



## General Data Protection Regulation (GDPR) Guidance for all Ramblers volunteers

### Overview

This guidance is intended for all Ramblers volunteers, but will be particularly relevant for membership secretaries who have an enhanced responsibility to manage members' personal data. It explains what the General Data Protection Regulation (GDPR) is, why it's important, and what volunteers must do to comply with our legal obligations.

The guidance is divided into sections to help you navigate to your role or activity and find out what you need to do.

Ramblers volunteers undertake many different activities, and we may not have covered every scenario. The GDPR is new for everyone, and we expect our guidance will evolve and improve over time, based on conversations with you and drawing on best practice guidelines. Our [General Data Protection Regulation \(GDPR\) toolkit](#) includes all our resources and an FAQ which will be kept up to date, so please refer to this and look out for further communications.

The GDPR is an important and technical piece of legislation – and as a result this guidance is necessarily very detailed and quite complex in areas. In some cases, volunteers may need to adjust how they run their activities, or even do additional work. However, as the GDPR is essentially about strengthening previous data protection legislation, this shouldn't all be completely new. Please remember that the staff team is on hand to provide further guidance and support should you need it.

If you have any questions, concerns or want to talk through a particular issue, please contact the Ramblers data protection officer - [dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk) or 0207 339 8525.



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## 1. The General Data Protection Regulation (GDPR)

### 1.1. What is the General Data Protection Regulation (GDPR)?

The General Data Protection Regulation (GDPR) is a new EU legal framework which comes into force on 25 May 2018. Its purpose is to give individuals more control and protection of their personal data. It introduces new regulations for all organisations that process (collect, manage and use) personal data. As the Ramblers process data, and our volunteers process data on our behalf, we are legally required to comply with the GDPR.

The GDPR outlines the conditions under which data can be processed. These principles are similar to the 1988 Data Protection Act, but more specific. For example, people have to opt-into rather than opt-out of communications. This means there are additional requirements that we now need to follow when we collect, manage and use data.

The new **accountability principle** means there is now greater responsibility on organisations to document how they process and manage personal data. As Ramblers groups and areas process data on behalf of the Ramblers, staff and volunteers need to work together to follow GDPR guidelines to make sure personal data is managed appropriately. Failing to do this may result in the Ramblers being fined.

### 1.2. What data and activities does the GDPR apply to?

#### ● Personal data

The GDPR outlines how personal data can be used. Personal data means any information relating to a living person who can be directly or indirectly identified by that information.

Personal data includes:

- Name (title, first name and surname)
- Postal address (full or partial eg. postcode)
- Email address
- Telephone number (home or mobile)
- Membership number
- Online identifiers (such as IP address)

#### ● Special categories of personal data

The GDPR also governs the use of sensitive personal data, which is now described as **special categories of personal data** - and there are stricter controls regulating the



collection and use of this information. Sensitive personal data includes ethnicity, race, political affiliation, religion, union membership, health, sexual orientation etc.

Area and group volunteers should not be handling special categories or sensitive data at a local level, so should not need to be familiar with these stricter controls. However, there may be some exceptions - for example, Incident Report forms which contain health data - which are addressed later in this guidance.

## ● Data processing

The GDPR, like the Data Protection Act, is about how personal data can be processed. Data processing means:

- Collecting data
- Recording and holding data (electronically or in paper-based filing systems)
- Any activity that uses the personal data (such as organising, adapting, changing, retrieving, consulting, disclosing, erasing or destroying the data).

Examples of data processing at a local group or area level are:

- Using the membership lists to send out your group or area's walk programme
- Filling in an Incident Report form
- Publishing a walks programme which includes walk leaders' names and contact details.

Your group and area will have been following our previous data protection guidance, so although there are some new requirements brought in by the GDPR, it's mainly about enhancing what you are already doing.

## 1.3. The principles of the GDPR

The six principles of the GDPR are:

1. **Lawfulness, fairness and transparency:** Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals.
2. **Purpose limitation:** Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. **Data minimisation:** Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. **Accuracy:** Personal data shall be accurate and, where necessary, kept up to date.



5. **Storage limitation:** Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.
6. **Integrity and confidentiality:** Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

#### 1.4. How the GDPR applies to volunteers - who's responsible?

One of the key changes with the GDPR is the **accountability principle**, which places greater responsibility on organisations to clearly explain and document **why** data is being collected and **how** it is being used.

