



**FORWARD
ACTION**

 **movement**

Soft opt-ins: How to grow your list without losing trust

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What's changing

The Data (Use & Access) Bill was passed in 2025 and came into force in February 2026. However, new guidance from the ICO is yet to be published and we strongly advise charities wait for this before using the soft opt-in. This is implied consent to contact people with marketing communications, under certain conditions:

- * They are a registered charity
- * The direct marketing must aim to further the charity's charitable purposes
- * Data was collected in the process of expressing interest in, offering support for, or providing support to the charity
- * Individuals are given a simple way to opt out of marketing emails at the point of sign up, and in each subsequent communication





This brings consent for email and mobile messaging in-line with post and phone for charities.

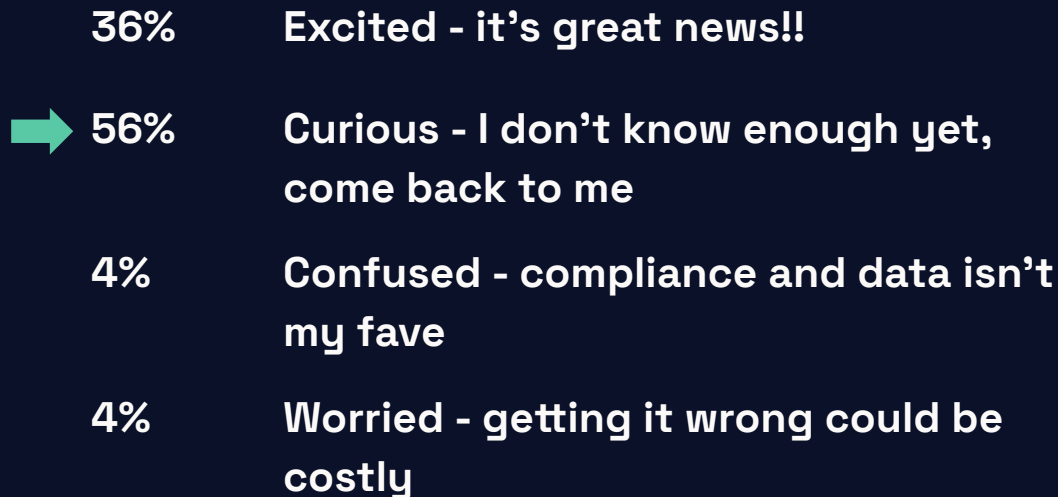
And it brings charities in-line with the commercial sector.

Before		After	
Legitimate interest		Legitimate interest	
Post	✓	Post	✓
Phone	✓	Phone	✓
Email	✗	Email	✓
SMS	✗	SMS	✓

Poll

How are charities feeling about the change to allow soft opt-ins?

Source: 95 webinar participants from across sector, June 2025



Poll

Which soft-opt in implementation plan is your organisation leaning towards at the moment?

22%

Use soft opt-in as the default with opt-out box

14%

Continue with hard opt-in and explicit consent to contact

→ 63%

Use a mix of opt-in types depending on the product or channel

Source: 63 webinar participants from across sector, June 2025



Why this is exciting!

