



Move More

Data Protection Policy

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Statement of Policy Understanding

You must read this policy because it explains:

- Move More's commitment to compliance with UK data protection legislation and regulatory expectations
- the overarching principles, standards and governance arrangements that underpin how personal data is handled across the organisation
- the organisational and individual responsibilities for lawful, fair and secure processing of personal data
- the consequences of non-compliance with data protection requirements; and,
- how this policy links to, and should be read alongside, more detailed procedures, privacy notices and supporting documents that provide operational guidance and specific privacy information.

Once you have read and understood this policy, please confirm that you have done so by signing and returning the attached copy to Administration and Operations Co-Ordinator.

Staff Declaration

I confirm that I have read and understood the *Move More Data Protection Policy*.

I agree to comply with its requirements and understand my responsibilities regarding the handling of personal data.

I am aware that failure to comply with this policy may result in disciplinary or other appropriate action.

Name: _____

Signature: _____

Date: _____

1 Policy Statement

Move More is fully committed to compliance with the requirements of the UK General Data Protection Regulation and Data Protection Act 2018 as amended by the Data Use and Access Act 2025. As a charity working with schools, children, families and communities, we recognise that trust and accountability are fundamental.

This policy sets out the principles, standards and responsibilities that must be followed by all employees, trustees and volunteers, contractors, agents, consultants, or partners who have access to personal data held by or on behalf of the charity. Failure to comply with this policy may result in disciplinary action for staff or contractual action for contractors and third parties, up to and including termination of employment or contract.

2 Purpose

Move More collects and processes personal data in order to carry out its charitable activities and fulfil its legal, regulatory and operational responsibilities. The lawful and proper handling of personal data is essential to the effective operation of the charity and to maintaining the trust and confidence of those with whom it works.

The purpose of this policy is to set out how Move More ensures compliance with the relevant data protection legislation. It explains the principles, organisational measures and individual responsibilities that apply to the processing of personal data and outlines the framework for protecting individuals' rights and monitoring compliance.

This policy is supported by more detailed procedures and guidance, which are referenced within this document and made available through the charity's internal and public information channels.

2.1 Separation of Policy and Operational Detail

This policy sets out the overarching principles, standards, governance arrangements, and responsibilities for data protection within Move More. As part of this review, detailed operational and process-level instructions have been removed from the policy to ensure it remains clear, accessible and focused on organisational accountability.

Operational procedures, guidance and templates will be developed and maintained separately to support the implementation of this policy. This approach allows operational detail to be updated as required in response to changes in legislation, risk, systems or working practices, without the need for formal policy re-approval.

3 Legal Context and Definitions

3.1 Legal Context

The following legislation provides the legal framework governing the processing and protection of personal data by Move More:

- *UK General Data Protection Regulation (UK GDPR)*: Sets out the core principles, rights and obligations for the lawful processing of personal data in the UK.
- *Data Protection Act 2018 (DPA)*: Supplements the UK GDPR and provides additional provisions for data protection within the UK legal framework.
- *Data Use and Access Act 2025 (DUAA)*: Amends and updates the UK GDPR and the Data Protection Act 2018, introducing further requirements and clarifications relating to the use, access and sharing of data.

Together, these laws establish the standards governing how Move More collects, uses, stores, and shares personal data, ensuring that individuals' rights are protected and that the charity meets its statutory obligations.

The Information Commission (formerly the Information Commissioner's Office) is the UK's independent regulatory authority responsible for overseeing compliance with data protection legislation, investigating complaints, and enforcing data protection law.

Move More is registered with the Information Commissioner under registration number ZA500461.

3.2 Definitions

The UK GDPR distinguishes between personal data, special category data and criminal convictions and offences data, each of which is subject to different conditions of processing.

Personal data means any information relating to an identified or identifiable natural person ('data subject'). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special Category data is defined as personal data that reveals or relates to:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying a natural person
- health data; or,
- data concerning a person's sex life or sexual orientation.