The Ramblers' data controller (the Head of ICT and Web services) is responsible for determining the purposes for processing data i.e. how and why data is processed.

Ramblers areas and groups are **not** data controllers, and therefore cannot decide the purposes for processing data, and must comply with the Ramblers national policies and guidelines.

We have mapped out key volunteer activities in the "[How to manage personal data](#)" template. If you are handling data in a way that isn't covered in the template, please get in touch with [dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk) to discuss how to proceed.

**Data protection is everybody's responsibility.** As a Ramblers volunteer, you may process data on behalf of the Ramblers. If so, **you** are responsible for looking after other people's data.

- **All volunteers** must be aware of and understand the [6 principles of the GDPR](#) to ensure that any processing of personal data you undertake as part of your volunteering duties is carried out correctly.

If your volunteer role involves managing personal data, you should consult the "How to manage personal data" template in the [General Data Protection Regulation \(GDPR\) toolkit](#) and follow the guidelines for that activity.

If you stop performing a volunteer role, you should inform your area/group membership secretary of any data you have been managing and agree if this should be destroyed or handed over to another volunteer. You **must not** retain any copies of personal data.



- **Membership secretaries** handle local membership data and so must be particularly aware of GDPR regulations. Please see [section 4](#) for more details. Membership secretaries who are stepping down must have a handover process in place - please contact the [dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk) if you need further advice.
- **Chairs** are responsible for the smooth running of their group or area and for ensuring they comply with the Ramblers' legal obligations and organisational policies. In relation to GDPR, they are responsible for ensuring volunteers in their group or area are aware of this GDPR guidance and that someone in their group is nominated to create and maintain the "[Managing personal data](#)" template.

## 2. How the GDPR applies to different types of data

### 2.1. Membership data

The Ramblers collect members' data for the purposes of servicing their membership, and we can contact members in relation to their membership, regardless of their contact permissions. For example, to issue new membership cards or send renewal reminders.

However, if we want to contact members about anything which is not directly related to fulfilling their membership contract – such as member newsletters or fundraising appeals - we can only do so if we have their consent to contact them.

We collect contact preferences and consent for non-member related communications at the point of joining, and members can manage their contact preferences through their web account or by contacting us directly. Details and options for unsubscribing from communications are also included in all communications sent out by central office.

Contact preferences **apply to all** communications from the Ramblers – including those sent by areas and groups.

You may contact your members for the purpose of directly servicing their membership - for example, sending new members a welcome email. However, if you wish to send other communications, such as group newsletters, you may only do so if that member has opted in to receiving communications.

The Ramblers central database contains all members' personal data and contact preferences. Ahead of GDPR, all members will be asked to re-confirm their contact preferences (for email, post and phone). Contact preferences will be included in the membership lists and reports sent to membership secretaries on a weekly and monthly basis.

Please ensure you follow these preferences and – importantly – **do not** contact members



who have opted out of communications. For more details about contacting members, please see [section 5.2](#).

**NB:** To help ensure you are compliant with GDPR, we strongly recommend that you only use the reports and lists provided by central office to manage communications locally. Creating local data sets and lists could create confusion and lead to a data breach.

## 2.2. Non-member data

If you collect personal data, you are responsible for ensuring it is collected, managed and maintained in accordance with the GDPR. We therefore recommend that areas and groups refrain from collecting personal data from non-members.

If your area or group is collecting personal data from non-members, you must obtain consent, record how and when you obtained consent, and document how you are managing the data. To do this, please follow these steps:

- **Remind yourself of the key principles of the GDPR**  
See “How to apply the GDPR in your role” ([section 6](#)).
- **Use a clear, unambiguous consent statement**  
You must be transparent, informative and clear about why you are collecting data and how it will be used.
- **Have a positive opt-in**  
Consent must be informed and freely given. Therefore you cannot assume consent or use “opt-out, pre-ticked” boxes – people must take action and choose to give you consent.
- **Document when and how consent was obtained**  
You must be able to demonstrate that consent has been given. This could be by making a note on the data list, or by securely keeping consent forms.
- **Ensure that data is stored securely and do not keep it longer than needed**  
Please see [section 8](#) for guidance.
- **Document your process in writing**  
Liaise with the volunteer in your group responsible for maintaining the “[Managing personal data](#)” template and make sure your activity is documented.

**NB:** If you are handling non-member data locally, please contact the [dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk) to ensure you are compliant with GDPR.