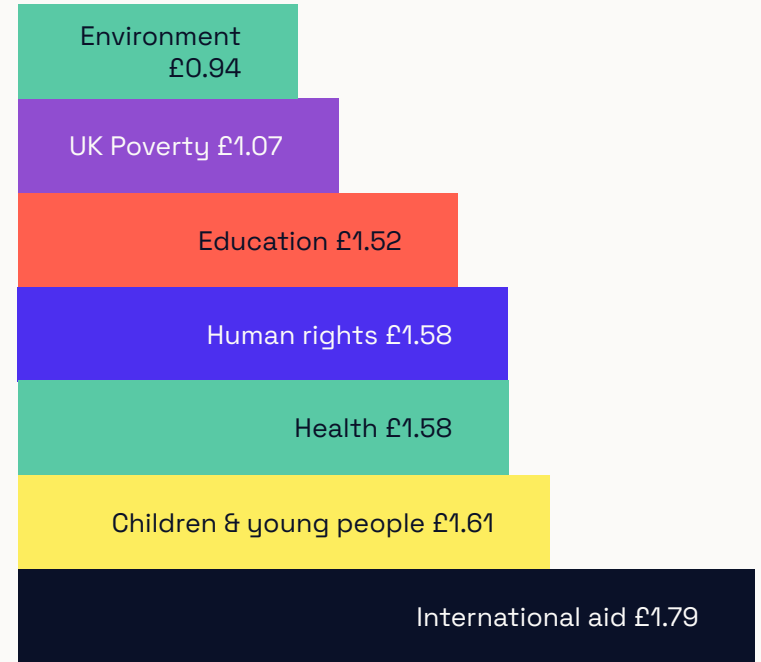
WHY THIS IS
EXCITING

Grow your email and phone subscribers faster and for less

- * If you are running digital attraction programmes using paid social or search, you should get more subscribers per £.
- * These are Forward Action benchmarks for cost per lead across different sectors in 2024, using hard opt-ins for comparison.
- * In a landscape where costs per lead are rising year on year and paid platforms becoming more fractured and volatile, this is good news.



2024 Average cost per email lead: **£1.65**



WHY THIS IS
EXCITING

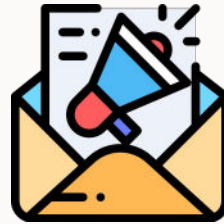
Combine with a strong email
or mobile programme = more
£££, more advocacy, more
impact

- * The Direct Marketing Association estimates charities could raise an additional £290m a year from the additional marketing contacts they will be able to acquire.
- * But it goes further than income. There are so many valuable actions a supporter can take to support your mission, if you are willing to give people a real role to play.



First party data is the future

- * Growing your contactable supporter base should be the foundation of your digital mobilisation programme.
- * These are people you can talk to directly and repeatedly at very low cost, without relying on social platforms or algorithms.
- * Doing this well means always-on attraction across paid and organic social/search, using content rooted in your values. Plus frequent, varied, action-based emails or mobile messages to keep people engaged and active.





Why we need to get it right

If people feel they didn't consent, brand damage is hard to undo

- * The commercial sector has been able to use soft opt-ins for a while. We all know unwanted marketing comms are annoying!
- * Health and finance brands which rely on high levels of consumer trust often choose hard opt-ins for these reasons.
- * See example from Nuffield Health (services enquiry form) which separates comms channels and has explicit opt-ins.
- * Compared with retail brand Boden (online store checkout) which uses a soft-opt in with opt-out on a secondary page.



To continue to receive communications from Nuffield Health about our exclusive offers, products and services, then please tell us how you'd like to be contacted by ticking the relevant boxes below:

Email SMS Phone

On occasion Nuffield Health may contact you with pertinent service information in regards to services we provide. Note that you can either amend or withdraw your consent at any time.

For information about where your personal data may be processed, how it may be processed and for details of our Data Protection Officer, please see our [Privacy Policy](#).

I agree to the [terms and conditions](#) and [privacy policy](#) *

The logo for Boden, featuring the word "BODEN" in a bold, green, sans-serif font, centered within a white rectangular box.

We all would love to update you with exclusive offers, new collections, sales and style inspiration. Your data is important, so we'll always treat it with respect. To read our privacy notice, [click here](#)
[Click here](#) and tick if you would prefer NOT to receive all things Boden and / or you DO NOT want to receive post from our third party retail partners.

By placing your order, you agree to Boden's Privacy Notice and Terms & Conditions (links below)

[< Return to shipping](#)

[Pay now](#)

WHY WE NEED TO
GET IT RIGHT

Deliverability can suffer with unresponsive lists or spam reports

- * Strong deliverability is important. Without good sender reputation, we risk hitting spam filters.
- * Hard opt-ins, or double opt-ins where a confirmation link needs to be clicked can help prevent this.

