

Guildford Health Walks Managing Information Procedure

As long as you follow this procedure, you'll be doing everything right.

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All our guidance and resources to help you follow our Managing Information Policy.

This procedure explains what you need to do to follow our Managing Information Policy. It will help you make sure all the personal data you come into contact with through Guildford Health Walks is managed safely and legally.

Data protection laws can be complicated and difficult to understand. But as long as you follow this procedure, you'll be doing everything right.

If you don't follow this procedure, you could make yourself personally responsible for a data loss, disclosure or breach. We may also suspend or withdraw your Guildford Health Walks membership. So it's important you understand what you need to do and ask questions if you're not sure.

If you have any queries at all, speak to our Membership Secretary,
Membership@guildfordhealthwalks.org.uk

Data protection covers lots of areas. So we've split our procedure across different pages to make it easier for you to find what you're looking for:

1. Collecting, using and destroying personal data

As a volunteer you'll collect and use personal data all the time. So it's important you know how to do this correctly.

Collecting personal data

You might collect personal data about walkers and other adult volunteers in lots of ways. For example:

- By using a registration form.
- By phone/WhatsApp.
- In person.
- By email.

Photos and videos are also a type of personal data. See 2. Photos and Videos.

Storing personal data

Once you've collected personal data, you need to store it safely and securely. This means nobody else should be able to see it. Even if someone is involved with Guildford Health Walks, it doesn't mean they should have access to the same personal data as you.

- If you need to upload information collected from the Walker Registration Form, keep it safe until you can do this. Once it's on the database, destroy or delete the relevant parts of the form, notes or email you used to collect the information.
- If you're keeping personal data at home, make sure your family and friends can't see it. Locking it away somewhere safe is always a good idea. If that's not possible, pop it in a drawer or closed bag. Don't leave any personal data in your car as you could lose it or someone could steal it.

The amount of time you should keep data for varies, depending on what you use it for. Our data retention schedule (8.4f) explains how long you need to keep different files. Find out more about destroying information further down this page.

Using electronic devices

You can use your personal devices – your smartphone or tablet, for example – to process Guildford Health Walks personal data. Try to only use one device, as this will reduce your risk of keeping out of date or inaccurate information. It'll also make it easier to delete information regularly.

- Make sure your device is password protected.
- Regularly delete information you no longer need from your device, and from your cloud storage.
- If you share your device with other family members or children, make sure only you can access Guildford Health Walks information.
- Add a password to any email accounts or documents, or set up a separate profile only you can access.
- If you're using a work device be aware of what the IT team at your workplace may be able to access. Don't save any personal data others could see.

Keeping information up to date

Once you've collected personal data, you need to make sure you keep it up to date. Keeping old or inaccurate information will make Guildford Health Walks run less effectively and may even pose a risk to walkers/volunteers' safety. So it's important you regularly review what you have.

Regularly remind volunteers and walkers to update their contact information.

At least once a year:

- check your details are up to date
- remind volunteers and walkers to update their details
- check the information you have saved anywhere else is still correct.

Using personal data

Personal data – Guildford Health Walks collects data that can only be used for the specific purpose we collected it for. This means we must only use it to help with the day-to-day running of Guildford Health Walks and to allow members to take part in walking activities.

Some examples of ways you can use data include:

- Contacting members about arrangements for meetings and activities.
- Letting walkers and volunteers know about Guildford Health Walks' rules and policies, and other conditions of membership.

Unacceptable uses of personal data

You mustn't:

- use personal data to communicate with people about activities not related to Guildford Health Walks. For example, you can't send emails about another organisation or non-walks activity you're part of;
- share data with anyone else, including other Guildford Health Walks volunteers, if you don't have consent to do so;
- share any sensitive personal information, such as medical and equalities monitoring;
- continue to use data you get from Guildford Health Walks if you change roles, move area, and no longer have access to this information;
- continue to use data you get from Guildford Health Walks after you've left.

Deleting and destroying information

Our data retention schedule lets you know how long you should keep different documents.

What you can keep:

- Current records. Make sure you store these securely.

- Some historic records. Find out more about what you can keep in an archive below.

What you can't keep:

- Old forms.
- Contact lists.
- Sensitive personal information, such as medical and equalities monitoring.
- Photos you don't have permissions for. **See 2. Photos and Videos.**
- If you move to a new area, or leave Guildford Health Walks, you must hand over all your historic records to another leader or your coordinator. If you change role, check if you should still have access to historic records and hand them over if necessary.