### 2.3. Children's data (anyone under 18)

The GDPR has very strict rules around how children's data must be managed. Because we do not regularly work with children, the Ramblers does not have the required safeguards in place. It is therefore our policy that we will not collect or process any data from under 18s.

Ramblers' [safeguarding policy](#) states that under 18s may only participate in Ramblers activities if accompanied by a responsible adult. Only the personal data of the adult should be collected, **not** the personal data of the child.

When taking photos, please ensure no individuals under 18 are photographed without explicit consent from their parent or guardian (for more details please see [section 5.11](#)).

### 2.4. Photographs

Photographs of people are a type of personal data and in some cases you may need to collect consent from the people you are photographing. Guidelines differ depending on the purpose of the photograph, how many people are in it and if individuals are identified. Particular care needs to be taken if children are present.

Please see [section 5.11](#) for more details.

## 3. Chairs: your responsibilities

As chairs, you are responsible for the smooth running of your group or area, and for ensuring you comply with the Ramblers' legal obligations and organisational policies. This now includes ensuring your group or area are following this guidance and are compliant with the GDPR.

### 3.1. Document how your group or area manages personal data

The GDPR requires organisations to audit their data processing activities and keep an up-to-date document outlining why and how they manage data. As groups and areas manage personal data on behalf of the Ramblers, we need you to do this too.

We have created a "[Managing personal data](#)" template to help you. This details groups and areas' key activities involving personal data and has guidelines on how the data should be managed.

We suggest that the membership secretary maintains this, but it's up to you and your group or area to identify someone to be responsible for creating and maintaining it.

The "[Managing personal data](#)" template is pre-populated with the key activities your



group or area is likely to be doing and guidance on how to do them. We have outlined an example here:

Information	Example
<p><b>Activity</b> <i>The Ramblers activity that is being done by the group/area.</i></p>	Sending out welcome emails to new members
<p><b>How data is collected</b> <i>How the group/area comes to have the data.</i></p>	On Ramblers central membership database, new members details sent to membership secretary via weekly/monthly membership reports/lists
<p><b>How consent is obtained</b> <i>How the group/area knows that the person has given permission for their personal data to be used for this purpose.</i></p>	When you become a member, you consent to receiving information about your membership
<p><b>How consent is recorded</b> <i>When the individual gave consent, where and how this was recorded.</i></p>	On our central membership database, from which the membership report is generated
<p><b>What personal data is collected</b> <i>What types of personal information is collected.</i></p>	Name, email address, postal address, telephone number
<p><b>Purpose of processing</b> <i>Why the data is being collected and how it's being used.</i></p>	In order to manage an individual's membership
<p><b>How data is stored</b> <i>Where and how data is stored.</i></p>	In spreadsheet and PDFs on membership secretary's home PC/laptop/device
<p><b>What volunteer role is responsible for the data</b> <i>Who is responsible for managing the data.</i></p>	Membership secretary
<p><b>How the data is updated</b> <i>If and how the data is updated.</i></p>	Weekly/monthly, when a new membership report comes through
<p><b>How long the data is stored for</b> <i>How long the data is kept for.</i></p>	1 month until a new membership report is sent



To document how your group or area manages personal data, [download](#) a copy of the template. The instructions are detailed in the first tab. The second tab is a table of activities.

If your group undertakes a particular activity, please make sure you follow the associated guidelines. For example, do not retain old membership lists and reports.

If there are activities that your group or area does involving personal data that aren't listed, please document them by adding a new row and filling in each column and let the data protection officer ([dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk)) know so that we can help ensure you've got the right processes in place and are compliant.

Please ensure your group or area committee regularly review this template and update it without undue delay when there is any change. It should be kept by the chair, secretary or membership secretary as appropriate.

If you have further questions, please get in touch with the data protection officer ([dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk)).

### **3.2. Raise awareness of data protection**

Please make sure the volunteers in your group or area are aware of this guidance and follow the guidelines in the "[Managing personal data](#)" template that relate to their activities.

## **4. Membership secretaries: your responsibilities**

As membership secretaries, you receive regular lists and reports relating to members in your group or area. As you are personally handling sensitive data, you have enhanced responsibilities under the GDPR to manage data securely and safely. It is therefore particularly important that you are aware of good data protection.

