



# **Governance Documents**

## **Volume 2: Policies**

### **2.7: Data Retention Policy**

APPROVED 13 March 2025

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## **1      About this Document**

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### **1.1    Purpose**

Girl Guides Australia (GGA) and State Girl Guide Organisations (SGGOs) (collectively known as Girl Guiding in Australia or GGiA) recognise that organisations collect and hold significant data. This policy outlines the retention principles for managing that data.

This policy informs Adults in Guiding and Other Workers about the importance of data retention and provides guidance on how long data should be kept, as well as how it should be stored and handled. It defines what data should be retained, for how long and for what reason, so that GGiA can comply with applicable laws and regulations while also ensuring the security of personal information.

To facilitate this Policy, the Policy is to be made available to all Adults in Guiding, Youth Members and Other Workers of GGiA and all other groups participating in or affiliated with GGiA.

### **1.2    Application of the Policy**

This Policy applies to GGiA Adults in Guiding, Other Workers and all other groups participating in or affiliated with GGiA when they participate in or manage Girl Guide programs and activities, including fundraising and marketing activities.

Data collected to support operational Girl Guiding is to be appropriately retained and secured by the organisation collecting the data. Data collected from individuals must be held in accordance with the GGA Privacy Policy.

Storage of data collected by GGA or an SGGO is the responsibility of the organisation which collected the data.

### **1.3    Scope and Ownership**

The owner of this policy is the Board of GGA. The Board is responsible for approving, reviewing and adopting this policy.

This policy recognises the shared roles and responsibilities of all stakeholders of GGiA including GGA, SGGOs, Adults in Guiding, Youth Members and Other Workers.

### **1.4    Approval by the Board**

This document was approved by GGA Board on 13 MArch 2025.

### **1.5    Review**

The Board will review this document biennially unless legislation changes require the Board to undertake an earlier review.

### **1.6    Amendment**

The Board may amend this document at any time.

### **1.7    Responsibility**

Responsibilities under this policy are:

Position	Responsibility
Board	Policy owner
GPC	Policy custodian
CEO	Executive Office oversight

## 1.8 Document Management

### Approval and Change History

This table summarises the changes to and approval of this document. While the document is reviewed biennially (or otherwise required by law), it is only subject to approval if changed.

Version	Author	Date	Approved By	Comments
V1	CEO	23/12/2022	GGA	Initial document creation
V2	CEO	13/03/2025	GGA	SGGO feedback incorporated

## 1.9 Related Policies and Documents

Policies and guidelines are not incorporated into individual contracts of engagement or membership and can be altered at any time at the sole discretion of GGA or and SGGO. This policy operates in conjunction with existing legal obligations, including those set out in terms of engagement or membership terms and other policies or guidelines, including:

- Girl Guide Promise and Guide Law;
- GGA Code of Conduct;
- GGA Child Safe Child Friendly Policy;
- GGA Diversity and Inclusion Policy;
- GGA Privacy Policy;
- GGA People and Performance Management Policy;
- GGA Risk Management Policy;
- GGA Whistle-blower Policy; and
- Any other related policy or procedure

## 1.10 Related legislation

- Privacy Act 1988
- Copyright Act 1968
- Trademark Act 1995
- Information Privacy Act 2014 (Australian Capital Territory)

- Information Act 2002 (Northern Territory)
- Privacy and Personal Information Protection Act 1998 (New South Wales)
- Information Privacy Act 2009 (Queensland)
- Personal Information Protection Act 2004 (Tasmania), and
- Privacy and Data Protection Act 2014 (Victoria)
- Spam Act 2003 (Cth)
- Data Breach Notification Laws, which vary from state to state.
- The Australian Securities and Investments Commission (ASIC)

General Data Protection Regulation (GDPR)

## **2 Policy**

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### **2.1 Overview**

#### **2.1.1 Background**

Personal data retention is governed by current Data Protection legislation. This provides that data must be kept accurately, up to date and retained for no longer than is necessary for the purpose for which they were obtained. Detail of retention periods can be found in Annex 2 – Retention periods.