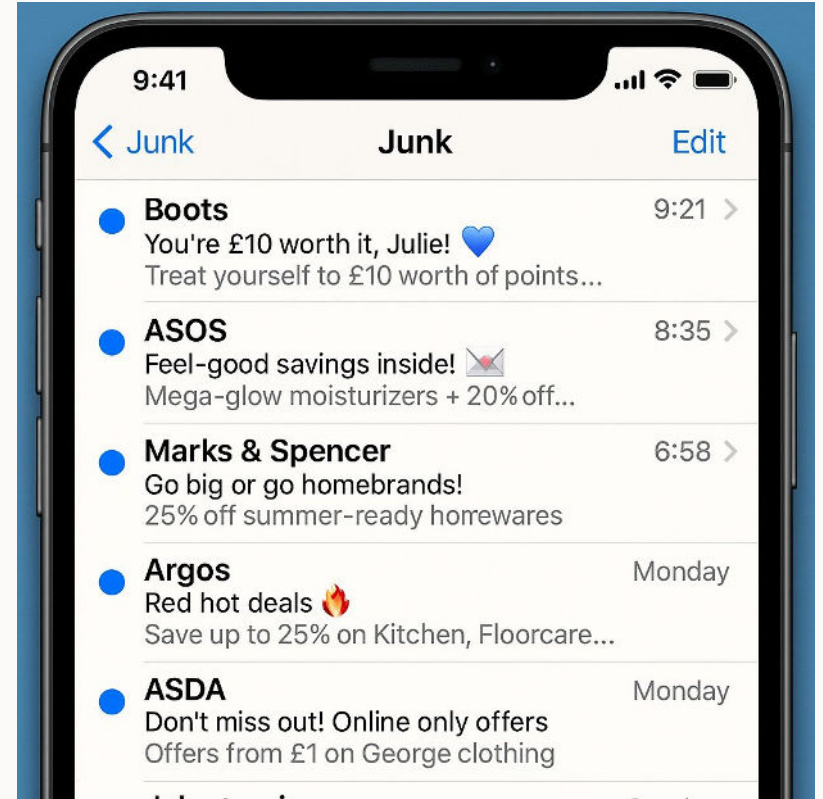


Image is AI generated

We still need to comply with GDPR, even if some rules are changing

- * This change is an amendment to how charities can operate within the existing GDPR framework.
- * You need to offer people a way to unsubscribe at the point of sign-up and in all subsequent communications.
- * Compliance teams need to be involved in changes, with checks to prevent errors.
- * As Papa John's found out, non compliance is expensive and a brand risk.



Papa don't breach: UK data watchdog fines that other pizza place £10,000 over unsolicited marketing blitz

Papa John's falls foul of 'soft opt-in' exemption in PECR rules

[Tim Richardson](#)

Wed 16 Jun 2021 | 12:03 UTC

Pizza takeaway and delivery outfit Papa John's has been fined £10,000 by the UK's data watchdog for sending marketing fluff to punters without their say-so.

Following a year-long investigation, the Information Commissioner's Office (ICO) found that the company had sent 168,022 "nuisance marketing messages to its customers without the valid consent required by law."

One of the unnamed complainants said they had "never [given their] consent for marketing text messages" resulting in "distress."

Another said they had received almost 100 messages in what was described as the "textbook definition of harassment."

If your CRM isn't ready, you could find yourself in data hell

- * You'll need to be able to tag records with the type of opt-in an individual has
- * And be able to segment accordingly
- * Movement is ready to support different consent options, designed by you, for your supporters.



You've got power—own it. Join us and help spark the change only you can make.

Yes

No

Submit

<https://www.yourmovement.org/privacy>



Email and mobile journeys need adapting - or you might not see the benefits of this change

- * Switching to soft opt-ins will mean some people won't realise how they got on to your list. They'll need convincing of the value of your comms, and be less likely to open your email in a crowded inbox.
- * If you want to turn numbers on a database into real world impact, you have to work hard for it.
- * But don't worry: we have lots of experience and ideas on how to do this coming up...





Checklist for success



Are you ready for soft opt-ins?

Your checklist for success

1

Understand the change,
and make a plan



2

Get your CRM ready



3

Update your data capture
forms



4

Enhance supporter
journeys



5

Watch the data



6

Be ready to adjust
your plan



CHECKLIST FOR SUCCESS

1. **Understand the change, and make a plan**
 - * Share resources like this one, or [our webinar on the topic.](#)
 - * Create a project team with reps from compliance, data, supporter facing teams, marketing
 - * Map out your options and agree the plan your org will follow.



