

**POLICY NAME:** Responsible use, management, and protection of programme data policy

**APPROVED BY:** CPAC

**POLICY OWNER:** Co-Directors, HR

**CATEGORY:** Programme

**APPROVED:** June 7, 2019

**NEXT REVIEW:** June 2022

## 1. INTRODUCTION

World Renew's tagline is based on Micah 6:8 and captures the overriding values and motivations for our work: "Doing justice, loving mercy and serving Christ" in all we do. Our value of "People Flourishing" means, "We treat each person equally as an image-bearer of God." Our value of "Stewardship" means that we "steward God's gifts with integrity, accountability and systems of reporting that honour both the intent of the donors and the flourishing of people in communities."

In our systems of reporting, which necessitate the gathering and storage of Data, World Renew is guided by Proverbs 11:13: "A gossip betrays a confidence, but a trustworthy person keeps a secret." In a global context of expanding information technology, World Renew will seek to preserve the dignity and safety of all our Participants by responsible management of our Programme Data.

World Renew is committed to using Data responsibly in order to uphold the rights of the individuals, groups, and organisations with whom we work. Using Data responsibly is not just an issue of technical security but also of safeguarding the rights of people to be counted and heard; ensure their dignity, respect and privacy; enable them to make informed decisions; and not be put at risk, when providing Data.

World Renew has increasingly integrated advances in information communication technologies in all our programming. In order to be responsible with the programme data that is collected from people in the communities where we work, World Renew commits to uphold and protect the five rights related to information, as outlined in the Signal Code<sup>1</sup>, in all its programmes:

- i. The Right to Information
- ii. The Right to Protection
- iii. The Right to Data Privacy and Security
- iv. The Right to Data Agency
- v. The Right to Redress and Rectification

<sup>1</sup> Harvard Humanitarian Initiative (2017) The Signal Code: A Human Rights Approach to Information During Crisis, <https://hhi.harvard.edu/publications/signal-code-human-rights-approach-information-during-crisis>

# POLICY

## Responsible use, management, and protection of programme data

In addition, World Renew is committed to applying the Core Humanitarian Standard on Quality and Accountability (CHS)<sup>2</sup> across all its work. One of the organisational responsibilities that comes with that is to ensure that “Systems are in place to safeguard any personal information collected from communities and people affected by crisis that could put them at risk.” This policy seeks to lay the foundation for ensuring these systems are in place throughout the organisation. In addition, World Renew is committed to the application of the principle of “Do No Harm”, in the responsible use, management, protection and collection of Programme Data, including the protection of enumerators when collecting survey data<sup>3</sup>.

## 2. SCOPE

This policy is intended to apply to any Programme Data collected in the course of World Renew’s global programming work. It applies to Programme Data collected from individuals and communities affected by crisis, as part of World Renew’s development and/or justice programmes or wherever World Renew collects Programme Data. This Policy applies to all programmes funded by World Renew, including where those funds have come from external grants. The policy applies to all people who work in and through World Renew, including volunteers and staff of World Renew Partners, as they have unique access to Data collected for the purpose of supporting World Renew’s programmes.

This policy does not include Data collected from donors, supporters and World Renew website users. For information related to how this type of Data is collected and used, please refer directly to World Renew’s Privacy Policy<sup>4</sup>.

## 3. PURPOSE

World Renew recognises that all people, regardless of their gender, gender identity, sexual orientation, nationality, age, religion, race or any other legally protected characteristic, have an equal right to privacy of their Data. This policy seeks to ensure that Programme Data is managed responsibly to protect the information rights of all individuals whose Data is collected, for whatever reason and by whatever means, by World Renew and its Partners.