### **4.1. Receiving and using membership data**

When you receive membership lists and reports from Ramblers central office, it is your responsibility to:

- **Manage access to the membership lists and reports**

Only the membership secretary should have access to the membership reports and lists which are sent from central office. If other volunteers need to use membership data (for example, to send a group newsletter), the membership secretary must share only the relevant data to enable them to do so. For example, a communications volunteer sending an email newsletter does not need access to postal addresses.

- **Manage mailboxes securely**



Membership secretaries must not use shared mailboxes – this is a high risk practice as it enables multiple people to access all membership data.

- **Securely store membership lists and reports and abide by our retention policy**  
Only one membership report/list at a time should be kept. When you receive new reports and lists, the old reports and lists should be deleted. This will help ensure compliance with the GDPR principles of accuracy and storage limitation. New membership reports/lists will always have the latest and most accurate data. There is no reason to retain old data, as it does not serve a specific purpose. If you wish to track the size of your membership, please retain only the membership count. Personal data is not required for this.

Please see [section 8](#) for more guidance on how to store data securely.

- **Ensure members' data is used appropriately and contact preferences are respected**  
From May 2018, the membership lists and reports sent by central office will include members' contact preferences. You **must** abide by these contact preferences. For example, if a member has opted out of email and postal communications, you may not send them your newsletter.

Contact preferences apply to all communications that are not core to fulfilling membership contracts. For example:

- Sending walk programmes
- Sending newsletters
- Sending combined walk programmes/newsletters
- Sending information about activities your group or area is running, for example socials, walking festivals or events
- Sending details of local campaigns
- Fundraising requests to donate to the Ramblers
- Recruiting volunteers
- Sending annual reports

There may be circumstances when volunteers need to contact a sub-set of individuals because an activity they were involved with has changed or cancelled, for example a planned walk has been cancelled because of snow. Volunteers can contact these individuals, but if an individual requests not to be contacted in this way again, please make a note and respect this in the future.

The following activities are considered core to the fulfilment of membership contracts, and therefore contact preferences do not apply:

- Contacting new members to welcome them
- Sending a one off reminder to existing members to renew their membership



- Sending AGM notices
- **Ensure membership data is only shared with other volunteers to enable delivery of Ramblers activities**

You are responsible for the sharing and use of personal data in your group or area. Therefore, if another volunteer asks for access to membership data, or wants to contact members directly, you must ensure it is a legitimate use of membership data. For example, sending out an AGM notice is legitimate, promoting a fundraising event by another local charity is not.

When sharing membership data with other volunteers, you must only share what is needed. You should also remind the volunteer that:

- they should be familiar with this guidance;
  - they need to respect members' contact preferences;
  - they should destroy the data as soon as their activity is complete.
- 
- **Be an ambassador for good data protection and support other volunteers**

Your role as a membership secretary means that you will likely know more about data protection than other local volunteers. As the primary data handler for your group or area, you may also be asked for data by other volunteers. You therefore have a responsibility to model and ensure good behaviour locally.

Wherever possible, remind fellow volunteers:

- of the importance of data protection;
- that if they are collecting or using any personal data they should consult and follow this guidance;
- that if they are collecting data from non-members, they need to understand the principles of GDPR, have robust and clear processes for collecting and managing the data and ensure the activity is logged in your group/area's "[Managing personal data](#)" template.

Volunteers may also ask you questions – please help as best you can, which will usually involve directing volunteers to this guidance. If you are unsure of the answer, please get in touch with our [dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk).

## 4.2. Updating membership data

A key principle of the GDPR is that data must be accurate, so it's very important that the Ramblers central database is the authoritative record of members' details.

Please do not create, manage or store your own local lists of members and their contact details.

Member data should only be updated by members updating their own centrally held



record via the Ramblers website, or by contacting the membership services team.

This is important for enabling us to manage our data effectively, and ensures all data shared by central office is accurate and up-to-date. If multiple local lists proliferate, it increases the risk of a data breach or incurring fines for poor data management practices.

The quickest and easiest way for members to update their information is by logging into their account on the Ramblers website and changing their details in “My account”.  
<http://www.ramblers.org.uk/my-account>

If they do not have an account, they should be advised to create one.  
<http://www.ramblers.org.uk/my-account>

If they do not have access to the internet, they can call the membership services team on 020 7339 8595. Please note, our **memberships services team can't accept updates from membership secretaries on behalf of a member** – the member must directly get in touch.