CHECKLIST FOR SUCCESS

2. Get your CRM ready

- * Ensure your CRM can distinguish between different types of consent
- * Create a tagging system for different opt-in variants
- * Set up segmentation capabilities based on supporter consent type
- * Test data flows to prevent potential data management issues



The screenshot displays a form builder interface. At the top right, there is a small logo icon. Below it, a section titled 'Opt-in radio' contains a question mark icon and a text input field. Underneath, the 'Opt-in topics' section features four tags: 'Email x', 'SMS x', 'Phone x', and 'Whatsapp x'. The bottom section, titled 'Subscriptions', lists four categories: 'Email', 'Phone', 'SMS', and 'WhatsApp', each with a green toggle switch that has a white checkmark and is currently turned on.

Image: Example of Movement form builder

CHECKLIST FOR SUCCESS

3. Update your data capture forms

- * Audit all your digital and offline points of sign up
- * Make sure digital pages can support different consent options - contact your different platform providers
- * Test new forms to check data flows and tagging works as expected
- * Have clear go-live days, and phase updates if needed, starting with the highest traffic pages

Will you sign the petition to protect them?
85,956 have signed. Help reach 100,000.

First Name*
Last Name*
Email*
Postcode
Phone

* Required

Do you want us to keep you posted?*

Subscribe to our emails to receive updates on how to get involved through petitions, campaigning, volunteering and donating.

Yes
 No

Add my name >

Be first to know when there's a chance make a difference. Sign up for Greenpeace action alerts, straight to your inbox.

Your first name (Required)
Your last name (Required)
Your email address (Required)
Your phone number

Submit

If you sign up, we'll keep you updated on how you can get involved through petitions, campaigning, volunteering and donating. You can opt out at any time. Read our [privacy policy](#).

Make a one off donation

1 AMOUNT > 2 MY DETAILS > 3 MY PAYMENT

Email *

I would like to receive emails from Greenpeace on how to get involved through petitions, campaigning, volunteering and donating.

First Name *

Last Name *

Take your first steps to joining the Greenpeace community today.

First name *
Last name *
Email *
Phone *
Post code *

* Required

By leaving your email address and phone number you are agreeing to hear from us about how you can get involved through volunteering and events. You can opt out at any time. We take the security of your data seriously. Your information is safe and secure with us – read our [privacy policy](#).

Count me in!

Image: Examples of different sign-up forms on Greenpeace UK's website

CHECKLIST FOR SUCCESS

4. Enhance supporter journeys

- * Adapt welcome journeys for soft opt-in supporters
- * In first message, explain why they're receiving the communication, and tailor content to the context they provided data
- * Add extra value in early communications to build trust



Image: Example of Movement welcome journey builder

CHECKLIST FOR SUCCESS

4. Enhance supporter journeys

- * Adapt welcome journeys for soft opt-in supporters
- * In first message, explain why they're receiving the communication, and tailor content to the context they provided data
- * Add extra value in early communications to build trust



Jessica, thank you so much for recently downloading our Climate Crisis eBook.

If you read it to the end, you'll already know one horrifying fact:

People who have done the least to cause the climate crisis are suffering, while the biggest fossil fuel polluters are continuing to fill their pockets.

Shell and BP are some of the worst polluters, but they keep reporting profits running into the billions - all the while drought, floods, storms and wildfires have caused chaos and destruction to people across the world.

Image: Examples of Oxfam GB welcome email after downloading ebook as part of attraction campaign in partnership with Forward Action.

CHECKLIST FOR SUCCESS

4. Enhance supporter journeys

- * Adapt welcome journeys for soft opt-in supporters
- * In first message, explain why they're receiving the communication, and tailor content to the context they provided data
- * Add extra value in early communications to build trust

Image: Example of email providing value in a welcome series from Shannon Trust in partnership with Forward Action.



