



Data Management and Protection Policy

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1. Scope

As a humanitarian organisation, Doctors For You (DFY) 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 and even importantly ensure their dignity, respect and privacy; it enables them to make informed decisions; and not be put at risk, when providing data. DFY acknowledges that information technology should be at the service of every citizen. Information and data collected by DFY will not be used to violate human identity, human rights, privacy, or individual or public liberties. DFY is committed to international standards of compliance with data protection laws. Our Data Protection Policy applies worldwide to DFY and is based on globally accepted, basic principles on data protection. Ensuring data protection is the foundation of trustworthy relationships and the reputation of DFY as a credible organisation.

- This Data Protection Policy applies to all entities of DFY, including network and branch offices in all countries of operation.
- The policy applies to all DFY staff and governance members.
- The provision of this policy may also be applied to any person employed by an entity that carries out missions for DFY.
- In particular, this policy applies to implementing partners, suppliers, sub-grantees, stakeholders and other associated entities.

DFY's Data Protection Policy applies to all personal data that DFY holds relating to identifiable individuals, meaning any information relating to an identified or identifiable individual. DFY Data Protection Policy applies to all sets of personal data, currently stored, maintained and handled by DFY, and more specifically to the following identified sets of personal data:

- DFY's personnel, including national and international staff, interns, fellows and volunteers,
- DFY's direct and indirect beneficiaries, including interviewees,
- DFY's individual donors and sympathisers,
- DFY's contractors, suppliers, consultants, implementing partners currently under contract with DFY.

Personal data herein referred to, means any information relating to a natural person who is or can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to his physical, medical, physiological, mental, economic, cultural or social identity. This can include in particular:

- Names of individuals
- Postal or living addresses
- Email addresses
- Medical history
- Telephone numbers
- Identity card and passport
- Date and place of birth
- Identification of relatives
- Fingerprints
- Businessreference
- Geo-referencing
- Bank account data and other personal data.

Processing of personal data means any operation or set of operations in relation to such data, whatever the mechanism used, especially the obtaining, recording, organisation, retention, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, deletion or destruction.

2. Principles for Processing Personal Data

Fairness and Lawfulness

- When processing personal data, the individual rights of the data subjects must be protected. All personal data must be collected and processed in a legal and fair manner.

- Collected data shall be adequate, relevant and not excessive in relation to the purposes for which they are obtained and their further processing.
- Individual data can be processed upon voluntary consent of the person concerned. For all children consent to be taken from parents in written before the details are taken in.

Restriction to a specific purpose-

- Personal data can be processed only for the purpose that was defined before the data was collected. Personal data shall be obtained for specified, explicit and legitimate purposes, and shall not subsequently be processed in a manner that is incompatible with those purposes. Subsequent changes to the purpose are only possible to a limited extent and require justification.
- However, further data processing for statistical, scientific and historical purposes shall be considered compatible with the initial purposes of the data collection, if it is not used to take decisions with respect to the data subjects.

Transparency

- The data subject must be informed of how his/her data is being handled. In general, personal data must be collected directly from the individual concerned. When the data is collected, the data subject must either be made aware of, or informed of:
 - The purpose of data processing;
 - Categories of third parties to whom the data might be transmitted
- Processing of personal data must have received the consent of the data subject or must meet one of the following conditions: compliance with any legal obligation to which DFY is subject; the protection of the data subject's life; the performance of a public service mission entrusted to DFY.

Confidentiality and Data Security

- Personal data is subject to data secrecy. It must be treated as confidential on a personal level and secured with suitable organisational and technical measures to prevent unauthorised access, illegal processing or distribution, as well as accidental loss, modification or destruction.

Deletion

- Personal data shall be retained in a form that allows the identification of the data subjects for a period no longer than is necessary for the purposes for which they are obtained and processed. There may be an indication of interests that merit protection or historical significance of this data in individual cases. If so, the data must remain on file until the interests that merit protection have been clarified legally, or the corporate archive has evaluated the data to determine whether it must be retained for historical purposes.

Factual Accuracy and Up-to-datedness of Data

- Personal data on file must be correct, complete, and – if necessary – kept up to date.
- Suitable steps must be taken to ensure that inaccurate or incomplete data are deleted, corrected, supplemented or updated.

The Data Protection Policy ensures the adequate level of data protection as prescribed by relevant legal frameworks, including in countries that do not yet have adequate data protection laws. DFY data protection policy is meant to be a practical and easy to understand document to which all DFY departments, stakeholders and partners can refer to. DFY recognizes that people have rights with regards to the information related to them and that DFY has a responsibility to uphold those rights. The rights that form the backbone of this policy are:

This policy should not be seen as restricting or discouraging; rather, it sets out to facilitate the invaluable contribution that data makes to the quality of DFY's work, upholding accountability and allowing DFY to raise the voices of those with whom we work. For the purposes of this policy, "data" is considered to be 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. The formal term for individuals from whom data is collected is "data subjects". In this policy, however, we use the term "participants" and expand the

definition to include any group, cooperative, or other entity with which DFY works with that provide program data.

This document sets out the policy for the treatment of program data by DFY throughout the data lifecycle from planning to collection through to disposal. This data may pose varying degrees of risk to different stakeholders, including but not limited to the people who provide data, those that collect it, and DFY.

