, you have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the Information Commissioner’s Office (<a href="http://www.ico.org.uk">www.ico.org.uk</a>).</p> <p>Unless subject to an exemption under the GDPR and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR, you have the following rights with respect to your personal data:</p> <ul style="list-style-type: none"> <li>• The right to be informed – you have a right to know how your data will be used by us.</li> <li>• The right to access your personal data – you can ask us to share with you the data we have about you. This is a Data Subject Access Request. If one wants to make such a request the following link describes the process to follow. <a href="#">Subject Access Requests   Scouts</a>.</li> <li>• The right to rectification – this just means you can update your data if it’s inaccurate or if something is missing. Adult members will be able to edit and update some information directly on The Scout Association’s online membership system.</li> <li>• The right to erasure – this means that you have the right to request that we delete any personal data we have about you. There are some exceptions, for example, some information will be held for legal reasons.</li> <li>• The right to restrict processing – if you think that we are not processing your data in line with this</li> </ul>

	<p>Data Protection Policy then you have the right to restrict any further use of that data until the issue is resolved.</p> <ul style="list-style-type: none"> <li>• The right to data portability – this means that if you ask us, we will have to share your data with you in a way that can be read digitally – such as a pdf. This makes it easier to share information with others.</li> <li>• The right to object – you can object to the ways your data is being used.</li> <li>• Rights in relation to automated decision making and profiling – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input, it’s highly unlikely that this will be used by us.</li> <li>• Any SAR for individuals within the 16<sup>th</sup> Wigan Group are to be addressed to the groups Data Lead email whose address can be found in the “Who we are” Section above. Similarly, the Data Lead is to be contacted in the first instance on any breach of the Group’s held data.</li> <li>• The following link describes the data breach process and contains a data breach form to be used <a href="#">Step 12: Responding to a breach   Scouts</a></li> </ul>
<p><b>Website Cookies</b></p>	<p><b>Forms related cookies</b></p> <p>Our website <a href="http://www.16thwiganscout.group.org.uk">www.16thwiganscout.group.org.uk</a> does not use cookies or analytics When you submit data through a form such as those found on our contact pages or comment forms 16th Wigan Group do not have access to any analytics or cookie information though the website cookies. may be set to remember you your user details for future correspondence.</p> <p><b>Third Party Cookies</b></p> <p>In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.</p> <p>This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.</p>

	For more information on Google Analytics cookies, see the official Google Privacy information <a href="#">page</a> .
<b>Who to contact</b>	If you have any queries relating to this Data Protection Policy or our use of your personal data, please contact us by emailing the 16 <sup>th</sup> Wigan Data Lead on the following email <a href="mailto:datalead@16thwiganscouts.org.uk">datalead@16thwiganscouts.org.uk</a> . For all other enquires contact <a href="mailto:gsl@16thwiganscouts.co.uk">gsl@16thwiganscouts.co.uk</a> .
<b>Version number and date of the last review</b>	Version 1 - 4 <sup>th</sup> March 2026. This will be reviewed annually