

Data Protection & Privacy Policy

Introduction

Soirbheas is a registered charity and company limited by guarantee (incorporated in Scotland). We are committed to protecting any personal data that we collect, in accordance with the requirements of the Data Protection Act 2018 (DPA2018) and the UK General Data Protection Regulation (GDPR) (together the data protection legislation). This policy sets out our lawful basis for collecting, storing and protecting an individuals' personal data.

Information Collected

If you are a member of Soirbheas, or a representative of a community group or local business, following the lawful basis of consent we will usually collect:

- Your name
- Your organisations name if applicable
- Your contact details (address, email and telephone)

If you are in receipt of a grant, or applying for a grant or other support we will collect:

- Your name
- Your organisations name
- Your contact details (address, email and telephone)
- Bank details of the organisation receiving a grant (not personal banking details)

Where appropriate, we may also ask for:

- Information relating to your organisation
- Areas of special interest to you as a member of our organisation
- Where we have provided project funding or organised an event we may post photographs on our web site or on social media and for reporting to our funders

We will mainly use your information to:

- Provide you with member services, relevant information and communications. And administration in relation to our activities,
- Keep a record of your relationship with us,
- Ensure we know how you prefer to be contacted,
- Understand how we can improve our service to our members, and invite you to our range of events and make you aware of the work of our partners

As a member or representative of a local organisation you consent to the use of the data that we collect in accordance with this Policy. You can withdraw your consent at any time by contacting us – see details at the end of the Policy.

Employees, Directors and Volunteers of Soirbheas

If you are an employee, director, or volunteer of Soirbheas we will collect your name; address; telephone; email details; date of birth; national insurance number; and any other information as may be required by insurers; tax; regulatory or other authorities as appropriate. We will also keep a record of any potential conflicts of interest that might affect your role while working or volunteering for Soirbheas. For employees - and for directors where required - we will gather bank account details if such information is needed in connection with the operation of the

business. We require this information on the lawful basis of processing a contract. We have an additional legal obligation to safeguard clients in the Befriending Service and will gather information which may include criminal convictions. This information will be treated in the strictest confidence.

We will mainly use your details to:

- Communicate with you and other employees and directors and to provide information and administration in connection with Soirbheas business
- Keep a record of your appointment and service with Soirbheas
- Keep a record of your other professional memberships, employment, and connection with local groups.
- Supply information when required and appropriate to insurers, tax, regulatory and other authorities.
- Volunteer befrienders undergo PVG checks for working with protected adults. The Befriending Coordinator arranges and verifies these checks. Results are accessed through a secure, time-limited link. Relevant check details and confirmation that the check has been reviewed are recorded securely in the befriending Monday.com system, with access restricted to authorised staff. Volunteers are informed about the process during registration and induction.

As an employee, director or volunteer you consent to the use of the data that we collect in accordance with this Policy and the additional lawful basis' that apply.

Non-members of Soirbheas

If you contact our organisation for information, general advice, or signposting to one of our Partners, or another local Third Sector Organisations, we will not normally record your personal details (other than contact details). We will ask your permission to share your information if a referral form is required by an outside organisation, we will not store this form unless we need to get back to you or follow up on a request. We securely store names and address of residents from the open electoral register in order to keep them informed of our activities and opportunities in the community via our bi-annual newsletter. If you sign up for our newsletter through the website you can unsubscribe at anytime and we will not retain your details nor pass them on to a third party.

Database of Groups

If you provide your information when acting as a representative of a group, these details will be made available to the public and shared with other groups and organisations. We will review the database annually to ensure records are kept up to date. The contact person or representative from the group is asked to inform us if their contact details change within the year so we can update the file.

Database of Local Businesses

We hold a database of local businesses to provide them with information on our activities and funding opportunities. We will review this annually to ensure our records are kept up to date.

Keeping your Information Safe and Secure

We ensure that only those people with a specific requirement to access your personal information will be able to access it.

We will not record digital meetings without consent from everyone participating.

Data Controllers – are the people who, or organisations which, decide the purposes and the means for which, any personal data is processed. They have a responsibility to process personal data in compliance with the legislation.

Data Processors – include any person who processes personal data on behalf of a data controller.

We undertake annual reviews of our data protection procedures, including who has access to information that we hold. This allows us to ensure that your information is only accessible by appropriate members of our team and used for the purpose for which it is intended.

Safeguarding records will be held in a designated secure records area, separately from routine volunteer records. Access will be restricted to those who need the information to fulfil their safeguarding responsibilities.

Electronic Storage and Communication

- Access to our systems is through authorised use and password protection only. This includes passwords on databases where we store your details.
- We use MailChimp which has industry standard security built into its operation to send mass email. We only store your email address in this database.
- Where personal information is transferred outside the UK, we will ensure the transfer complies with UK data protection requirements and that appropriate protections are in place.
- We may need to disclose your details if required to the police, regulatory bodies, or legal advisers.
- Any sharing of personal information will follow the Disclosing Information section of this policy.

