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General GDPR FAQs

What do we need to do to ensure we're meeting the new data protection regulations?

1. Read through the Walking for Health guidance on GDPR, particularly focus of the GDPR overview and general FAQs.
2. Understand how the new Walker Registration Form works, the consents required to contact walkers in the future and how it should be used by your scheme and volunteers.
3. Ensure you have switched over to using the new registration form by 25 May. All copies of the old form require the data uploading to the database by 24 May. Ensure all versions of the old registration form are destroyed by 25 May, whether they have been uploaded to the database or not.
4. If you're a Walking for Health database scheme, review and complete the data sharing agreement. This will need to be undertaken by 1 July.
5. Understand whether you need to regain consent from your existing walkers in order to continue contacting them for purposes other than walk administration.
6. Ensure that someone in your scheme is responsible for creating and maintaining the pre-populated "Managing personal data" template, and start documenting anything that isn't already captured.
7. Raise awareness of GDPR and the guidance we have provided with volunteers in your scheme
8. Look out for updated training information. We are currently updating our training guidance and resources and will let you and cascade trainers when this is available

For further information about meeting these requirements, please consult the rest of our guidance. If you still have any queries, please get in touch you're your short group walk scheme officer or walkingforhealth@ramblers.org.uk / 0207 339 8541.

The new data protection regulation states that 16 year olds don't need their parents to give consent to organisations for holding their data – why is the age 18 for Walking for Health participants?

The regulation does state that 16 year olds can provide their own consent to their personal information being recorded. However, in-line with the national Walking for Health guidelines on safeguarding, we state that only those who are 18 years and over fill in a Walker Registration Form.

We need to hand our scheme over to a new organisation – are we able to transfer the walkers' information to them?

If your scheme is changing the lead organisation, please let us know as soon as possible. You will not be able to transfer personal data to the new scheme. The walker will need to sign up with that specific scheme, using the new walker's registration form.

How do I respond to a subject access requests?

Subject Access Requests (SAR) should be referred back to the Data Controller through alerting the Data Protection Officer to any SAR that you might receive. Ramblers walking for Health anticipate new procedures and mechanisms for handling SAR will be developed over the coming weeks.

What do we need to do in the event of a breach of personal data?

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data. The GDPR introduces a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority, which in the UK is the Information Commissioners Office (ICO).

In the event of a breach, you need to contact the Ramblers immediately. The Ramblers has an obligation to notify the ICO within 72 hours, so we need notification from the scheme as soon as possible.

The key pieces of information that need to be provided are:

- What has happened, e.g. were a number of Walker Registration Forms lost or stolen?
- When and how you became aware about the breach,
- the people that have been or may be affected by the breach – if you have the walk register, it should be clear which walkers are affected, and
- who else is aware of the issue?

The Walking for Health team can be contacted via 0207 339 8541. If there is no one to take your call, the Ramblers reception can be contacted via 020 7339 8500. If you do need to call, please be clear that you are reporting a data breach on a Walking for Health walk.

Who is potentially liable for fines under the new data protection regulation?

The General Data Protection Regulation introduces additional regulations for all organisations that process (collect, manage and use) personal data. Both the Ramblers and local schemes process data under the Walking for Health programme and are legally required to comply with GDPR.

Walker registration form

What shall I do with our existing paper forms?

You will still be able to upload information from the current walker registration form until 5pm on the 23rd May – when the option to add a walkers' health data to the database will be removed. Please ensure that all of the old walker registration forms are destroyed by **25th May**.

Many of our walkers don't have an email address, will we lose data?

We would encourage you to work with us on this. It is important that walk leaders understand that the data about walkers, collected anonymously through the survey is used to enable us to monitor and report to funders on the programme. Walk leaders can help by explaining this to new walkers and handing them the survey form to complete.

We'd prefer not to email walkers the health survey, and just give them paper forms, is this allowed?

Yes, this is fine – as long as you ensure that the information is uploaded to Survey Monkey, using the link provided in our guidance document. The anonymised forms can then be destroyed.

What happens if a walker does not tick the box to say that they walk at their own risk and will seek medical advice if appropriate?

Unfortunately this is a requirement of all new walkers. If they do not tick this box to accept this condition then they should not walk with the group.

My scheme doesn't use the database but we use paper forms to gather health data from walkers. What are my options for continuing to collect health data from my walkers?