Criminal convictions and offences data means personal data relating to criminal convictions, criminal offences, allegations of criminal behaviour, or related security measures. This type of data must only be processed where specific legal conditions are met and with appropriate safeguards

For the purposes of this policy:

A **Data Subject** is an individual to whom personal data relates.

A **Data Controller** is an organisation, or legal person, that determines the purposes and means of processing personal data

A **Data Processor** is an organisation or person other than an employee, that processes data on behalf of the Data Controller.

Processing means any operation performed on personal data, whether automated or manual, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

4 Scope

4.1 Context of this policy

This policy:

- applies to all employees, trustees, and volunteers, contractors, agents, consultants, or partners that use personal data in support of their work on behalf of Move More.
- applies to all personal data processed by Move More in relation to its workforce, volunteers, contractors, clients, service users, donors, supporters and other individuals connected with the charity's activities.
- applies to all forms of processing, whether automated or manual
-
- should be read in conjunction with the Employee Code of Conduct governing the professional conduct and standards of staff.
- links with other Move More policies, including:
 - Records Management Policy
 - ICT Security Policy
 - Email and Internet Use Policies
 - Human Resources Policies
 - Criminal Records Bureau Staff checks (Disclosure and Barring Service) Policy and Procedures.
- may be supported by other policies and agreements and information sharing protocols for specific areas of work.

This policy should be read alongside supporting data protection procedures and guidance, where available.

Procedures and guidance for specific areas of work or specific data protection issues, and supported by additional policies outlined in section 15.

This policy supersedes all previous versions of the Data Protection Policy.

4.2 Personal data held

This policy applies to all processing of personal data held by Move More. This includes:

- Personal data processed by the charity.
- Personal data controlled by the charity but processed by another organisation, on the charity's behalf (for example, private sector contractors, and Service Level Agreements with voluntary sector organisations).
- Personal data processed jointly by the charity and its partners

The policy does not cover personal data held by a Local Authority or the Department for Education which are Data Controllers in their own right.

Personal data held by the charity may be held in many forms, including:

- Electronic records (including databases, computer files, emails, and website data)
- Paper records (such as files, forms, documents and written correspondence)
- Audio-visual records (such as CCTV, video, sound recordings, and photographs)
- Other storage formats (including mobile devices)

Data subjects may include:

- Trustees and board members
- Employees (current, former and prospective staff members)
- School pupils (current, former or prospective participants in school-based programmes)
- Parents, carers, or guardians (of pupils or other service users)
- Service users (individuals who take part in Move More programmes, activities or events)

- Suppliers or service providers (Organisations or individuals providing goods or services to Move More)
- Current and former clients (organisations or individuals who are currently receiving, or have previously received, tailored services, support, or programmes from Move More)
- Funders (organisations or bodies that provide grants, sponsorship, or financial support to Move More).
- Donors (Individuals or organisations making financial or in-kind contributions)
- Volunteers (Individuals offering their time and skills to support Move More's work)
- Others with whom the charity communicates (any other individuals or organisations who interact with Move More, such as media contacts, local authorities, or members of the public making enquiries).

5 Responsibilities and Consequences of Non-Compliance

5.1 Organisational Responsibilities

Move More is a Data Controller under the data protection legislation and is responsible for ensuring that personal data is processed lawfully, fairly and transparently, and that appropriate technical and organisational measures are in place to protect personal data and uphold individuals' rights.

The Board of Trustees has overall responsibility for ensuring that Move More complies with the data protection legislation. The Board delegates day-to-day responsibility of data protection compliance to the Chief Executive Officer (CEO), who is responsible for implementing this policy and overseeing compliance across the organisation.

5.2 Individual Responsibilities

All employees, volunteers, and trustees must comply with this policy and any associated procedures at all times.

Individuals must:

- access and use personal data only where it is necessary for legitimate charity business purposes;
- handle personal data securely and confidentially, in accordance with this policy and related Move More policies
- not disclose personal data to unauthorised individuals or organisations; and,
- promptly report any actual or suspected data protection breaches or security incidents in line with the charity's procedures.