Destroying forms

You need to destroy forms after you've used them for their specific purpose. You can shred or rip them so no one can put them back together and read them.

You should delete electronic forms, including from your email and cloud storage. Check the help tab on your email or cloud storage provider to find out how to permanently delete things.

(See our forms 8.4a Managing Information, and 7.14 Keeping Information Safe)

2. Photos, videos, and audio

How to handle photos and videos taken on the Guildford Health Walks.

Taking and sharing photos and videos is a great way to show people the variety of beautiful landscapes in which our walks take place.

But photos where you can clearly see someone's face, or you can tell who a person is, are personal data. That means you need to handle them carefully.

Getting consent

Walkers and volunteers can choose how their images are used.

Here are the options, as per Photo Permission form:

- Give permission to Guildford Health Walks to use this/these photograph(s)/video/audio recording taken of me in local publications, and the internet to illustrate our work and to

promote walking and Guildford Health Walks, and for fundraising purposes. Please note that 'internet' also includes use on social media.

- Give permission to Guildford Health Walks to use this/these photograph(s)/video/audio recording taken of me to be used for unit use only – this means I am happy for photos, videos, and other visual and audio content to be taken/collected, used as a record of unit activities and shared on closed WhatsApp groups, directly by email, or on the closed group Photo Gallery on the Guildford Health Walks website, but not be published in any public-facing media and not shared outside the unit.
- Do not take or use photo/videos/audio recordings – this means they do not want photo's, videos, and other visual and audio content to be taken or used.

Group/walk leaders are responsible for:

- reminding all participants in all Guildford Health Walks to keep their photo permissions up to date, and asking them to let you know if anything changes. **You need to do this at least once a year.** We also recommend you do it before all walks in case they want to change permissions if needed.
- making sure anyone taking photos or videos on walks is aware of the group's photo permissions and what this means.

Taking non-identifiable photos

If you're unsure what permissions all walks participants have given, you can still take photos and videos as long as you can't identify anyone in them.

You could:

- take photos of backs of heads instead of faces
- Ask participants to step aside if they do not wish to be photogtaphed.
- use other creative ways to capture the moment, for example, taking photos of the landscape with the group from behind in the distance.

Storing photos and videos

You must:

- store photos and videos in a secure place, like a password protected folder on your computer, or in cloud storage with limited access.
- delete photos and videos from all devices after they've been used for the reasons they were taken. You must delete photos and videos within 14 days. For example, after you upload photos to social media pages or share them with participants, you must delete

them from the phone or camera they were taken on. You must check your personal cloud backups and delete photos and videos from there too.

You can store non-identifiable photos, like obscure photos or photos of objects, in a separate labelled folder.

Receiving photos

Sometimes someone may send you photos that were taken on a walk. Make sure they have the right permissions to do this.

Photos of people who have left Guildford Health Walks

Photo permissions finish when a volunteer or walker leaves Guildford Health Walks. If you know someone has moved away or has left Guildford Health Walks, you should stop using images of them at that point. You can keep some photos in your unit archives.

Photos as a part of history

You can keep photos as part of an archive and to celebrate the history of Guildford Health Walks. You must store both physical and digital copies securely. For example, you could lock them inside a cupboard, or have them on a password protected device or in cloud storage with limited access.

You can only keep photos for archiving. All other photos need to be used for the purpose they were taken, then deleted from any personal devices.

3. Contacting other volunteers and walkers

Find out how you should communicate with other volunteers and walkers.

As a Guildford Health Walks volunteer you need to make sure that you use people's contact details appropriately.

Email

One of the most common ways you'll communicate with others in Guildford Health Walks is by email.

See 1 above, **Collecting, using, and destroying personal data**. There is a list of rules you should follow to make sure you're emailing safely and securely.

Don't forget to use the Bcc field if you're emailing more than one person so you don't share anyone's personal email address.

Social media, including WhatsApp and Facebook

Another common way of communicating with volunteers and walkers is through social media. Not everyone will be comfortable or have the technology to communicate in this way, so make sure you offer other ways as well.