## 5. All volunteers: how the GDPR applies to common volunteer activities

Ramblers' volunteers carry out a wide range of activities on behalf of the organisation, which often involve managing individuals' personal data. Below are some of the common activities, along with an overview of what you need to do to ensure you're compliant with the GDPR.

**NB: this is not a comprehensive list – for full details of how to manage data for different activities, please see the “[Managing personal data](#)” template.**

If your activity isn't listed here, or you have more questions, please take a look at our [GDPR FAQ](#).

### 5.1. Using membership reports and lists issues by central office

Membership secretaries receive lists and reports of data for members in your area or group. Membership secretaries are therefore responsible for ensuring that data is collected, managed and used properly within the group or area.

Anyone wishing to contact members locally should liaise with their relevant membership secretary to ensure they have a legitimate reason for contact, and they are following the necessary guidance. Detailed information on accessing and using data to contact members and supporters locally is outlined in [section 4](#).



Please remember that only reports and lists issued by central office should be used as your membership data set. Volunteers **must not** create and keep locally sourced data or lists of members/supporters and their details. It is important that there is one set of authoritative data, otherwise it creates a confusing situation and makes it hard for the Ramblers to be GDPR compliant.

## 5.2. Contacting members

Members tell the Ramblers if and how they want to be contacted – whether by email, phone or post. You **must** abide by these contact preferences. For example, if a member has opted out of email and postal communications, you may not send them your newsletter.

Contact preferences apply to all communications that are not core to fulfilling membership contracts. Group and area membership secretaries are responsible for ensuring any volunteers wishing to communicate with members locally have access to up-to-date data lists and are respecting contact preferences. Please see section 4 for more details.

If you are contacting members, please remember:

- You must use the most recent membership data supplied by central office to the group or area membership secretary to ensure data is accurate.
- You must not contact members who have opted-out.
- Data lists should not be retained past the purpose for which they were obtained.
- You must not keep personal data lists.

### ● **Managing opt-outs and unsubscribes locally**

You must include a clear opt-out option or unsubscribe message in all email or postal communications.

To avoid confusion and ensure that local and national records are consistent, we recommend members are encouraged to update their central record. The following message must be included in all email or postal communications:

*You are receiving this communication as a member of **X area/group** and you have previously asked to be kept informed of the Ramblers work by **email/post**. If you no longer wish to receive communications like this, please update your mailing preferences at <http://www.ramblers.org.uk/my-account>*

If your group or area is using a bulk mailing tool to communicate, you may find there are built in safeguards to improve security. This might mean emails



automatically include an unsubscribe link. This could result in people opting out of communications locally, whilst still remaining opted-in on the central database.

To help us manage our data and avoid breaches, we therefore require you to contact central office with any unsubscribe information you collect, so we can update our central records. More detailed guidance on managing data in bulk mailing tools is available in the [GDPR toolkit](#).

There may be instances where a member is not receiving your communications. If so, let them know that you communicate with those who are opted into Ramblers communications and advise them to update their contact preferences via the Ramblers website or by contacting the membership services team.

There may be instances when a member's record shows they are opted-in to receive communications, but they have directly told you they do not want a particular communication. In this case please advise them to update their central membership record online or by getting in touch with the membership services team, reminding them that this will opt them out of all Ramblers communications. (See [section 4.2](#) on how members can do this).

### ● **Sending bulk emails locally**

We do not currently require volunteers to use a standard tool for email locally, and we know that different areas and groups use different systems. However, we do encourage volunteers to use bulk email tools (for example, MailChimp) as they have safeguards built in to help improve data security. The Ramblers use MailChimp centrally, and we will be adding specific guidance to the GDPR toolkit to help you manage mailing lists effectively in MailChimp.

However, if you are using email systems like Outlook or Gmail which are designed primarily for emailing small groups of peoples, **please remember it's essential** that you:

- Use the **bcc field**, not the cc field, to avoid exposing everyone's email addresses.
- Include text at the bottom explaining how people can be removed from the mailing list (eg. by emailing you and updating their preferences on the Ramblers website).

### **5.3. Contacting non-members**

If you collect personal data, you are responsible for ensuring it is collected, managed and maintained in accordance with the GDPR. We therefore recommend that areas and groups refrain from collecting personal data from non-members.



If your area or group is collecting personal data from non-members, you must obtain consent, record how and when you obtained consent, and document how you are managing the data. Please see [section 2.2](#) for more details.

When communicating with non-members, it is essential that you:

- Can demonstrate their informed consent to contact them.
- Provide an opt-out.
- Respect their preferences if they choose to opt-out.