5.3 Contractors and Service Providers

All contractors and service providers who process personal data on behalf of Move More must comply with this policy and with applicable data protection legislation.

Where a contractor or service provider processes personal data on behalf of Move More, they will act as a Data Processor. Processing will be governed by a Data Processing Agreement (DPA), that meets the requirements of Article 28 of the UK General Data Protection Regulation

Such agreements will ensure that personal data is processed only on Move More's documented instructions and that appropriate technical and organisational measures are in place to protect the data.

5.4 Consequences of non-compliance

Failure to comply with the policy may result in:

- disciplinary action for employees, volunteers or trustees up to and including dismissal
- Contractual action for contractors or service providers, which may include termination of the contract

Unauthorised access to personal data, disclosure of personal data to unauthorised third parties, or misuse of personal data for non-charity purposes may constitute a criminal offence under data protection legislation and may result in criminal prosecution, in addition to disciplinary or contractual action.

Employees who deliberately access or use personal data for personal purposes will also be in breach of Move More policies, including but not limited to the Employee Code of Conduct, ICT Security Policy, and Social Media Policy.

6 Purposes of Processing & Lawful Bases

6.1 Data Protection Principles and Accountability

Move More processes personal data in line with the principles set out in Article 5 UK GDPR.

Personal data shall be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
- collected for specific, explicit and legitimate purposes. And not further processes in a manner that is incompatible with those purposes ('purpose limitation')
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation)
- accurate and, where necessary, kept up to date, with reasonable steps taken to rectify or erase inaccurate data without delay ('accuracy')
- kept in a form which permits identification of individuals for no longer than necessary of the purposes for which it was collected, in line with the retention policy ('storage limitation')
- processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage ('security')

Move More must be able to demonstrate compliance with these principles. This includes maintaining appropriate policies and procedures, providing training and guidance to staff and volunteers, monitoring compliance, and taking corrective action where necessary. ('accountability')

6.2 Purposes of Processing Personal Data

Move More will collect and process personal data only where it is necessary to deliver its charitable purposes, manage its workforce and volunteers, meet safeguarding obligations, support fundraising and partnerships, administer services and programmes, or comply with legal and regulatory requirements.

6.3 Lawful Bases for Processing

All processing of personal data will be carried out in line with one or more lawful bases set out in Article 6(1) of the UK GDPR:

- a) the data subject has given consent to the processing for one or more specific purposes
- b) processing is necessary for the performance of a contract to which the data subject is a party, or prior to entering into a contract
- c) processing is necessary for compliance with a legal obligation
- d) Processing is necessary to protect the vital interests of the data subject or of another individual
- e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, where Move More is carrying out a function under statutory authority or formal delegation from a public body
- f) processing is necessary for the legitimate interest pursued by Move More, or a third party, except where such interests are overridden by the rights and freedoms of the data subject.

6.4 Consent

Move More will rely on consent as a lawful basis for processing personal data only where consent is the most appropriate basis and where the individual is able to exercise a genuine and free choice.

Move More will ensure that where consent is obtained, it is:

- freely given, specific, informed and unambiguous
- obtained through a clear affirmative action; and,
- supported by clear and accessible privacy information.

Consent will not be inferred from silence, inactivity or pre-ticked options, and will not be obtained where there is an imbalance of power or where another lawful basis is more appropriate.

Move More will keep appropriate records to demonstrate that valid consent has been obtained, including where consent is provided by a parent or carer on behalf of a child.

Individuals have the right to withdraw their consent at any time. They will be informed of this right at the point consent is obtained, and withdrawal will not affect the lawfulness of any processing carried out before consent was withdrawn.