Hi friend,

Reading and writing are more than just practical skills – they're ways to express yourself, to share your voice with the world. That's exactly what one of our mentors has done in this beautiful poem, which I wanted to share with you today

A Lesson For Life:

When I was at school I just couldn't learn
The teachers all told me that I just wouldn't earn
In the dorms with the boarders, I hated them all
They all took the p'ss, tried to make me look small.

I was trouble it's true but thought they were the fools
My fists did the talking my god given tools
I didn't need knowledge or pencils or books
I was King of my tribe with pecks and good looks.

But I knew in my heart they were right all along
The words of the tune always seem to read wrong
My anger grew stronger, my life was in bits
My saviour was tabs, it was hit after hits.

Why didn't they realise my brain was wired wrong?
That's why I struggled with the words of my song
They call it DYSLEXIA not a word I could spell
Those teachers with knowledge can all go to hell.

I'm now 39 and my life has turned sour
My door is locked up now for hour after hour
The time passes slowly but what can I do
If you don't get no learnin' it can happen to you!

THEN

He offered his hand and gave me a look
If you give me some time I will show you a book
It won't be a doddle it may seem quite tough
There'll be times when you say that "Enough is enough."

The world I will show you I'll try to make fun
It will light up your life just as strong as the sun
I'm happy to show you but your help is a must
I'm your personal MENTOR from the great

SHANNON TRUST

Now for those that can read this I just want to say
Why not share in your fortune and make someone's day?
We're difficult and sometimes we can be hard to handle

BUT REMEMBER

A candle doesn't lose its light when it lights another candle.

**If this poem touched you, will you share it with your friends and family?
It's a powerful way to challenge stereotypes and show why our
community matters so much.**

[Share on Facebook](#)

[Share on Whatsapp](#)

You're part of a community who believe that everyone, regardless of their background, deserves the chance to learn to read. Thanks so much for being with us.

Amy
Shannon Trust Team

5. Watch the data

- * Track and benchmark on-page opt-in/out rates
- * Track and benchmark email/SMS click, action and unsubscribe rates, and spam complaints
- * Compare value of soft opt-in and explicit consent supporters
- * Monitor deliverability scores and inbox placement



Metric	Hard opt-in benchmarks	Soft opt-in benchmarks
Opt-in rate	55-65%	?
Cash fundraising email action rate	0.1% - 0.3%	?
Petition email action rate	5-10%	?
Email unsubscribe rate	0.2-0.4%	?

Forward Action benchmarks for full-list emails where subscribers were recruited using a hard opt-in, for comparison with future soft opt-in benchmarks.

6. Be ready to adjust your plan

- * AB test different framings and UX for opt-in/out statements
- * Optimise welcome journeys by changing content, timings or CTAs of emails/SMS
- * Weigh up all the evidence before making decisions

Image: Examples of variants used in AB opt-in test for Dignity in Dying in partnership with Forward Action. Both are best practice framings, but 'close to winning' proved a strong motivation.



Version A

27% increase in opt in rate

We're so close to winning a new assisted dying law - but we may need to take further campaign actions together. Can we email you updates and vital actions?

- Yes
- No

Are you sure?

If you select 'No', you won't receive any updates on what you can do to help legalise assisted dying. If you select 'Yes', you can still unsubscribe at any time.

Version B

Want to hear about the next big win? Sign up for emails and we'll keep you posted about campaign successes and how you can help. Can we send you updates and vital actions?

- Yes
- No

Are you sure?

If you choose 'No', we can't tell you when we make a breakthrough in the campaign for assisted dying. If you choose 'Yes', you can still unsubscribe at any time.




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Support

If you'd like to chat about how we can help you adapt to these changes, here's how to get in touch.



forwardaction.uk
hello@forwardaction.uk

- * Opt-in best practice
- * Audit & recommendations
- * Blueprint sign-up page tool
- * Multi-platform page builds & edits
- * Testing & optimisation
- * Email strategy & creative



yourmovement.org
hello@yourmovement.org

- * Opt-in best practice
- * Soft opt in ready CRM
- * Action pages, donations and surveys
- * Email, SMS and WhatsApp communication tools
- * A/B testing capability