

GDPR and BMC-affiliated clubs

Member Contact Lists



This document should be read alongside the article '[Processing Personal Data](#)' to further understand why clubs need to ensure that they are lawfully processing data.

Many clubs have, for many years, produced annual lists of their members that have been posted out to all members. Sometimes the list has been part of an annual club handbook. In more recent years this list may have taken on an electronic format and have become an emailed list or available via a secure area of a club website.

GDPR, when it arrives in May 2018, will bring new rules that are likely to impact on how clubs share personal data around their members. Any changes that a club needs to make will depend on how the club currently operates, and ultimately it will be for your club to decide what to do given the information provided in this document and elsewhere.

NB It is important to remember that just because something has been done a certain way for many years and without an incident doesn't mean that it is the right (or lawful) way for the future.

Points to consider

The following are points that clubs must consider if the club wishes to continue providing member details to all members....

- For member details to be made available to other club members (in any format) the specific consent from each member will be needed
- Clubs must allow members to opt-in to what details are circulated and must allow members the option of not having any details circulated. It must not be a condition of membership of the club that details have to be shared.
- Clubs will need to re-ascertain consent on a regular basis, ideally at least once a year
- Clubs need to be mindful that even though consent may have been given at one point it can be withdrawn at any future point, including the day after a club has posted out a club list to every member. If an individual withdraws their consent the club needs a clear way to action the withdrawal of that data. This could potentially result in a recall of all the club lists that have been posted out or the club may not be allowing the individual their lawful right of withdrawing consent. Because of this risk, clubs may decide that if they wish to use a club list then a secure area on the club website is easier to manage.
- Clubs need to ensure that data is accurate. If a member changes their contact details after the list has been produced clubs need to consider how the club will ensure that the club lists are updated, and that inaccurate data is not available to other members.
- Clubs should consider what data needs to be circulated for communications between members, i.e. is a full postal address really needed in the 21st century, or is a phone number and/or email address more appropriate?
- Clubs need to tell the recipients (members) what they can/can't do with the data in the lists, i.e. they can't pass or sell the data on to anyone else, and members can only use the data for club related communication.

- Clubs need to ensure that data is not held for longer than is needed. A system would be needed by the club to ensure that club lists are deleted by members once superseded / not needed.

The BMC does not intend to specify whether clubs should or should not provide member lists, but it is important that clubs make an informed choice for their own situation, whilst still ensuring that they are acting lawfully by abiding by GDPR.

Over the coming months there will be regular updates and guidance about how to become GDPR compliant. Check out www.thebmc.co.uk/gdpr-mountaineering-clubs for the links to other articles

GDPR arrives on 25th May 2018 – Be ready!

This document has been written for the committee of a mountaineering, walking or climbing club to use while reviewing the way that their club processes data within their club to ensure compliance with GDPR. It is based on information available at the time of writing. There are several topics where the Information Commissioners Office still has to provide full guidance, therefore additional information may be made available to clubs in the future.

This guidance is provided by the BMC to assist clubs and does not constitute legal advice.