Before setting up a WhatsApp group, here are a few things you need to think about:

- if it's a group for volunteers and walkers, make sure to only include those listed as registered with Guildford Health Walks. If a volunteer or walker asks for another family member to be added to the group, make sure there's a practical reason for this.
- what information will you share in this group? Will it just be for sharing important updates about the walks? Or will you also share photos and videos?

Make sure you're only sharing things that are appropriate for group members to see.

When you set up your group, let volunteers and walkers know that:

- they can choose whether to join the group or not. You can explain the benefits, but you can't add them without their consent
- other group members may be able to see their contact details or other information. They should check the privacy and security settings of their account before joining
- they can leave the group at any time
- they shouldn't share personal data if they don't want others in the group to see it.

Make sure it's a closed or private group, so only you can add people. You should know who everyone is, and remove people when they shouldn't have access anymore, for example if someone leaves the group.

See our Safeguarding procedure, form 7.12.

Information on fundraising

If you want to talk about fundraising activities in emails or in a newsletter, be aware you can **only send these to members who have agreed to receive fundraising communications through their marketing preferences.**

Service messages

A service message includes anything vital to someone's membership, their role in volunteering, or information all walkers must know. If you're involved with Guildford Health Walks, you can't opt out of these messages because they contain essential information.

Service messages to volunteers and walkers can include information about:

- safeguarding
- changes in leadership
- essential training, such as data protection
- meetings
- updates to policies and procedures
- any changes to Guildford Health Walks
- membership information
- membership system changes.

4. Sharing personal information

As a Guildford Health Walks volunteer with access to personal data, it's important you know how to share it correctly.

What is personal data sharing?

Personal data sharing can be from:

- one person to another person. For example, a leader sharing information with another leader
- Internal. For example, different parts of Guildford Health Walks sharing information

Data protection laws don't stop us sharing personal data, but they do regulate how we do it.

Sharing data

You may need to share personal data while doing your Guildford Health Walks role. You'll need to make sure:

- Volunteers and walkers agree to this. For example, you may know a member has recently had a bereavement. But you shouldn't share this with anyone else without their permission. If you're not sure whether it's OK to share something, or you don't feel comfortable asking, don't share it
- you're only sharing necessary information. For example, if you're sharing information for a printed attendance list, don't include addresses or dates of birth
- you're only sharing personal data with Guildford Health Walks walk leader volunteers. You can't share someone's address or phone number without their permission.
- you're not sharing volunteer or member personal data that isn't for the purposes of managing Guildford Health Walks membership.

Sometimes you can share information in a way that wasn't agreed to and without getting permission first. There must be an important reason for this. It must also be in the interests of the person whose data you're sharing. Some examples include:

- If you have a safeguarding concern, allegation or disclosure, you must share relevant personal data with safeguarding@guildfordhealthwalks.org.uk
- Our Safeguarding Manager can share personal data if someone's at immediate risk of harm. This could mean sharing the information with police, children's services or other statutory agencies. For more information, email our Data Manager data@guildfordhealthwalks.org.uk

In a medical emergency you might need to share information about someone's medication or health conditions.

Sharing data safely

Only contact people using their contact details on the Guildford Health Walks database.

By email

- Make sure you double check you're emailing the right person. Sending personal data to the wrong person is a data breach.
- Send personal data as a password protected attachment rather than in the main body of the email.
- You mustn't include the password for the attachment in the original email. Share the password in a different way, like in person, or by texting it. Only send a second email with the password if there's no alternative.

By phone or in person

- Confirm you're speaking to the right person. If you're speaking on the phone, it's better if you can call them so you can be sure. If they call you, use caller ID to confirm their identity. If you're not certain, hang up and call them back using a different phone.
- Make sure you're both somewhere private. Other people overhearing personal data is a data breach.

By post

- Double check the name and address on the envelope. If in doubt, contact the person you're sending the information to first to confirm.
- Use a 'tracked service', such as special delivery.

Sharing information with the wrong person is a data breach and you must report it to the data@guildfordhealthwalks.org.uk. Find out more about data breaches on form 8.4c, or see item 6 below.

5. Personal data requests

How to make a personal data request, and what to do if you receive one.

We all have rights about the personal data organisations hold on us. That includes the information Guildford Health Walks holds about our volunteers and walkers.

(See our Personal Data Privacy Notice 4d and form 8.4e Personal Data Requests procedure.)