#### **2.2.2 What this policy covers**

This policy specifically covers all GGiA data and includes both historical, current and future data. Data is collected from individuals to support:

1. Recruitment
2. Membership
3. Girl Guiding operations
4. Fundraising
5. Donations
6. Marketing

The policy outlines how the long data should be retained by an organisation.

#### **2.2 Lawful Processing of Data**

Where personal data is processed using the lawful basis of legitimate interest or consent, the individual has a number of rights that they can exercise over this data, such as to delete or rectify. How an individual's data is managed is clearly outlined in the GGA Collection Statement available on *Guide Lines* and the GGA website.

#### **2.3 De-identification of Data**

In some instances, data should be de-identified prior to sharing or retaining for an extended period of time. De-identification is a privacy-enhancing tool. When done well, it, it supports GGiA to meet its obligations under the Privacy Act and build trust in data governance practices.

#### **2.4 Retention Periods**

Under Australian Privacy legislation and the GGA Child Safe Child Friendly Framework, GGA and SGGOs are required to retain personal information for a specific period of time. GGA and SGGOs will

have appropriate procedures in place to support compliance with data retention requirements appropriate to the organisation. Once legal retention periods have lapsed, GGA and SGGOs may delete information that is no longer required to be retained under the requirements of the GGA Child Safe Child Friendly Framework. Data retention periods are included in Appendix 2.

## Appendix 1: Definitions and Abbreviations

Term	Definition/Abbreviation
<b>Adults in Guiding</b>	Adult Members, Volunteers or Employees.
<b>Adult Members</b>	An adult member of Girl Guides Australia or a State Girl Guide Organisation is aged eighteen years or over, who lives their life as a female and satisfies the other requirements for membership.
<b>Board</b>	The Board of GGA.
<b>Employees</b>	A person employed by GGA or a SGGO.
<b>Individual</b>	Any person.
<b>Girl Guiding in Australia (GGiA)</b>	The collective name for Girl Guides Australia and all of the State Girl Guide Organisations.
<b>Girl Guides Australia (GGA)</b>	GGA: National Girl Guide Organisation
<b>Members</b>	A person who is an individual member of GGA or a member of an SGGO, whether they are an Adult Member or a Youth Member.
<b>Other Workers</b>	A person doing paid or unpaid work for or on behalf of GGA or an SGGOs that is not an Adult in Guiding. This extends to contractors and placement/work experience students.
<b>State Girl Guide Organisations (SGGO)</b>	The 'State-based' Girl Guide organisations within Australia. Namely: <ul style="list-style-type: none"> <li>• Girl Guides NSW, ACT &amp; NT</li> <li>• Girl Guides Queensland</li> <li>• Girl Guides South Australia</li> <li>• Girl Guides Tasmania</li> <li>• Girl Guides Victoria</li> <li>• Girl Guides Western Australia.</li> </ul>
<b>Youth Member</b>	Current financial Members of a SGGO under 18 years of age.
<b>Volunteers</b>	A person doing unpaid work for or on behalf of GGA or a SGGO. All Adult Members are considered to be Volunteers.
<b>Workers</b>	Adults in Guiding and Other Workers

## Appendix 2: Retention Periods

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Member (Youth and Adult) and Volunteer 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
Membership Data – including the role and dates of joining	Personal and Sensitive Data (special category)	10 years past the last engagement with GGiA the data will be reduced to only include name, date of birth, qualifications, awards, training records, events attended, records of any incidents at events attended, roles held and any personnel records including complaints in summary format. This remaining data will be retained for 100 years in to support any child safety claim which may be raised during the lifetime of the individual.	The 10-year retention membership data is required to provide tenure and service records in the event an individual wants to re-join.  The 100 years retention of Youth Member, Adult in Guiding data is required for evidence requests from statutory agencies and legal proceedings.
Youth award completions	Personal data and Sensitive Data (special category including citation)	Permanent for basic data; name, District, Region awards, membership number, completion date and presentation date	Historic record of award completions
Adult award applications	Personal and Sensitive Data (special category including citation)	12 months after the registration unless successful	To retain their award applications for the duration of the eligibility period
Adult qualification and award applications	Personal Data and Sensitive Data (special category including citation)	Permanent for basic data; name, District, Region, qualification, award, membership number, completion date, presentation date and citations if relevant.	Historic record of qualification and awards
Research surveys	Personal and Sensitive Data (special category)	5 years	To keep a collation of completing members and compare answers from the previous year

