Soirbheas
Investing in the communities of Glen Urquhart & Strathglass

Company Limited by Guarantee
Registered in Scotland No. 356487
Registered Office:
4th Floor Metropolitan House
31-33 High Street
Inverness
IV63 1HT
Registered Scottish **Charity** No: SC041340

Data Protection & Privacy Policy

Introduction

Soirbheas is a registered charity and company limited by guarantee (incorporated in Scotland). We are committed to protecting personal data in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). This policy explains what personal information we collect, why we use it, how we protect it and the rights available to individuals.

Information Collected

If you are a member of Soirbheas, or a representative of a community group or local business, we will usually collect:

- Your name
- Your organisation's 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 organisation's 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 publish photographs on our website or social media and use them in reports to our funders

We will mainly use your information to:

- Provide member services, relevant information and communications, and administer 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

We use this information to administer membership, provide services, communicate about our activities and opportunities, and maintain our relationship with members and local organisations. Depending on the purpose, we may rely on legitimate interests, legal obligation, performance of an agreement, or consent where we have specifically asked for it. Where we rely on consent, you may withdraw it at any time by contacting us.

Employees, Directors and Volunteers of Soirbheas

If you are an employee, director or volunteer of Soirbheas, we will collect your name, address, telephone number, email address, date of birth, National Insurance number and any other information required by insurers, tax, regulatory or other authorities, as appropriate. We will also keep a record of 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 where needed for the operation of the Charity. We process this information where necessary to perform an employment or other agreement, meet our legal obligations and administer the Charity. We also have safeguarding responsibilities in the Befriending Service and may process information relating to criminal convictions where permitted by law. This information will be treated in strict 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.

We use employee, director and volunteer information where necessary to manage the working or volunteering relationship, meet our legal obligations, protect individuals, and support the legitimate administration of the Charity. Where information is particularly sensitive, including criminal offence data, we will process it only where permitted by law and subject to the additional safeguards required by data protection legislation.

Non-members of Soirbheas

If you contact us for information, general advice or signposting to a partner or another local third-sector organisation, we will not normally record personal details other than the contact information needed to respond. If a referral form is required by another organisation, we will ask permission before sharing information and will retain the form only where necessary to respond or follow up. We use names and addresses from the open electoral register to inform local residents about activities and opportunities through our twice-yearly newsletter. If you subscribe to our email newsletter through the website, you can unsubscribe at any time.

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.

Where we get personal information

We normally collect personal information directly from the individual or from an organisation they represent. We may also receive information from publicly available sources, including the open electoral register and Companies House, or from referees, partner organisations, service providers and relevant public authorities where appropriate.

Automated decision-making

We do not make decisions that have legal or similarly significant effects on individuals based solely on automated processing.

Monitoring of Charity systems

Where permitted by law, we may monitor the use of Charity-owned systems, devices and communications for legitimate purposes including information security, regulatory compliance, preventing unauthorised access, investigating suspected misconduct and maintaining business continuity. Any monitoring will be necessary, proportionate and carried out in accordance with data protection legislation. Employees are given further information in the Employee Handbook and relevant staff privacy information.

Membership

We are required to maintain a register of members. Membership is for life, or for as long as the Charity remains in existence, and we will retain membership records securely until membership ceases. 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 cannot be passed to another person when a member dies

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.
- We may contact you if you have unsubscribed from our email system to confirm whether you wish to remain a member without receiving 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, or for up to one year where 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 will be retained for the duration of the 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. Depending on the circumstances, recipients may include our professional advisers, accountants, payroll or pension providers,

insurers, IT and website providers, secure system providers, funders, auditors, partner organisations, regulatory bodies, the police or other public authorities. This may include sharing information for safeguarding, legal obligations, grant administration, audit requirements 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.

Your data protection rights

Depending on the circumstances and the lawful basis we rely on, you may have the right to:

- ask for access to your personal information;
- ask us to correct inaccurate or incomplete information;
- ask us to delete your information;
- ask us to restrict how we use your information;
- object to our use of your information;
- ask for information you provided to be transferred to you or another organisation; and
- withdraw consent at any time where we rely on consent.

These rights are not absolute and exemptions may apply. We will respond to valid rights requests without undue delay and normally within one month. Requests should be sent using the contact details below.

Changes to this Policy

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

Updated: 2 November 2026

Next review: 2 November 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.

If you are concerned about how we have handled your personal information, you may raise a complaint in accordance with our Data Protection Complaints Policy. Complaints should be sent to the Community Grants Manager at info@soirbheas.org. If the complaint concerns the Community Grants Manager, it should instead be sent to the Chair of the Board at chair@soirbheas.org.

If you remain unhappy following our response, you have the right to complain to the Information Commissioner's Office (ICO). You can contact the ICO through www.ico.org.uk/make-a-complaint or by telephone on 0303 123 1113.

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, data protection principles, international transfers, responsibilities and contact details	K Scott	13/10/2026
4.2	Expanded privacy information, employee monitoring and complaints route	K Scott	02/11/2026