2 <https://corehumanitarianstandard.org/the-standard>

3 <https://www.alnap.org/help-library/alnap-guide-evaluation-of-protection-in-humanitarian-action>

4 Information on World Renew’s Privacy Policy can be found on the website: <https://worldrenew.net/privacy-policy>

### 4. PRINCIPLES

To safeguard the Personal Data entrusted to World Renew, and to comply with applicable law, World Renew is committed to collecting, using and disclosing data in accordance with the OECD Privacy Principles<sup>5</sup> as follows:

- **Collection Limitation Principle** – Personal Data collection should be limited and the Data should be obtained by lawful and fair means, and, where appropriate, with the knowledge or consent of the individual.
- **Data Quality Principle** – Personal Data should be relevant to the purposes for which it is to be used and only to the extent necessary for those purposes, and should be accurate, complete and up-to-date.
- **Purpose Specification Principle** – the Personal Data collection purposes should be specified no later than the time of collection, and subsequent use should be limited to those purposes.
- **Use Limitation Principle** – Personal Data should not be disclosed, made available or used for purposes other than those specified consistent with the Purpose Specification Principle above unless an individual provides consent or otherwise required by law.
- **Security Safeguards** – Personal Data should be protected by reasonable security safeguards against such risks as loss or unauthorised access, destruction, use, modification or disclosure of data.
- **Openness Principle** – A general policy of openness should exist about the organisation’s development, practices and policies regarding Personal Data.
- **Individual Participation Principle** – An individual should have the right to obtain confirmation of whether Data is retained relating to him or her and to obtain a copy of that Data, and subsequently have that Data erased, rectified, completed or amended.
- **Accountability Principle** – World Renew should be accountable for complying with measures giving effect to the principles stated above.

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<sup>5</sup> <http://oecdprivacy.org/>

### 5. POLICY<sup>6</sup>

World Renew and its Partners are committed to using Data responsibly in order to uphold the rights and safeguard the information of the individuals, groups, and organisations with whom we work. This section sets out the policy for the treatment of Programme Data by World Renew and its Partners throughout the data lifecycle from planning to collection through to disposal.

#### 5.1 Disaggregation of data

In order to better represent the diversity of communities, and in particular to ensure the rights of vulnerable, disadvantaged and marginalised populations, (taking into account gender, age, disability, minority or specific ethnic groups, for example) it is important that they are able to be counted and adequately represented as part of the information World Renew and its Partners collect and uses. Therefore:

- Where appropriate and possible, World Renew and its Partners will make every effort to ensure that vulnerable groups, including, for example, women, members of indigenous groups, and persons with disabilities, are fully represented in data collection, and that the resulting datasets can be disaggregated by gender and other relevant categories.
- World Renew and its Partners will use all reasonable efforts to ensure the inclusion of participants from marginalised populations.
- World Renew and its Partners will use all reasonable efforts to ensure the accuracy of Data collected, stored, and used, including using all reasonable efforts to keep information up-to-date and relevant.
- Subject to applicable law, and according to the purpose for which it was intended and for which consent was sought, World Renew and its Partners will seek to appropriately analyse, utilise, and disseminate the information it collects in order to ensure Participants' right to be heard, especially within marginalised populations. This dissemination should include communicating findings to the surveyed population, when feasible, as part of World Renew's commitment to social accountability.

#### 5.2 Upholding dignity and respect

World Renew and its Partners will ensure that all individual's personal dignity is maintained and respected in all phases of the Data lifecycle. Therefore:

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<sup>6</sup> The contents of section 5 of this policy were adapted from Oxfam's "Responsible Program Data Policy" (2015), <https://policy-practice.oxfam.org.uk/publications/oxfam-responsible-program-data-policy-575950>

- World Renew and its Partners will collect, use and disclose Data in a manner that is culturally and contextually appropriate.
- World Renew and its Partners will limit its collection, use and disclosure of personal data to purposes that a reasonable person would consider appropriate under the circumstances.
- World Renew and its Partners will plan the Data lifecycle in such a way as to not create an excessive burden on Participants, carefully considering what Data are needed and why; how it will be used; and how to collect only the minimum Data required to accomplish programmatic aims.
- World Renew will seek, where possible, to work with donors or other stakeholders to restrict their Programme Data requirements to that which is deemed necessary to accomplish programmatic aims.

