
GDPR: Overview for Walking for Health schemes and volunteers

This document provides Walking for Health schemes and volunteers with a quick overview of GDPR and your responsibilities.

The General Data Protection Regulation (GDPR) is a new EU legal framework which will come into effect on 25 May 2018 and 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. The Ramblers intention is to ensure that they and local schemes do everything required to protect participant's personal information in the Walking for Health programme and to work together to achieve this. Please see our detailed legal guidance note on how The Ramblers and local scheme need to work together for GDPR compliance, and what actions need to be taken. Here is a summary of the key GDPR principles you should be aware of:

Personal data

GDPR applies to personal data, which is any information relating to a living person who can be directly or indirectly identified by that information. This includes name, postal address, email address and telephone number.

Who is responsible for managing personal data?

Data protection is everyone's responsibility. If you process data on behalf of Walking for Health as part of your role, you are responsible for looking after other people's data in the same way as you would your own.

Data controllers in common – organisation-led schemes

For the purposes of GDPR the Ramblers is a data controller, processing personal data to achieve its charitable objectives. Organisation-led schemes also are data controllers dealing with the personal information they collect, store and process. Walkers' personal data will be shared between the Ramblers and organisation-led 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. This is because whilst shared data for the Walking for Health programme is used for a shared purpose, some of the information may be used by each controller for other purposes as well. In order to ensure the lawfulness under GDPR of all data sharing, a data sharing agreement has been produced for the Ramblers and each organisation-led scheme that uses the Walking for Health database to sign.

Data Processors – volunteer-led schemes

While a data controller collects and uses data for their own purposes, a data processor collects and inputs data on behalf of a data controller. Walking for Health is a data controller, and volunteer-led schemes are data processors as they collect and input data on behalf of Walking for Health. We have produced data

processing guidelines and a data processing agreement which volunteer-led schemes must confirm they will follow.

Collecting data (purpose and informed, unambiguous consent)

Two big principles of GDPR are purpose and informed, unambiguous consent. This means that if we want to collect data, we have to be crystal clear about why it's being collected and ask people to give their consent to their data being used for these purposes. Data must not later be used for other purposes incompatible with the original purpose.

Permission to contact individuals (positive opt-ins)

We are not allowed to contact individuals unless we have their active, informed consent and they have positively opted-in to hearing from us, or we have a legitimate interest for doing so, for instance if a walk is due to be cancelled. This means we can't use pre-ticked checkboxes, or assume that if someone is happy to hear from us by email we can also send them post. They must actively choose to hear from us, and tell us which channels they are happy for us to use. We must also record how and when consent was given.

Respecting individual's contact preferences (opt-outs)

We always need to make sure that we are respecting individuals' contact preferences. This means not sending them things if they have opted-out of communications, and always having a method for people to update their contact preferences (e.g. unsubscribe links on emails, or guidance on printed material about how to opt-out).

Children's data (under 18s)

The GDPR is much more stringent around data relating to anyone under the age of 18. Under-18s can only participate with Ramblers Walking for Health if they are accompanied by a responsible adult. In these cases please ensure that you do not collect any data from them and avoid taking photos of them unless you have explicit permission from their parents.

Documenting why and how data is processed

Under GDPR it is essential that how data is processed is documented. Schemes should also undertake this, and to support you, we have created a pre-populated "Managing personal data" template.