6.5 Special Category Data

When special category data is collected and processed, Move More will rely on an additional condition for processing as detailed in Article 9(2) of the UK GDPR. Relevant conditions may include:

- Explicit consent of the data subject, where appropriate; (9(2)(a))
- Employment, social security or social protection obligations, where processing is necessary and authorised by law (9(2)(b))
- Protection of vital interests, where the data subject is physically or legally incapable of giving consent (9(2)(c))
- Establishment, exercise or defence of legal claims, including where processing is necessary for legal proceedings or obtaining legal advice (9(2)(f))
- Substantial public interest, including safeguarding children and vulnerable individuals, subject to appropriate safeguards (9(2)(g))
- Occupational health or health and social care purposes, including assessing working capacity, managing sickness absence, or complying with health and safety obligations, where appropriate safeguards are in place (9(2)(h))
- Public interest in the area of public health, such as protecting against serious cross-border threats to health, where processing is necessary and authorised by law

(9(2)(i)).

6.6 Criminal Convictions and Offences

Where criminal convictions and offences data is processed, Move More will do so only where permitted by law and in accordance with Article 10 of the UK General Data Protection Regulation and the Data Protection Act 2018.

Such data will be processed only where necessary and proportionate, typically for safeguarding, employment, volunteering, regulatory requirements or legal proceedings, and will be subject to appropriate safeguards to protect individuals' rights and freedoms.

6.7 Data Protection Impact Assessments

Move More will carry out a Data Protection Impact Assessment where processing is likely to pose a high risk to individuals' rights and freedoms, in accordance with the UK General Data Protection Regulation.

DPIAs will be used to identify and assess risks and determine appropriate measures to mitigate them before processing begins. Where required, the charity will consult with the Information Commission.

7 Fairness and Transparency

Move More is committed to processing personal data fairly, lawfully and transparently. We will ensure that individuals whose personal data we process are provided with clear, accessible and timely information about how their data is collected, used, stored and shared so that they can understand and exercise their rights.

Information provided to individuals will be concise, written in clear and plain language, and, where appropriate, tailored to the needs of children, parents, carers or other vulnerable individuals.

7.1 Transparency Information

Move More must provide individuals with clear information about how their personal data is processed by providing Privacy Notices, sometimes called fair processing notices.

Move More will ensure that privacy notices accurately describe:

- The categories of personal data processed
- The purposes of processing
- The lawful basis relied upon
- Any data sharing or transfers to third parties
- Retention periods or criteria
- Individual rights and how to exercise them
- Contact details for data protection queries or complaints

Privacy information will be made available before or at the point of data collection. Where personal data is obtained from a third party, the information will be provided within a reasonable period after collection, and no later than the first communication with the individual or disclosure of the data.

Failure to provide appropriate transparency information may render processing unlawful. All staff, volunteers, and trustees are expected to understand the importance of providing

accurate and timely privacy information in line with this policy.

7.2 Purpose-Limitation and Fair Use

Move More will ensure that personal data is processed only for specified, explicit and legitimate purposes.

Any proposed change in the use of personal data will be assessed to determine whether it is compatible with the original purpose for which the data was collected. Where processing for a new purpose is incompatible, appropriate compliance steps will be taken, which may include:

- updating privacy information;
- identifying a new lawful basis for processing; and
- obtaining consent where required.
-

Decisions relating to changes in purpose will be documented to demonstrate compliance with data protection legislation.

7.3 Accountability and Evidence of Compliance

Move More must be able to demonstrate compliance with the fairness and transparency principle at all times.

This includes maintaining:

- Records of processing activities (ROPA)
- Lawful basis assessments
- Legitimate Interest assessments
- Privacy notices and version histories
- DPIAs and risk assessments

Compliance must be reviewed periodically and following any material change to processing activities.

8 Data Quality, Integrity and Retention

Move More will ensure that personal data held is relevant, adequate, and limited to what is necessary for the purpose for which it is processed, and not excessive.

Reasonable steps will be taken to ensure that personal data is accurate and, where necessary, kept up to date. Inaccurate or out-of-date personal data will be corrected or erased without undue delay.