MUST-REFER conduct/allegations.	Personal and Sensitive Data (special category)	All case notes, including those of witnesses and the individual involved in the case, as well as any litigation correspondence until it is appropriate to reduce these to a concise summary. If the allegation proves false or is found to be incorrectly recorded originally, the record will include a statement that absolves the subject from responsibility and that their data should be subject to the retention period outlined by joining data process. The record shall remain for a period of 100 years after the closure of the case.	Required for evidence requests from statutory agencies and legal proceedings.
Safeguarding – Young person -Welfare	Personal and Sensitive Data	Young Person – retained for 100 years in to support any child safety claim which may be raised during the lifetime of the individual	Required for evidence requests from statutory agencies and legal proceedings.
GGiA Marketing Stories	Personal Data	5 years after submission	Required for the Marketing Communications team to ascertain if a story is newsworthy during this period
<b>Donor Data</b>			
Data Process	Data Type	Retention	Justification
Individual Givers	Personal Data	10 years post last donation or last positive interaction with organisations (GGA or SGGO), whichever is longer	To keep an individual informed of their donation and other fundraising campaigns
	Tax deductible donations	5 years after the end of the year or accounting period that includes the last donation	Tax Audit
	Direct debit mandate	5 years after the end of the year or accounting period	As proof of Direct Debit Instruction (DDI) and to

		that includes the last Direct Debit	assist in claims against that DDI
Partnerships	Personal Data	10 Years	To answer queries on the donations and maintain a record of partner donors or to support Tax Audit processes.
Legacy Donors	Personal Data	Permanent	To maintain record of the donation
Major Donors	Personal Data	10 years post last donation or last positive interaction with organisations (GGA or SGGO), whichever is longer	To keep an individual informed of their donation and other fundraising campaigns
<b>Event registrants and participants data</b>			
Data Process	Data Type	Retention	Justification
Ad-hoc events	Personal and Sensitive Data	Event program location, transport details, incident forms, activities, providers of activities to be retained along with Youth Member and Adult in Guiding and any other person attendance records retained for 100 years to support any child safety claim which may be raised during the lifetime of the individual	Required for enquiries on the event and responding to incidents.  To support reinviting participants for future events.  The 100 years retention of Youth Member, Adult in Guiding or Other Worker data is required for evidence requests from statutory agencies and legal proceedings.
Annual events	Personal and Sensitive Data	Event program location, transport details, incident forms, activities, providers of activities to be retained along with Youth Member and Adult in Guiding attendance records retained for 100 years to support any child safety claim which may be raised during the lifetime of the individual	To support reinviting participants for future events.  The 100 years retention of Youth Member, Adult in Guiding or Other Worker data is required for evidence requests from statutory agencies and legal proceedings.
International events	Personal and Sensitive Data	Event program location, transport details, incident forms, activities, providers of activities to be retained along with Youth Member	The 100 years retention of Youth Member, Adult in Guiding or Other Worker data is required for evidence requests

		and Adult in Guiding attendance records retained for 100 years to support any child safety claim which may be raised during the lifetime of the individual	from statutory agencies and legal proceedings.
Event Permits and licenses	Personal Data	6 months after the permit expires	To retain a record of permits and licenses held
<b>Insurance Data (including claims)</b>			
Data Process	Data Type	Retention	Justification
Non-liability cover	Personal and Sensitive Data	7 years after case closure	To meet statutory requirements.
Liability cover	Personal and Sensitive Data	All case notes, insurance claim documents, as well as any correspondence until it is appropriate to reduce these to a concise summary. If the allegation proves false or is found to be incorrectly recorded originally, the record will include a statement that absolves the subject from responsibility and that their data should be subject to the retention period outlined by joining data process. The record shall remain for a period of 100 hundred years after the closure of the case.	Required for required for evidence requests from statutory agencies and legal proceedings.  The 100 years retention of Youth Member, Adult in Guiding or Other Worker data is required for evidence requests from statutory agencies and legal proceedings.
<b>Girl Guide Retail Outlets</b>			
Data Process	Data Type	Retention	Justification
Girl Guide Retail outlets purchase	Personal Data	7 years after account closure	Required for enquiries on purchases and account
Girl Guide Retail outlets purchase	Transaction data	7 years after the end of the tax year for that purchase or duration of warranty period, whichever is longest	Tax Audit or warranty period
Prospect customers - enquiries	Personal Data	18 months after enquiry	To keep in communication with the enquirer
<b>Archives</b>			
Data Process	Data Type	Retention	Justification