You are welcome to start using the Walking for Health database, and your walkers will automatically be emailed the health survey link.

Alternatively, you could create your own anonymous survey and send this to your walkers, and provide us with the aggregated data when required

We don't use your database, can we use your walker registration form or should we have our own?

You can still use our new form even if your scheme doesn't use the database.

We use our own walker registration form and based this on your minimum data requirements guidance. Have these minimum requirements now changed? Should we change our walker registration form to match to the questions on the new form?

No, the minimum data requirements have not changed and still apply to accredited schemes.

We ask some different questions in addition to the minimum data requirements for Walking for Health because of how our scheme is funded and we have to report on these to our funders. Are we still ok to ask these questions?

Yes.

How should we securely destroy the paper forms?

Disposing 'securely' means getting rid of the walker registration form so that it can't be put back together again by someone determined to steal a walker's identity. You can do this by shredding (preferably using a cross-cut shredder), or you can treat them as confidential waste and place in specially-labelled security waste sacks in your workplace. If these methods aren't possible, tearing them into small pieces is also an option.

How long should we keep the paper forms?

Once the information has been entered onto the database, the forms should be destroyed immediately. The purpose of collecting the information on the forms is only for monitoring and gaining consent to be contacted – there is no need to keep this information in another format once it's been entered.

For the same reason, digital copies of the forms shouldn't be stored separately either. As above, because there is no purpose to do this, in line with the principle of data minimisation, this data shouldn't be stored outside the database.

In general, the fact that the details have been added to the database is evidence that the walker has been provided with the information and seen the form.

The registration forms are not an obligatory part of our insurance cover – walkers don't have to complete walker registration forms, but they're asked to complete them as a matter of good practice. This was taken into account when our insurers quoted our terms and accepted our risk. We therefore do not need to produce evidence of the signed forms as part of an insurance claim.

How do we ensure forms are handled securely by leaders before they are passed to data inputters? What advice should we give leaders; can you give us a good practice example that could be put into place for our scheme?

It is very important that you ensure that you are storing any personal data safely and securely at all times. We would advise that walk leaders hand over any forms from the walk immediately to the assigned database administrator after the walk without undue delay, to ensure that there are no back logs of paper forms. Once these forms have been input on to the database they should be immediately destroyed. Please see our walk leader guidance, which you can download [here](#).

Our walk leaders use the health questions on the current Walker Registration form to know about walkers' health conditions. How will we know this information in the future?

Your scheme should no longer use sensitive personal data in this way. The new walker registration allows walkers to indicate their suitability for the walk by consenting to the following statement: *"Please tick here to confirm you understand you take part at your own risk and will seek medical advice if appropriate"*

Sensitive personal data should not be used as a means of screening walkers and determining their suitability for walks.

Should we share the health conditions of the walkers with our volunteers?

Schemes should not share any health conditions of walkers with volunteers. This isn't the purpose that this information is recorded for, and health information is classified as sensitive personal information which means stronger rules govern its use. Some volunteers may want to know the health conditions of walkers for their safety during the walk, but it is the responsibility of the walker to disclose anything important. At the start of the walk, volunteers can pass around ICE (In Case of Emergency) cards which the walkers can record any medical conditions on. Volunteers should also remind walkers to let them know if their health has changed.

Walker consent

Our scheme doesn't have consent to contact a list of walkers. Can we still store their personal data?

As your scheme is providing a service that walkers use, we believe you have a legitimate interest in storing their information. However you must keep their information secure, treat it as though it is your own, and not keep it for longer than necessary.

Are we able to use our own contact lists, or do we need to use the Walking for Health database to store our walkers' personal data?

The Walking for Health database provides a way for your scheme to manage and store your walkers' data securely. However, if you'd prefer to use an external contact list (for instance a spreadsheet, an email campaign management tool such as Mailchimp, or as a list in an email provider) you need to make sure it's kept secure and is GDPR compliant.

We send a monthly walks programme/newsletter to all our walkers – can we still do this?

Yes, we believe there is a legitimate interest in you a scheme contacting walker about your walks programme.

We contact walkers in advance if a walk is cancelled, can we still do this?

If you expect that walkers might turn up to a walk that has been cancelled, you have a legitimate reason to contact them without having their explicit consent. In this example, you should only contact walkers who you believe are affected by the cancelled walk, and do not contact any walkers who have not taken part in your walks for a long time, or who have never attended the affected walks.