We strongly recommend that you don't have mailing lists which are a mix of members and non-members. But if you do, please ensure you have consent to contact non-members, and that you abide by members' contact preferences as shown on the lists sent by central office.

#### **5.4. Sending group/area newsletters**

Sending group/ area newsletters is a great way to engage members locally, but it is not considered essential to membership. Therefore newsletters may only be sent to people who have consented to receive communications from the Ramblers. Up-to-date data lists and contact preferences are provided to membership secretaries.

Please see [section 5.2](#) for detailed information on managing mailing preferences and opt-outs locally.

#### **5.5. Sending walks programmes**

Walks programmes are related to an individual's membership. However, as they are sometimes sent out within other types communications (for example newsletters) or may contain other material (for example promotional material about local shops), we ask that you make sure you have consent to send them to members.

Walk programmes should only be sent to individuals who have opted into receiving communications from the Ramblers – this will be shown on the monthly membership reports and lists you receive from central office.

Please see [section 5.2](#) for detailed information on managing mailing preferences and opt-outs locally.

#### **5.6. Working with other volunteers**

Volunteers will often hold personal contact details of other volunteers to enable them to coordinate Ramblers activities locally. For example, a walks programme coordinator



may have a list of walk leaders, or a path maintenance team leader may have a list of volunteers in their parish. All volunteers are responsible for ensuring they keep personal contact details secure and up-to-date (for example, removing individuals if they stop volunteering). Contact lists should be destroyed as soon as they are out of date or no longer needed.

## 5.7. Volunteer recruitment

Only members who have given consent to receive communications from the Ramblers should be contacted with information about volunteering opportunities in your area or group.

## 5.8. Publishing volunteer contact details

You must not share volunteer contact details on any channel – for example in walk programmes or on the Group Walks and Event Manager – unless you have their consent to do so. Before publishing any volunteer contact details, please ask them to complete a “[Publishing volunteer details](#)” form. You only need to do this once, but please keep a copy of the form securely (see [section 8](#) for more advice). You may also want to keep an easy record of who has given consent and when, for example a note alongside your list of walk leaders.

## 5.9. Taking walk registers

If you are taking walk registers, we recommend you use the walk register provided in the [walk leader toolkit](#), which has appropriate GDPR statements on it.

You must not collect walkers’ health information or the personal data of their emergency contacts on walk registers. Please order [In Case of Emergency cards](#) from central office for this purpose.

If you are collecting non-members’ contact details (for example email addresses so you can tell them more about your group and the Ramblers) please follow the guidance in [section 2.2](#).

You must not retain walk registers with personal data on them - please destroy them one month after the walk.

## 5.10. Reporting incidents on walks

If there is an incident on your walk, please complete our Incident Report form and return it within 10 days. Please use the latest version, found in the [walk leader toolkit](#), and **do not keep any copies locally**.



## 5.11. Taking and publishing photographs

Photographs of people are a type of personal data. However, there is not yet detailed guidance about how the GDPR applies to photos. Nevertheless, you should always seek consent before taking or publishing photos. We recommend that in the case of:

- **Staged photos of a group where you gather a group of people together to take a photo (for example, after completing a path maintenance activity, or at the top of a hill during a group walk)**

You must inform the group if the photo will be published and where (for example, your website, social media, a newsletter) and confirm people are willing to be photographed for that purpose.

If you wish to use this photo for commercial or marketing purposes (for example, on a printed leaflet), or identify individuals by name, you will need to be able to demonstrate their consent. The easiest way to do this is by completing a written photo consent form.

However, if you are simply showcasing your group/areas's activity on your group/area's website, social media, newsletter (online or print), and you don't identify people by name or share other personal data, you do not need their written consent.

- **Candid photos of a group taken when people weren't aware and aren't easily identifiable (for example, a group walking along the coast in the distance).**

If you wish to use this photo for commercial or marketing purposes (for example, on a printed leaflet), or identify individuals by name, you will need to be able to demonstrate their consent. The easiest way to do this is by completing a written photo consent form.

However, if you are simply showcasing your group/areas's activity on your group/area's website, social media, newsletter (online or print), and you don't identify people by name or share other personal data, you do not need their written consent.

- **Photos of one or two people where the individuals are the main focus of the photo and identifiable**

You must inform the person/people if the photo will be published and where (for example, your website, social media, a newsletter) and confirm they are willing to be photographed for that purpose.