Heritage Collection (includes business archive)	Personal Data	Permanent	Required for historical, research and statistical purposes
Donor (entry and accession) records/registers	Personal Data	Permanent	Required for historical, research and statistical purposes
Information gathered as a result of an enquiry	Personal Data	100 years from date of enquiry to support any child safety claim which may be raised during the lifetime of the individual	Required for required for evidence requests from statutory agencies
Object Exit Files and register	Personal Data	Permanent	Required for historical, research and statistical purposes
Loan In and Out files	Personal Data	Permanent	Required for historical, research and statistical purposes
<b>Legal Services</b>			
Data Process	Data Type	Retention	Justification
Title deeds and associated information, including communications	Personal Data	Permanent (or until 7 years after disposal of property)	Required for proof of ownership.
Estate claims against title deeds	Personal Data	Permanent	Required for proof of ownership.
Various pre action and litigated actions, to include Simple claims in contract, tort, fraud or negligence	Personal and Sensitive Data	Retained for 100 years to support any child safety claim which may be raised during the lifetime of the individual	Required for required for evidence requests from statutory agencies and legal proceedings.  The 100 years retention of Youth Member, Adult in Guiding or Other Worker data is required for evidence requests from statutory agencies and legal proceedings.
Litigation action: defamation	Personal and Sensitive Data	Permanent	
Legacies	Personal and sensitive Data	7 years from the administration of the estate	
Contracts	Personal Data	7 years beyond the end of the contract or if externally funded the time period	

		specified in the funding agreement which can be 10 or 12 years for some government funding.	
General advice	Personal Data	7 years unless required longer to defend a position where general advice has been given.  100 years if the matter relates to an individual.	General advice required for evidence requests from statutory agencies and legal proceedings.
<b>Employee and Other Worker Data</b>			
Data Process	Data Type	Retention	Justification
Income tax and Superannuation records	Personal Data	7 years from the end of financial year to which they relate	To meet statutory requirements.
Payroll wage/salary records (also overtime, bonuses, expenses)	Personal Data	7 years from the end of the tax year to which they relate	To meet statutory requirements.
Statutory Maternity Pay records, calculations, certificates or other medical evidence	Personal Data and Health Data	7 years after the end of the tax year in which the maternity period ends	To meet statutory requirements.
Working time records	Personal Data	7 years from date on which they were made unless they have contact with Youth Members or Youth Member Data then records are to be retained for 100 years to support any child safety claim which may be raised during the lifetime of the individual	The 100 years retention of Youth Member, Adult in Guiding or Other Worker data is required for evidence requests from statutory agencies and legal proceedings.
Personnel records, including training.	Personal and Sensitive Data (special category)	CSCF Training records retained for 100 years to support any child safety claim which may be raised during the lifetime of the individual. Other records can be retained for 7 years after they have exited the organisation.	The 100 years retention of Youth Member, Adult in Guiding or Other Worker data is required for evidence requests from statutory agencies and legal proceedings.
Recruitment records	Personal Data	2 years after the candidate has not been successful	To defend in tribunals

Emails and personal data volumes	Personal and Sensitive Data	<p>7 years after the employee has left or retained for 100 years to support any child safety claim which may be raised during the lifetime of the individual.</p>	<p>To answer queries that are contained in these data sources</p> <p>For accounts that deal with subject matter relating to Youth Members, Adults in Guiding, Other Workers or providers to or any matters that would relate to CSCF, the 100 years retention of data is required for evidence requests from statutory agencies or legal proceedings.</p>
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