### 5.3 Consent

Participants have the right to be fully informed in order to make a meaningful decision about their participation in any Data activity, including provision of their Personal Data. Therefore:

- World Renew and its Partners will seek to gain meaningful consent before obtaining any Personal Data from participants. Data will only be used for the purpose it was collected for.
- To obtain such meaningful consent, World Renew and its Partners will make privacy information readily available in complete form, while giving emphasis or bringing attention to four key elements: (i) what Personal Data is being collected, with sufficient precision for individuals to meaningfully understand what they are consenting to; (ii) with which parties Personal Data is being shared; (iii) for what purposes Personal Data is being collected, used or disclosed, in sufficient detail for individuals to meaningfully understand what they are consenting to; and (iv) risks of harm and other consequences.
- Programme Data will only be used for the purpose it was collected for and Personal Data specifically will only be used for the purpose for which individuals gave their consent.
- All Participants are free to choose whether to give their consent, based upon an understanding of the relevant facts and risks, without inducement or negative consequences should they choose not to participate.
- All Participants are free to withdraw their involvement in the Data activity at any stage without any negative consequences, including their participation in World Renew and/or and its Partners' programmes.
- If the Data process involves minors, World Renew and its Partners will comply with applicable law and will obtain all required consents.
- Consent will be based on a transparent and accurate assessment about the use of Data and context. If the use or the context changes, then World Renew and its Partners will re-evaluate whether additional consent needs to be obtained from individuals for the new purpose.

### 5.4 Right to Privacy

World Renew and its Partners will seek to ensure a Participant's right to privacy in the treatment of their Data consistent with the OECD Privacy Principles outlined in Section 4. In addition, World Renew and its Partners have a responsibility to protect the identity of those providing Data, unless otherwise outlined and agreed to through meaningful consent. Therefore:

- World Renew and its Partners will seek to ensure that, when appropriate, the process of Data collection is conducted in an environment where the privacy of the Participant (or group of Participants in the case of focus group discussions) is upheld.
- Personal Data will not be shared with any third party unless affirmative consent is provided by the relevant individual, the sharing is required by law or under exigent circumstances to protect imminent loss of life or property damage.
- World Renew and its Partners will not discuss or share in any form, information gathered from Participants with any unauthorised persons.
- World Renew and its Partners will seek to minimise the collection of Data, only collecting it when absolutely essential for the data activity.
- World Renew, and its Partners, commit to restricting the collection of Personal Data. Personal Data may only be collected if an exception is granted and World Renew is able to document that it, and the local Partner (as applicable), have taken sufficient steps to prevent the unauthorised disclosure of that Data.
- World Renew and its Partners will ensure limited access to Personal Data records to authorised personnel only and will store the Data securely, using adequate physical, organisational and technological measures to protect the Data.
- While World Renew and its partners encourages Data sharing for transparency and accountability purposes, Data which are shared openly must be anonymised, unless specific consent from the Participant has been obtained, and it does not place Participants at risk.

### 5.5 Right to protection

World Renew will endeavor not to put Participants in any security risk as a result of its Data activity, working with our Partners to ensure the same where necessary. Therefore:

- World Renew and its Partners will not collect non-essential data that could put participants at risk without the express consent of the individuals involved, and a clear process for managing and mitigating that risk.



- World Renew and its Partners will take all reasonable measures to ensure that the process of Data collection and the totality of the Data lifecycle have no negative physical, psychological, or political consequences for the Participants.
- World Renew and its Partners will ensure protections are in place to store all data securely<sup>7</sup> using adequate physical, organisational and technological measures to protect the Data.
- World Renew and its Partners will ensure that Personal Data that is no longer required to fulfil the identified purposes shall be destroyed, erased, or made anonymous. World Renew guidelines and procedures govern the destruction of Personal Data. World Renew and its Partners shall use reasonable care in the disposal or destruction of personal information, to prevent unauthorised parties from gaining access to the information.
- World Renew and its Partners will endeavor to mitigate risk to all its Participants, but especially Participants from vulnerable populations and groups. Data collection and handling of information about people that could lead to stigma or discrimination should only be managed by personnel with the appropriate training and experience.

