



PULLING TOGETHER LUDLOW

DATA PROTECTION POLICY

1. 'Pulling Together Ludlow' (PTL) is an informal group created for the duration of the present Covid-19 emergency and its consequences. It has no legal standing, but its partners include "Hands Together Ludlow" (HTL) (a Registered charity also registered with the Information Commissioners Office) and both General Practices in Ludlow, both legal Partnerships contracted to the NHS. Neither the NHS nor HTL are the owner of PTL personal data for GDPR purposes.
2. For the duration of the present emergency, PTL expects that 'responsible and proportionate behaviour regarding personal data' will be the guidance provided by the ICO, see:

<https://ico.org.uk> .

Also, see here:

<https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2020/03/coronavirus-and-personal-data/>

and here

<https://ico.org.uk/about-the-ico/news-and-events/news-and-blogs/2020/03/covid-19-general-data-protection-advice-for-data-controllers/>

for their current detailed guidance.

3. We collect and use personal data about volunteers and people requiring help. This data is collected on the legal basis of 'consent' for GDPR purposes. We also collect limited records of phone calls (calling number and duration only) as part of the telephone system that supports our operation. We do NOT record calls at any time.
4. Personal data of all sorts is only made available to volunteers on a "need to know" basis. We do not publish this information for general use nor will we supply it to other organisations without the consent of the individuals concerned.
5. During the emergency, we will retain and use personal data to analyse our work in terms of demand for services, locations of demand and the work carried out by volunteers. Analysis will only be made public in an anonymous form.
6. At the end of the emergency, when it is decided that volunteer support from PTL is no longer required, all personal data (for clients and volunteers) will be deleted according to a recognised security standard.
7. Although we work closely with the General Practices we have no access to, neither do we seek, clinical data about individuals. This remains accessible only to the doctors and staff at the practices, according to NHS rules prevailing at the time. Talk to you GP if you are concerned about this.
8. If you post personal information on any public channel (e.g. on social media) then this must be regarded as being in the public domain.

9. If you have any queries about this Policy or wish to exercise any of your rights under the prevailing GDPR, please contact the Data Protection Officer at 'Hands Together Ludlow' using this email:

gdpr@handstogetherludlow.org.uk

The HTL DPO has no legal responsibility for PTL data, but is acting as advisor to the group.

* * * END * * *

Edition 1. March 22nd 2020.