We'd like to email walkers to recruit new volunteers, can we still do this?

This does not count as legitimate interest, so you would need to ensure you have the correct consent to email your walkers about this. Check the 6 steps in the consent guidance document to ensure you have consent.

We want to send emails/letters to walkers about our walk programme – can we do this?

Many walkers do want to receive information from their local health walk scheme, but it's essential to ensure that only those who have given consent do receive anything. Once their details have been entered onto the Walking for Health database, the mail merge report allows you to access a list of their contact details in a spreadsheet. This list will specify what each walker has consented to, so please take care over which ones are included. Once the communication has been sent, delete the spreadsheet without undue delay (storing the list for no longer than one day would be reasonable unless there was a specific reason to store it for longer). Deleting the spreadsheet is important because it prevents copies of personal information being stored outside the database which should be treated as the master list.

Contacting volunteers

I email my volunteers their monthly/quarterly walk rota – can I still do this?

Yes – as this directly relates to their agreed role with your scheme, you would still be able to do this without having their explicit consent. However it's always best and more secure to ensure you're collecting consent.

My volunteers share their contact information between themselves so that they can help each other with covering shifts, are they still able to do this?

Yes – volunteers can share their information amongst each other, provided they understand it is for that purpose.

We share the contact details of volunteers among them so they can contact each other about the walks – are we able to do this?

Allowing volunteer walk leaders to contact each other to make arrangements can be helpful, especially if you run a very large scheme. Sharing contact details among leaders can be done as long as they are aware how their information will be used from when they start in their role. It would also be recommended to periodically provide updated lists of current volunteers, so that any who are no longer volunteering can be removed.

Sometimes our walkers and volunteers contact each other on an informal basis – are they allowed to do so?

Walkers and volunteers are free to share their contact details with each other, but this must be agreed amongst themselves without relying on the information recorded on the form itself.

Images and media

We sometimes take photos of people on our walks, can we publish them?

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 scheme's activity on your 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 scheme's activity on your 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 are 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, on 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, on 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.

Some of our walkers and volunteers are friends – can they still email each other, take photos etc?

Yes, of course. The main thing to remember is if you're doing a volunteer activity on behalf of Ramblers Walking for Health, for example sending out a newsletter or taking a photo for your Ramblers group Facebook page, then you need to follow our GDPR guidelines.

Health Survey / Database

Can we share anonymous statistics on our participants to local funders and other partners?

Yes. The new data protection regulations only cover identifiable personal information, i.e. information that can be used to identify someone, or information that could be combined with other data to identify someone. This means that anonymous data, such as statistics on the numbers of those with different health conditions, age ranges, ethnicities and so on, can be shared.

If you are changing the health questions how will we compare data sets from walkers who answered the old question to those who answer the new questions?

We are not changing the health questions. We will be capturing the same information through a new survey form. We will share the reports with your scheme, and will explain how it can be related back to previously stored information on the database.

My scheme doesn't use the Walking for Health database, am I able to carry on holding an alternative list of attendees?

Yes but you are responsible for the processing of that data under GDPR

My scheme currently doesn't use the Walking for Health database, but we'd like to start now! Can we?

Yes. Please contact walkingforhealth@ramblers.org.uk.

Will we still have to report annual figures to Ramblers Walking for Health and if so are we ok to share that information with you?

Yes. Please see our minimum data policy guidelines.

Who is responsible for the data once inputted to the Walking for Health database, will this change?

Walkers' personal data will be shared between the Ramblers and the local schemes on a joint basis with each being a data controller in their own right and for the purposes of the Walking for Health programme acting as data controllers in common.

How many people have access to the personal data on the Walking for Health database?

The following staff members have access to the Ramblers Walking for Health database:

- Head of ICT manager;
- National Short Group Walks Team

What personal data do they have access to exactly?

Walker Name, Address, Email, phone, Postcode

Would there be training for volunteers and how they should handle the data?

We will determine the response to the guidance provided before deciding whether additional training is required.

Will I need to purchase a particular type of storage i.e. lockable cabinet?

No. Forms should be destroyed as soon as they have fulfilled purposes.

If data from was lost who would be responsible for this, the council or Walking for Health?

If the data is lost from the Ramblers Walking for Health database, we will both share responsibility and help each other with regards to any investigation by ICO. If the data is lost from a scheme's own database it will be the responsibility of the host organisation.