Move More will take appropriate measures to maintain the integrity and reliability of personal data throughout its lifecycle, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage.

Personal data will be retained only for as long as is necessary for the purposes for which it was collected. Retention periods will be determined in line with the charity's Records Management Policy and Retention Schedules, taking account of legal, regulatory, operational and safeguarding requirements and best practice.

Where personal data is no longer required, it will be securely deleted or destroyed in line with approved retention and disposal arrangements.

9 Individual (Data Subject) Rights

Move More is committed to ensuring that the rights of individuals whose personal data is processed by the charity are respected and can be fully exercised in line with the data protection legislation.

Individuals have rights in relation to their personal data, including:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to object to processing.
- the right to data portability
- the right to withdraw consent
- rights in relation to automated decision-making and profiling

Move More will respond to individual rights requests in line with statutory requirements and applicable timescales. Where necessary, the charity may seek additional information to verify the requester's identity or clarify the scope of the request.

Appropriate procedures, guidance and supporting documentation are in place to ensure that requests relating to individual rights are handled lawfully, consistently and fairly.

9.1 The Right to Complain

Individuals have the right to raise concerns or make a complaint about how Move More processes their personal data.

Move More will handle all data protection complaints fairly, promptly and in accordance with applicable data protection legislation. Individuals will be informed of their right to complain to the Information Commission, if they remain dissatisfied following the outcome of the internal complaint procedure.

Details of how to raise a complaint and how complaints are managed are set out in the charity's supporting procedures and privacy information.

10 Security

Move More will implement appropriate technical, operational, and physical security measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Security measures will be proportionate to the nature of the personal data processed and the risks posed, taking into account the sensitivity of the data and the context in which it is used.

All staff, volunteers and trustees are expected to understand their responsibilities for maintaining the security of personal data and to comply with the charity's security requirements and related policies. Security responsibilities are supported through appropriate training, guidance and awareness activity, and individuals are required to report security concerns or suspected incidents promptly in line with established procedures.

10.1 Technical and Organisational Measures

Move More will ensure that access to personal data is restricted to those individuals who require it for legitimate charity business purposes. Measures will be in place to prevent unauthorised access, misuse, alteration or disclosure of personal data.

Appropriate organisational controls will ensure that staff, volunteers and trustees understand their responsibilities for keeping personal data secure and are required to comply with the charity's ICT Security Policy and related information security procedures.

10.2 Physical Security Measures

Physical security measures will be implemented to protect personal data held in both manual and electronic form. These measures will include secure storage arrangements and appropriate physical access controls to offices, facilities, records, electronic devices and supporting infrastructure, to prevent unauthorised access, loss or damage.

10.3 Data Breaches and Security Incidents

All actual or suspected security incidents and personal data breaches must be reported promptly in accordance with the charity's information security incident procedures. Reported incidents will be assessed, investigated and addressed, and notified to the Information Commission within 72 hours of discovery, where required by law.

10.4 Review and Assurance

Security measures will be reviewed periodically and following any significant change to processing activities, systems, processes or risk levels. Where weaknesses or risks are identified, appropriate corrective actions will be taken to prevent unauthorised access to personal information.

11 Disclosure, Sharing and Third Parties

11.1 General Principles for Disclosure and Sharing

This section applies to the operational disclosure and sharing of personal data with third parties. Requests made by, or on behalf of, data subjects for access to their own personal data are handled separately in accordance with the charity's Individual (Data Subject) Rights procedures and are not treated as information sharing for the purposes of this section.

Move More only discloses or shares personal data where a clear and lawful basis exists, and where the disclosure or sharing is necessary, proportionate and consistent with the purposes for which the data was collected.

All disclosure and information-sharing activities are carried out in accordance with the principles of fairness, lawfulness, transparency, data minimisation and security. Move More takes responsibility for ensuring that any sharing of personal data complies with applicable data protection legislation.

In considering whether, how and to what extent personal data should be shared, Move More has regard to the Information Commissioner's *Code of Practice for Information Sharing*, ensuring that disclosures are lawful, justified, appropriately safeguarded and properly accountable.