### 5.6 Handling queries and complaints

All people have the right to rectification of demonstrably false, inaccurate, or incomplete Data collected about them. As part of this right, individuals and communities have a right to establish the existence of and access to Personal Data collected about themselves. All people have a right to redress from relevant parties when harm was caused as a result of either Data collected about them or the way in which Data pertaining to them were collected, processed, or used. Therefore:

- World Renew and its Partners will seek to promptly respond to all reasonable queries related to a Participant's Data that has been collected.
- World Renew and its Partners commit to promptly rectify Data based on any reasonable requests to correct false, inaccurate or incomplete Data, where the identity of the person requesting changes to their (or their dependent's) Data has been confirmed.
- World Renew and its Partners will establish mechanisms in communities where we work that enable individuals to submit a complaint in the event that any harm was caused as a result of Data collection, processing or use (see World Renew Complaints Policy).
- World Renew and its Partners will handle any such complaint related to Data use in line with the procedures outlined in World Renew's Complaints Policy.

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<sup>7</sup> In situations where the necessary IT (or other) infrastructure is owned by another entity (eg Christian Reformed Church in North America - CRCNA), World Renew will work closely with that entity to help ensure necessary protections are in place.

## 6. MONITORING AND REVIEW

This policy will be reviewed every 3 years and updated based on World Renew's and our Partners' experience of implementation and to include further developments in the area of Programme Data use and information technology. Progress in information technology in relation to Data, and expansion of World Renew's programming to include different nationalities (eg EU Citizens) should be monitored in case the changing context requires an earlier revision of this policy.

## 7. KEY TERMS AND DEFINITIONS<sup>8</sup>

*Data:* the physical representation of information in a manner suitable for communication, interpretation, or processing by human beings or by automatic means. Data may be numerical, descriptive, audio, or visual, and includes Personal Data.

*Data agency:* Everyone has the right to agency over the collection, use, and disclosure of their personally identifiable information (PII) and aggregate data that includes their personal information, such as demographically identifiable information (DII).

*Data privacy:* Data privacy refers to making sure that data is used in the correct manner and governs how data is collected, used, shared, disclosed and retained.

*Data security:* Data security refers to the process of protecting data from unauthorised access and data corruption throughout its lifecycle.

*Participants:* Any individual or group that World Renew and its partners works with or collects Data from in the course of their humanitarian, development, justice programmes or otherwise.

*Partner:* an organisation that World Renew enters into a Partnership agreement with to collaborate on a mutually agreed action.

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<sup>8</sup> World Renew commits to complying with its applicable statutory and legislative obligations. Accordingly, the specific definitions, terms or concepts used in this policy are for reference purposes only. If necessary, the applicable state, provincial or federal definitions mandated by the appropriate jurisdiction where an employee is employed, will take precedence and/or will supersede the definitions outlined in this policy.



## **POLICY**

### **Responsible use, management, and protection of programme data**

*Personal Data:* Data relating to an identified or identifiable individual.

*Programme Data:* Data (including Personal Data) collected from communities and people affected by crisis and/or participating in World Renew's development and justice programmes.

*Redress and rectification:* All people have the right to rectification of demonstrably false, inaccurate, or incomplete data collected about them. As part of this right, individuals and communities have a right to establish the existence of and access to personal data collected about themselves. All people have a right to redress from relevant parties when harm was caused as a result of either data collected about them or the way in which data pertaining to them were collected, processed, or used.

*World Renew Staff:* Refers to all World Renew staff, volunteers, consultants, exposure visit participants, contractors and fieldworkers.