We are committed to protecting your privacy

We collect the minimum amount of information about you that is commensurate with maintaining an up-to-date register of members and facilitating the operation and administration of the charity. This Policy indicates the type of processes that may result in data being collected about you.

We will identify an appropriate lawful basis for collecting and using personal information. Providing information to us does not automatically mean that consent is the lawful basis for every use.

We comply with the UK GDPR data protection principles below.

Data protection principles

1. Lawfulness, fairness and transparency: Personal information will be used lawfully, fairly and transparently.
2. Purpose limitation: Information will be collected for specified, explicit and legitimate purposes and will not be used incompatibly with those purposes.
3. Data minimisation: We will collect and use only information that is adequate, relevant and necessary.
4. Accuracy: Information will be accurate and kept up to date where necessary.
5. Storage limitation: Information will be kept only for as long as necessary for its purpose, following our retention arrangements.
6. Integrity and confidentiality: Appropriate security measures will protect information against unauthorised or unlawful use, accidental loss, destruction or damage.
7. Accountability: Soirbheas is responsible for complying with these principles and demonstrating that compliance.

Information Use

We use the information collected in connection with our charitable activities, primarily to maintain an up-to-date register of members contact information, provide support and information to the community, local groups and businesses, and to distribute funding. All

reasonable precautions are taken to prevent unauthorised access to this information. This safeguard may require you to provide additional forms of identity should you wish to obtain information about the data we hold about you.

Membership

We are required by law to permanently maintain a database of members details. Membership is for life, or as long as the charity is in existence, and we will retain these records securely until they cease Membership. Membership will cease when:

- you are no longer resident in our area (Glen Urquhart or Strathglass)
- you notify us in writing that you wish to terminate your membership
- if you are expelled from membership
- membership can not be passed on to another person when a member is deceased

We will retain records as follows:

- We will retain membership details for the duration of membership. When membership ceases, we will retain details for 6 years. At the end of this period, we will only retain an archive list of name, reason for termination and termination date. Contact details for deceased members shall not be retained.
- We ask members to inform us of any changes to their contact details and preferences, and we issue a contact update form with AGM papers.
- Contact you if you have unsubscribed from our email system to confirm if you wish to remain a member but do not wish to receive emails

Grants

To provide an audit trail, information in relation to successful grant applications will be retained for 6 years, and for unsuccessful grants information will be held for three years.

Community and Business Databases

Information in relation to community contacts and businesses is reviewed annually in an endeavour to keep it up to date.

We will review our database of residents from the open register every two years and delete old versions.

Employee, Director and Volunteer Records

- Pre-employment application forms and information will be retained for 6 months after an appointment has been made but extend to one year if a further appointment is anticipated.
- Employment records will be retained for the duration of employment plus 7 years after termination of employment.
- Pension records and retirement dates are retained indefinitely.
- Employee expense reports are retained for 10 years.
- Volunteer records – retain for duration of placement or involvement plus 1 year.
- Safeguarding records – records of abuse allegations and safeguarding concerns will be retained securely for 25 years after the concern or case is closed, separately from routine volunteer records. Relevant records must not be destroyed while a claim, investigation or related proceedings remain ongoing. This specific retention rule takes precedence over the routine employee, director or volunteer retention periods for records relating to the safeguarding concern.
- Director forms are retained for duration of directorship plus 50 years.
- List of directors and period of service are retained in perpetuity.

Disclosing Information

We will only share personal information where we have an appropriate lawful basis and meet any additional requirements for sensitive information. This may include sharing information for safeguarding, legal obligations or handling insurance claims.

We will share only what is necessary, with appropriate recipients, and record the reason for sharing. Consent will be sought where appropriate, but confidentiality or lack of consent must not prevent a necessary and lawful safeguarding referral.

Changes to this Policy

We will review the policy annually and take reasonable steps to draw your attention to any changes made.

Updated: 13 October 2026

Next review: 13 October 2027

Contacting Us

Soirbheas is responsible for compliance with data protection legislation, with oversight from the Board. The Community Grants Manager coordinates day-to-day arrangements and is the main contact for data protection questions and requests.

Any questions or concerns about this policy, or requests for a copy of the personal information we hold about you, should be sent to the Community Grants Manager at info@soirbheas.org or raised by telephone on 07842 781986.

Version number	Change or update	Author or owner	Date
3.0	Updated	L Treasure	26/1/26
4.0	Updated safeguarding retention and secure storage, information sharing,	K Scott	13/10/2026

	data protection principles, international transfers, responsibilities and contact details		