11.2 Requests from Third Parties

When a third party requests access to personal data, Move More assesses the request to determine whether a lawful basis for disclosure exists and whether any legal restrictions or exemptions apply.

Move More does not disclose personal data to third parties unless permitted by law, and the circumstances justify such disclosure. Requests are handled in accordance with the charity's procedures for disclosure and information rights, as applicable.

11.3 Information Sharing

Move More supports lawful and responsible information sharing where it is necessary to protect individuals, deliver services, meet safeguarding or statutory obligations, or support the charity's functions.

Before sharing personal data, Move More ensures that:

- an appropriate lawful basis for sharing has been identified
- the sharing is relevant, necessary and proportionate
- appropriate technical and organisational safeguards are in place; and,
- the sharing is consistent with the original purpose for which the data was collected, or is otherwise permitted by law.

Where Move More undertakes regular, large-scale, or ongoing information sharing, the arrangements are documented in written information-sharing agreements that clearly set out roles, responsibilities, and safeguards.

11.4 Contractual and Partnership Arrangements

When Move More enters into contractual, commissioning or partnership arrangements that involve the processing of personal data, written agreements are put in place that clearly define whether the parties are acting as Data Controllers, joint controllers or data processors.

Where third parties process personal data on behalf of Move More, the charity requires appropriate contractual assurances in line with Article 28 UK GDPR, covering confidentiality, security, and the protection of individuals' rights.

Move More takes reasonable steps to monitor compliance and expects all partners, contractors and service providers to meet data protection standards equivalent to those applied by the charity.

11.5 International Transfers of Personal Data

Move More recognises that the transfer of personal data outside the United Kingdom is subject to specific legal requirements under the UK General Data Protection Regulation and may present additional risks to individuals.

Move More will not transfer personal data outside the United Kingdom unless the transfer is permitted by law and appropriate safeguards are in place to protect individuals' rights and freedoms.

International transfers of personal data will take place only where one or more lawful transfer mechanisms apply. These include transfers to countries recognised by the UK Government as providing an adequate level of data protection, the use of approved

safeguards, or a permitted statutory derogation under UK data protection law.

Move More will ensure that international data transfers are managed in accordance with its accountability obligations and kept under appropriate review.

12 Implementation

Responsibility for implementing this policy rests with Move More.

Move More is committed to ensuring that appropriate governance, oversight and assurance arrangements are in place to support compliance with the data protection legislation. This includes ensuring that:

- all individuals who manage or handle personal data understand their responsibilities under data protection legislation and this policy;
- appropriate training and awareness arrangements are in place to support compliance with good data protection practice;
- suitable supervision and management controls are in place where personal data is processed;
- enquiries and concerns relating to the handling of personal data are addressed appropriately and in a timely manner;
- arrangements are in place to promote continuous improvement, including the regular review of data handling practices and performance; and,
- staff are aware of their responsibilities in relation to personal data incidents and data breaches.

Move More will develop and maintain supporting procedures, guidance and training materials to provide operational instruction on how this policy is applied in practice. These supporting documents do not form part of this policy but are intended to underpin its effective implementation and may be updated as required without the need for formal policy review.

Compliance with this policy will be monitored through proportionate assurance measures, which may include training activities, internal reviews or audits, and reporting arrangements. The Board of Trustees will receive appropriate information to support oversight of data protection and information governance, including notification of any significant data protection incidents.

13 Related Policies

This policy should be interpreted and applied in conjunction with other Move More policies and supporting documents. A breach of these related policies may also constitute a breach of this policy and may result in non-compliance with the UK General Data Protection Regulation and other applicable legislation.

Related policies and documents include, but are not limited to, the following, and such other policies as may be adopted by the charity from time to time:

- ICT Security Policy
- Move More Employee Staff Handbook
- Subject Access Policy and Procedures
- Records Management Policy
- Record Retention Schedule

14 Monitoring and Review

The implementation and effectiveness of this policy will be monitored through Move More's governance and assurance arrangements.