Receiving and responding to data requests

As a Guildford Health Walks volunteer you might receive a data request from someone else involved in Guildford Health Walks.

You might be asked to:

- provide copies of someone's data
- check or correct someone's data
- delete someone's data
- stop taking an action based on the data we hold about someone.

What happens next?

You may receive questions like:

- 'I want to see and be provided with copies of the data you hold about me.'
- 'I want you to delete my information from your records.'
- 'Why are you using my data? I haven't given you permission to do that.'
- 'Are you allowed to use my personal data to do that?'

It's important you deal with these requests in line with data protection law and our own policies.

If the query is about updating details on the Guildford Health Walks database, you can do this locally. It's the Group Walk Coordinators' responsibility to make sure information on the Guildford Health Walks database is up to date, so it's important you support everyone to update their details, or arrange to make the updates for them.

If you can't deal with the request quickly at a local level, you must forward on the request for information to our Data Manager, data@guildfordhealthwalks.org.uk.

Once a data request has been processed, we may need to get back in touch to find out what information you have locally.

We may ask you to review and share information from any email accounts you've used for your Guildford Health Walks role if you hold personal data on the person. Our Data Manager will support you with this.

By law Guildford Health Walks must respond to data requests within 30 days. Your help is important so we can meet this deadline.

Data requests from non-Guildford Health Walks members

If you receive a request for information from a non-Guildford Health Walks member, including the police, an embassy or another agency, ask them to email our Data Manager, data@guildfordhealthwalks.org.uk

We'll make sure their request is legitimate. If necessary, we may come back to you for any relevant information you hold.

We're here to help

We want you to feel confident about how to direct these queries. If you're ever unsure what to do, or have any questions or concerns, email our Data Manager, data@guildfordhealthwalks.org.uk.

6. Reporting a data breach

What to do if personal data has been lost, stolen or shared inappropriately.

It's everyone's responsibility to keep personal data safe, secure and confidential.

But sometimes mistakes happen. The most important thing is to act quickly when they do.

Remember, you're responsible for reporting data breaches to our Data Protection officer immediately after you find out about a breach.

(See forms 8.4c Data Breach Procedure and 8.4d Data Breach Notification).

What's a data breach?

A data breach is an incident that results in loss, theft, deletion, unauthorised sharing or unauthorised access to personal data.

Some examples include:

- Emailing personal data to the wrong person.
- Leaving register forms on the bus.
- Leaving documents in the boot of a car which is then stolen.
- Posting personal data on social media without permission.
- Losing a walk group contact list.
- Letting someone else use your Guildford Health Walks website password.
- Losing a memory stick with an emergency contact list on it.
- Being overheard talking about personal data.

What do I do if I discover a data breach?

Report

You must report all data breaches to our Data Manager. You should make your report immediately if possible, and always within 24 hours of finding out about the breach.

You still need to report the breach even if you're able to get the information back. By law, Guildford Health Walks must keep a record of all actual and potential breaches.

You can report a data breach by:

- filling in our Data Breach Notification Form (see 8.4d) and emailing it to our Data Manager, data@guildfordhealthwalks.org.uk

or

- if you can't find the form or you're having trouble filling it in, email our Data Manager, data@guildfordhealthwalks.org.uk

If you're not sure if a data breach has taken place, report it anyway. It's better to over-report than under-report!

Reduce the impact

Try to reduce the impact of the breach as soon as possible.

For example:

- If you've sent an email to the wrong person, send a second email asking for it to be deleted.
- If someone else finds out your Guildford Health Walks website password, reset it or contact our Data Manager, data@guildfordhealthwalks.org.uk to have your account suspended.
- If you've left documents with personal data somewhere, like on the bus or in a café, go back and check if someone has handed them in.
- If personal data has been posted online then delete it if you can.

Follow up

After you've sent us the data breach notification form, we'll work with you on any further action that's needed.

This could include:

- Contacting the people whose personal data has been affected by the incident.
- Making changes to the way you or the person who caused the breach handles personal data in the future.

- Doing more training on data protection.

Any follow-up actions the Data Manager gives you are compulsory. If you don't do them, we may suspend or withdraw your membership.

We're here to help

We want you to feel confident about handling a data breach. If you have any questions or concerns, please email our Data Manager, data@guildfordhealthwalks.org.uk.