

Data Protection Policy

UDOIT! Dance Foundation

Last updated	October 2026
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Definitions

Charity	means UDOIT! Dance Foundation, a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Caroline Fallis-Taylor UDOIT CEO
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. Purpose of this Policy

UDOIT Dance Foundation (“the Charity”) is committed to protecting the personal data of children, young people, families, staff, volunteers, partners, and supporters. This policy sets out how we comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Definitions

- **Charity:** UDOIT Dance Foundation, a registered charity in England & Wales.
- **Personal Data:** Any information relating to an identifiable person.
- **Special Category Data:** Sensitive data including health, ethnicity, SEND needs, safeguarding information, and biometric data.
- **Processing:** Any operation performed on personal data.
- **Responsible Person:** Caroline Fallis-Taylor, CEO.
- **Register of Systems:** A record of all systems, platforms, and contexts where personal data is processed.
- **Data Subject:** Any individual whose data we process.

3. Data Protection Principles

The Charity complies with Article 5 UK GDPR. Personal data must be:

1. **Lawful, fair, transparent**
2. **Collected for specific, explicit purposes**
3. **Adequate, relevant, limited**
4. **Accurate and kept up to date**
5. **Stored only as long as necessary**
6. **Secure and protected**

4. Lawful Bases for Processing

We process data under one or more of the following lawful bases:

- **Consent**
- **Contract**
- **Legal obligation**
- **Vital interests**
- **Public task**
- **Legitimate interests**

Special Category Data requires an additional Article 9 condition, typically:

- Explicit consent
- Safeguarding of children and individuals at risk
- Employment and social protection
- Substantial public interest

All lawful bases are recorded in the Register of Systems.

5. Transparency & Privacy Notices

The Charity provides clear privacy notices explaining:

- What data we collect
- Why we collect it
- How long we keep it
- Who we share it with
- Individuals' rights

Privacy notices are provided at point of data collection.

6. Data Subject Rights

Individuals have the right to:

- Access their data
- Rectify inaccurate data
- Request erasure
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent
- Not be subject to automated decision-making

Requests are handled within one month.

7. Data Minimisation & Accuracy

We only collect data necessary for our work. We ensure accuracy by:

- Regularly updating records
- Reviewing participant information
- Ensuring staff follow data entry standards

8. Retention & Archiving

The Charity maintains a Retention Schedule (see below). Data is kept only as long as necessary for legal, safeguarding, or operational reasons.

9. Security Measures

We ensure:

- Password-protected systems
- Role-based access
- Encrypted storage
- Secure cloud platforms
- Safe deletion and destruction
- Regular software updates
- Disaster recovery and backup procedures

10. Data Sharing & Processors

We use third-party processors (e.g., Views, payroll providers, email platforms). All processors must have UK GDPR-compliant contracts.

We do not share data unless:

- Required by law

- Necessary for safeguarding
- Consent has been given
- It is essential for service delivery

11. International Transfers

We only transfer data outside the UK where adequate safeguards exist (e.g., Standard Contractual Clauses).

12. Training & Responsibilities

All staff, trustees, volunteers and relevant contractors must complete data protection, confidentiality and UK GDPR training as part of their induction and undertake refresher training at least annually. Additional role-specific training will be provided where an individual handles special category data, safeguarding information or large volumes of personal data.

Training will cover the practical responsibilities relevant to each role, including:

- Maintaining confidentiality and only accessing or sharing personal data where authorised and necessary
- Recognising personal data and special category data, and applying secure handling, storage, transfer and disposal procedures
- Following the Charity's policies on passwords, devices, email, remote working and clear-desk practices
- Identifying and reporting actual or suspected personal data breaches immediately to the Responsible Person
- Recognising and promptly escalating data subject requests, complaints and confidentiality concerns

Completion of mandatory training will be recorded and monitored by the Responsible Person. Staff and volunteers must confirm that they understand their obligations and must seek advice before processing personal data where they are unsure. Failure to follow this policy or maintain confidentiality may result in access being restricted and, where applicable, disciplinary or other appropriate action.

13. Data Breaches

All breaches must be reported immediately to the Responsible Person. We assess risk and report to the ICO within 72 hours where required.

14. ICO Registration

ICO Registration & Data Protection Fee

UDOIT Dance Foundation has assessed its obligations under the Data Protection (Charges and Information) Regulations 2018 and has determined that the Charity is exempt from paying the ICO data protection fee. This exemption applies because the Charity does not operate CCTV and processes personal data only for core charitable purposes, without commercial activity that would require registration.

Although exempt from registration, the Charity continues to comply fully with the UK GDPR and the Data Protection Act 2018 and follows all relevant ICO guidance.