The Board of Governors will review the policy at least every two years, or as necessary in response to changes in the regulatory environment, Move More's data processing activities, or a significant data protection incident that requires an earlier review.

Appendix 1: Move More – Data Protection Policy Review: April 2026

Table of Policy Updates and Deletions – All Numbered Sections

Section	Original Policy Position	Updated Policy (DPO Redraft)	Reason / Board Rationale
Statement of Policy Understanding	Not included	New mandatory staff declaration and acknowledgement section	Strengthens accountability, training assurance and audit evidence
1. Policy Statement	Focused on GDPR/DPA compliance only	Updated to include DAUA 2025 and charitable context	Legal accuracy and clearer values-based framing
2. Purpose	Lengthy operational explanation	Clear purpose focused on the compliance framework	Improves clarity and readability
2.1 Separation of Policy & Procedures	Separation between policy and detailed procedures was referenced but not consistently applied; operational detail was embedded throughout the policy	Dedicated section establishing a clear separation between policy principles and operational procedures, with detailed guidance removed and signposted	Futureproofing and reduced board re-approval burden
3. Legal Context	UK GDPR and DPA 2018 only	Includes DAUA 2025 and updated ICO references	Ensure current statutory compliance
3.2 Definitions	Uses the outdated “sensitive personal data” term	Updated GDPR-aligned definitions, including criminal data	Terminology accuracy and safeguarding robustness
4. Scope	Primarily staff-focused	Expanded to trustees, volunteers, donors, and partners	Reflects real data processing activities
4.2 Personal Data Held	Limited storage examples	Modernised formats, including digital and AV records	Reflects contemporary working practices
5. Responsibilities	General controller statement	Clear Board oversight and CEO accountability	Stronger governance clarity

5.2 Individual Responsibilities	High-level compliance statement	Clear, enforceable individual duties listed	Improves staff understanding and compliance
5.3 Contractors	Covered but fragmented	Consolidated processor and DPA requirements	Improves Article 28 compliance
5.4 Consequences	Criminal and disciplinary consequences noted	Clarified and proportionate consequences	Consistency and fairness
6 Purposes & Lawful Bases	Partial Article 6 coverage	Full lawful bases, including legitimate interests	Legal completeness
6.4 Consent	Limited consent detail	Expanded consent standards and withdrawal rights	Responds to ICO expectations
6.5 Special Category Data	Minimal reference	Detailed Article 9 conditions	Safeguarding and legal robustness
6.7 DPIAs	Brief mention only	Dedicated DPIA section	Risk-based compliance
7 Fairness & Transparency	Embedded throughout policy	Standalone section with clear requirements	Improves transparency compliance
7.1 Privacy Notices	Inconsistent references	Clear content and timing requirements	Lawfulness assurance
7.3 Accountability	Implied compliance	Explicit compliance records listed (ROPA, LIA, DPIA)	ICO-ready evidence of compliance
8 Retention & Data Quality	Operational detail included	Principles retained, procedures signposted	Policy clarity and flexibility
9 Individual Rights	Detailed SAR procedures	Rights summarised with procedural signposting	Keeps policy concise

9.1 Complaints	Combined with FOI detail	Clear complaint and ICO escalation route	Transparency and fairness
10 Security	Highly technical controls included	High-level security principles only	Avoids rapid obsolescence
11 Disclosure & Sharing	Complex FOI-driven detail	Simplified lawful sharing principles	Reduces confusion and risk
11.5 International Transfers	Approval required statement	Clear safeguards and transfer mechanisms	Post-Brexit compliance
12 Implementation	Operational training detail	Governance-focused implementation	Board-level assurance
13 Related Policies	Listed but inconsistently referenced	Updated and aligned list	Clarity and consistency
14 Monitoring & Review	Fixed two-year cycle	Risk- and change-based review triggers	More responsive governance