

## **Data Protection Guidance for**

### **Volunteers** *Last update 26/11/17*

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#### **Introduction**

Area and Group volunteers process and work with personal data to perform a variety of Ramblers activities. This factsheet has been produced as a guide to Volunteers to ensure that Ramblers complies with current Data Protection legislation.

##### **1. Why is data protection important?**

All public and private organisations are legally obliged to protect any personal information they hold. This fact sheet provides guidance to areas and groups who work with members' personal data. Personal data includes names and contact details.

The information in this factsheet is derived based on the requirements of the Data Protection Act 1998, the Privacy and Electronic Communication (EC Directive) Regulations 2003 and guidance issued by the Information Commissioners Office.

##### **2. How does it apply to volunteers?**

As part of the Ramblers all areas and groups need to comply with the requirements of the legislation.

The Head of ICT & Web services at Central Office is the Data Controller as defined by the Data Protection Act for the Ramblers as a whole.

Area/Group Membership Secretaries are the Data controllers at Area and Group levels.

Data Protection legislation requires organisations to take care over the personal information that they hold on individuals and to use it only for relevant communication.

Broadly, the Act covers any information that relates to living individuals which is held on a computer. For example, this may include information such as name, address, date of birth and opinions about the individual or any other information from which the individual can be identified.

### **3. What volunteers need to do?**

Volunteers, particularly Membership secretaries, are responsible for ensuring that any personal data is processed in accordance with the principles of the Data Protection Act.

Where an issue arises with respect to data protection volunteers should follow the advice provided on these pages.

#### **a) Fairly and lawfully processed**

The Data Protection Act requires organisations to ensure that all personal data received from members is processed fairly and lawfully and that you are open and honest about the reasons for obtaining the personal data.

In practice, this means that you must be clear why you are collecting personal data and what you intend to do with it.

Personal data is collected from members through the membership processes at Central Office. All members are advised of the privacy statement when joining. The privacy notice ensures that members give their consent to the processing of personal data for the purposes specified. Members are also asked their preference in how they wish to be contacted.

Membership data may be used for:

- I. Managing membership status and subscriptions
- II. Providing effective and appropriate membership services
- III. Communicating with members with regard to organisational issues
- IV. Undertaking research e.g. to ensure services and membership benefits are tailored effectively to members needs
- V. Promoting Rambler's events and campaigns
- VI. For Ramblers Groups to arrange holidays with their members

## **b) Processed for specified purposes**

Areas or Groups must never pass on information about members to other individuals or organisations without explicit consent being obtained. Examples of this may include: a local charity wishing to get in touch with our members in the hope that it may recruit individuals for a sponsored walk or other event. It may also be a local business such as an outdoor shop looking to send advertising information out. Or in the instance of arranging a holiday, it may be a travel company that needs to know traveller's personal details for booking purposes.

Under no circumstances should Areas or Groups pass on any personal data relating to members or prospective members to third parties without explicit consent being obtained.

## **c) Adequate, relevant and not excessive**

Only data needed for the specific purpose should be asked for or recorded. Information that is not relevant for the purpose must not be collected simply because it might be useful in the future.

## **d) Accurate and, where necessary, kept up to date**

Rambler's central office maintains a central database of information about members. This information is updated daily. All members who wish to notify the Ramblers of a change in their contact details are asked to do so directly by contacting the Membership Services team or logging in via the web site.

Membership secretaries should also notify the Membership team of any changes to member's personal details.

Individual Areas and Groups receive weekly and monthly updates about members every month. On receipt of any updated information, Areas and Groups should discard previous records and replace them with the new information where appropriate.

It is important that you regularly delete/ destroy inaccurate and out-of-date information, and correct inaccurate records.

## **e) Not kept for longer than is necessary**

It is important that appropriate data retention periods are defined and adhered to.

In essence data should not be retained for any longer than is necessary to fulfil the reason it was collected.

## **f) Processed in line with the rights of the individual**

There are some cases where Areas and Groups wish to store information about their members that is not recorded on the central database.

Typical examples may include a local list of members who wish to be contacted about specific walks or who are going on a holiday.

This is fine so long as the activity fits with the specified purposes outlined previously.

### **g) Kept secure**

In all cases great care must be taken to secure and maintain any personal data held.

Volunteers processing data must ensure that:

- i. Access to laptops/computers where personal data is stored is restricted to authorised users.
- ii. Any passwords provided by Central Office are kept secure and not shared with other people.
- iii. Computers/laptops containing personal data should always be stored securely – i.e. not left in a vehicle overnight
- iv. Area/Group websites used to collect and store personal data have appropriate security policies in place and are updated with the latest security patches.

### **h) Not transferred to countries outside the European Economic Area unless the information is adequately protected.**

If you are using bulk email tools or storing data on websites it is possible that the servers are located outside of the European Economic Area. It is recommended that you only use services provided by company who host data within the UK or have signed the appropriate safe harbor agreements or privacy shield agreements. see <https://ico.org.uk/for-organisations/guide-to-data-protection/principle-8-international/>

## **4. Reporting Incidents & requests for data disclosures**

All requests for data subject access requests should be referred to [paul.strong@ramblers.org.uk](mailto:paul.strong@ramblers.org.uk)

Data protection breach e.g. loss, theft or unauthorized access to personal details must be reported to [paul.strong@ramblers.org.uk](mailto:paul.strong@ramblers.org.uk) - please supply the following details

Incident details to provide:

- Your name
- Your contact details
- Was the personal information lost, stolen or accessed by un-authorized individual(s). Please provide details.
- Please provide details of the type of personal information and number of records involved.
- The circumstances of the loss/theft/access
- Action taken to minimise / mitigate effect on individuals involved including whether they have been informed
- Details of how the breach is being investigated
- Whether any other regulatory body has been informed and their response
- Remedial action taken to prevent future occurrence and any other information you feel may assist Ramblers in making an assessment on how the matter will be followed up

## **5. Definitions**

- Data: is recorded information, whether stored electronically on computer or in paper based filing systems.
- Personal: means that the information is about an identifiable living individual.
- Personal data can be factual, such as a name, address or date of birth, or it can be an opinion, such as how a manager thinks an employee has performed at an appraisal. It can even include a simple email address.
- Processing: is any activity that involves the data. This includes collecting, recording or retrieving the data, or doing work on the data such as organising, adapting, changing, erasing or destroying it.
- Sensitive personal data: includes information about someone's racial or ethnic origin, political opinions, and religious or other beliefs, trade-union membership, health, sexuality, or criminal proceedings or convictions. Sensitive personal data can only be processed under strict conditions. In most cases, this means getting permission from the person the information is about. They decide how and why the information is used. As data controllers, employers have a responsibility to establish workplace practices and policies that are in line with the act.
- Data users: include employees and volunteers whose work involves processing personal information. As a data user, you have a legal duty to protect the information you handle. You must follow your employer's data protection and security policies at all times.
- Data subjects: are the people the information is about. Within the Ramblers, they may be current members or people applying for volunteer roles. Data subjects might also be customers, suppliers, clients, patients or other people about whom information is held. All data subjects have certain legal rights in relation to their personal information.
- Data processors: may be separate organisations that process information on behalf of data controllers. They must also follow the act and make sure information is handled properly.