If you wish to publish the photo in any way (for example, your website, newsletter,



social media or printed materials), you will need to be able to demonstrate their consent. The easiest way to do this is by completing a written photo consent form.

### ● Photos of children

You must not take photos of children unless their parent or legal guardian has given explicit permission. If you wish to publish the photo in any way (for example, your website, newsletter, social media or printed materials), you also need to have the consent of their parent or legal guardian. The easiest way to do this is by completing a written photo consent form.

**NB. We will update this guidance and associated consent forms as further information becomes available.** Please look out for further communications.

## 5.12. Websites

If you manage a website for your area or group, you must include a link to our [privacy policy](#) (due to be updated shortly).

If you collect personal data, you are responsible for ensuring it is collected, managed and maintained in accordance with the GDPR. We therefore recommend that areas and groups refrain from collecting personal data locally. If you collect personal details through your website (for example, through a login so only members can see some content, or a newsletter sign up), follow the guidelines in [section 2.2](#) to ensure informed, opt-in consent.

If you have any specific concerns or questions, please get in touch with the data protection officer ([dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk)).

## 5.13. Booking holidays and coach trips

When you start to organise a holiday, consider what data will be required (only collect the minimum), and confirm if any third parties will require people's data (for example, a travel company). When you collect data you must inform people how it will be used and ensure you have consent for it to be passed on as required. For example: "I am collecting your name, postal address and email and will be passing it to [name of company] so that they can book this holiday. Please confirm that you are happy for me to pass on your details. If you have any questions, please get in touch with [volunteer name]".

You must not retain this data – it should be destroyed no later than one month after the holiday.

## 5.14. Booking training and events



If you are using a third party website, such as Eventbrite to book training and events, this will generate lists of personal data (eg. email address, name). You may use this data for the purposes of administering the event. The event and all associated data must be deleted once the event has passed and it is no longer needed. Data may not be extracted for any other purpose or use not directly related to the event.

### 5.15. Publishing committee/AGM minutes

We recommend that names and contact details are redacted from published minutes. You may choose to use a volunteer role rather than personal details – for example ‘the area chair’, ‘the footpath secretary’. Alternatively, at the end of your meeting, make sure you say where the minutes will be published and record in the minutes that attendees consented / make adjustments if people don’t wish their details to be published.

### 5.16. Historical collections of data

If your group has historical collections of data - for example, records of people that have walked with you, records of attendance at training events etc - please contact [dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk) to discuss how best to manage it.

## 6. All volunteers: how to apply the GDPR in your role

**Data protection is everybody’s responsibility.** As a Ramblers volunteer, you may process data on behalf of the Ramblers. If so, **you** are responsible for looking after other people’s data.

If you are undertaking an activity on behalf of the Ramblers which involves managing personal data, you should consult the “How to manage personal data” template in the [General Data Protection Regulation \(GDPR\) toolkit](#) and follow the guidelines.

You must also be aware of and understand the 6 principles of the GDPR so that if you need to process personal data as part of your volunteering duties, you know how to do so safely and legally. Not all principles will apply to every situation, but they will help you handle data carefully and appropriately.

The 6 principles of the GDPR are:

- **Lawfulness, fairness and transparency: Personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals.**

The key thing here is consent – if you collect personal data you must clearly state why it is being collected, how it will be used, and you must record if consent was given. Similarly, when you’re using people’s personal data you must ensure you do so fairly,



for example respecting mailings preferences.

- **Purpose limitation:** *Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.*

You may only collect personal data if you have a clear purpose for doing so, and you may not use the data for anything other than the purpose you have stated. For example, if you obtain an individual's contact details for the purpose of arranging a holiday they are coming on, you may not add them to your local newsletter mailing list.

- **Data minimisation:** *Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.*

You must not collect more personal data than you need. For example, if you're arranging a holiday, you might just need name and contact details. Do not collect further data "just in case", like date of birth or gender, if you don't need it for your purpose.

- **Accuracy:** *Personal data shall be accurate and, where necessary, kept up to date.*

Will you be using this data on an ongoing basis? If so, how will you keep it accurate? For example, if you're a path team leader and maintain a list of path team volunteers, it would be good to check every 6 months that people still want to be on the list and their details are correct. And if someone asks to be removed, you should do that as soon as possible.

- **Storage limitation:** *Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.*

Data should not be kept longer than needed. The "[Managing personal data](#)" template should cover most activities and outline how long data should be kept for.

- **Integrity and confidentiality:** *Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.*

You must be careful when managing personal data. For example, do not access personal data on a shared computer in a public library; do not store personal data on more devices than necessary; do not leave printed copies lying around. Do keep your personal devices as secure as possible (see [section 8](#) for more guidance).

If you are unsure about how you should be managing personal data as part of your role,



please contact [dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk).

## 7. Subject access requests

Under the GDPR, individuals can request to see their data. This is called a “subject access request”. If you receive one of these, please do not respond, but notify the Ramblers data protection officer ([dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk)) within 24 hours who will advise on next steps.

## 8. Keeping data safe and secure

### 8.1. Electronic data

Keeping your personal devices secure is one of the best ways to safeguard personal data stored electronically. Here are some simple things to remember to keep your electronic devices, and all the data on them, safe:

- **Establish strong passwords and/or passcodes** for all your electronic devices (laptops, personal computers, tablets and smartphones). Where possible, make sure you use a combination of letters and numbers for a hard-to-crack password.
- **Keep laptops secure** by using a username and a unique password. Make sure to never leave your laptop or any device where it is at the risk of being stolen or compromised, for example in a car.
- **Use antivirus protection and anti-malware software.** These serve as the last line of defence against unwanted attack through your network.
- **Update your computer programmes regularly.** Data security is enhanced with every update. Frequently updating your programs keeps you up-to-date on any recent issues or holes that manufacturers and programmers have fixed.
- **Enable your device to lock after a short period of time.** Most devices do this automatically, so after a set time devices “lock”. This is useful so that your devices are protected if you have to leave your screen for any period.
- **Avoid using public PCs or laptops** for official use as in most cases you are unable to verify the level of anti-virus or online security on the devices.

### 8.2. Paper documents

We recommend that you do not print out personal data or keep paper copies of data, as this is the least secure way to manage data. However, sometimes you may need to.



In this case, make sure all physical copies are kept carefully and securely to avoid them being seen or used by unauthorised people, stolen, tampered with or used for alternative purposes by any third party. To do this, keep data together in a file and ideally out of sight when not in use – for example in a drawer. As soon as the data is no longer needed, securely destroy the data by shredding.

## 9. Disposal of data

Storing and archiving data is considered ‘processing’ of personal data, even if the data is not used or updated. Therefore to comply with GDPR, personal data must be securely disposed of when it is no longer needed.

### 9.1. Electronic data

Electronic data must be completely deleted when it’s no longer needed.

If deleting data within a file, delete the data from the file, and then re-save the file. If deleting a whole file containing data, delete the file and then go to the Recycling Bin on your computer and delete the file from there too.

Any CDs and/or DVDs containing personal data must be cut up or crushed before being thrown away.

When disposing of old equipment (such as PCs), please be mindful of data security. Some retailers, such as the larger Currys PC World stores, offer a secure data wiping service for around £35. For those without access to a high street store there is software available online that will overwrite the entire hard drive to remove the data – see <https://dban.org/>. Devices that don’t have removable storage media, such as mobile phones, usually come with a function called something along the lines of ‘Restore to factory settings’ to wipe the data.

### 9.2. Paper documents

Paper documents should be shredded and put in the bin (not recycling) or disposed of using suitable confidential waste facilities.

## 10. Security breaches

A data security breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. Examples of data breaches include:

- Mobile devices, briefcases and bags stolen from vehicles.



- A website with personal data being hacked.
- Documents with personal data missing after being left unattended.
- Used computers or mobile devices sold without first destroying personal data.
- Lost, unencrypted memory sticks and drives containing sensitive information.

If a breach has occurred, or you are worried one might have, please notify the Ramblers data protection officer ([dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk)) within 24 hours who will advise on next steps.

## 11. Training and further support

We are aware that this is a complex area, and extra training and support may be useful. We will inform you of training opportunities and further guidance and it becomes available. Please look out for further communications.

In the meantime, you can:

- Look through our FAQ in the [GDPR toolkit](#) which we are regularly updating.
- See if there is a [Ramblers Roadshow](#) happening near you and come along to a GDPR workshop.

If you need further help, have questions or concerns, please get in touch with the Ramblers data protection officer ([dataprotectionofficer@ramblers.org.uk](mailto:dataprotectionofficer@ramblers.org.uk)) or 0207 339 8525.