This policy pertains to data from all of our programs: Health and Nutrition, Emergency Response and Skill Development funded by both restricted and unrestricted funds. It will apply to all aspects of the project and program cycle as well as research. DFY will uphold this policy for all projects where DFY is the data controller. DFY is responsible for ensuring that all external individuals or organisations it works with during the data lifecycle (partners, contractors, etc.) comply with the policy.

This policy is designed to be forward-looking and prepare DFY for the future, establishing systems to enable the organisation to take full advantage of the current opportunities and future potential of the data revolution.

Recognising that the policy applies to a rapidly-changing technological context, DFY has a responsibility to stay abreast of the implications of these changes for its work. A set of minimum standards and guidelines accompanies this policy to provide details on how to operationalise the requirements and will be updated periodically.

Policy Elements

In order to ensure the rights of vulnerable and marginalised populations, including children and women, it is important that they are able to be counted and adequately represented as part of the information DFY collects and uses.

- Where appropriate and possible, DFY will make every effort to ensure that vulnerable groups including children and women are fully represented in data collection, and that the resulting datasets can be disaggregated by gender and other relevant categories.
- DFY will make all reasonable effort to ensure the inclusion of participants from marginalised populations.
- DFY will ensure the accuracy of data collected, stored, and used, including making efforts to keep information up-to-date and relevant.
- DFY will ensure that a participant's personal dignity is maintained and respected in all phases of the data lifecycle.
- Data will be collected in a manner that is culturally and contextually appropriate.
- It is necessary to be aware that there may be laws in addition to standards which regulate how DFY works with participants.
- DFY will intentionally 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.
- Participants have the right to be fully informed in order to make a decision about their participation in any data activity.
- DFY and its agents will gain informed and voluntary consent before obtaining any information from participants. Data will only be used for the purpose it was collected for.
- All participants are free to choose whether or not to give their consent, 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 DFY programs.
- If the data process involves minors, DFY will get both their, and their parents' or guardians', consent, except in circumstances when it is inappropriate to do so.
- Consent will be based on a transparent and accurate assessment about the use of data and context. If the use or the context changes, DFY will re-evaluate whether re-consent is needed.
- DFY will ensure a participant's right to privacy in the treatment of his/her data and has a responsibility to protect the identity of those providing data, unless otherwise outlined and agreed to in the informed consent.

- DFY and its agents will not discuss or share in any form, information gathered from participants with any unauthorised (by DFY) persons.
- DFY will minimise the collection of personal data, only collecting it when absolutely essential for the data activity.
- DFY will ensure limited access to identified data records and store them securely.
- While DFY 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.
- DFY will not put participants in any security risk as a result of its data activity.
- DFY 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.
- DFY will store all high-risk data securely.
- DFY will mitigate risk to all its participants, but especially participants from vulnerable populations and groups or any participants engaged in sensitive topics/activities. Such topics must only be approached by personnel with the appropriate training and experience.

Humanitarian Crises

Extra care will be taken with data collection in humanitarian conflict responses and emergency response. It is imperative that if data will compromise a person/s safety, those data should not be collected. In extreme cases where access is limited or denied, remote data collection may be considered. Measures must be taken to store data safely. Insurance policies should be in place to cover all eventualities. All responses in these vulnerable settings should be seen as high risk.

Governance and implementation of the Policy

The ultimate responsibility for this policy rests with the Executive Board of Doctors For You. Every 3 years, the Executive Board shall commission a review of, and seek recommendations on, potential updates to the Responsible Program Data Policy. This effort ensures that the policy remains current and relevant, given the changing context in which DFY operates. Following any updates to the policy, the set of minimum standards will also be reviewed and updated as required.

Policy implementation is the responsibility of DFY Board of Directors and their designates. Support for policy implementation will be provided by relevant personnel within each affiliate. Every three years, the Board shall commission a review of compliance with the policy, and seek recommendations on potential updates to the Responsible Program Data Policy.

Annex 1 - Artwork, Photo, Video and Interview Consent Form

I hereby grant to Doctors For You the right to reproduce, display and disseminate, worldwide and in perpetuity, in any print or electronic media format, my artwork, likeness, or one that I represent, as shown in the photographs, interviews and/or videos described below, which are owned by Doctors For You for the purposes of promoting its humanitarian relief and development programs worldwide.

I understand that I will not receive payment or any other compensation in connection with these images, videos and/or interviews, and grant permission for the materials described below to be used, edited and reused by Doctors For You, including in print, on the internet and in all other forms of media.

INDIVIDUAL CONSENT

The artwork, photographs and/or video were submitted on:

Date:	
Location:	
Name of photographer (if applicable):	

I further confirm that this media is being submitted with my knowledge and consent.

Name:		Date:	
Contact details:			
Signature:			

GROUP CONSENT

The artwork, photographs and/or video were submitted on:

Date:	
Location:	
Name of photographer (if applicable):	

I confirm that I have authority to sign this permission form on behalf of the group and I further confirm that this media is being submitted with our knowledge and consent.

Name of group rep:		Date:	
Contact details:			
Signature:			

CHILDREN UNDER THE AGE OF 18

I confirm that I am the legal guardian of the child named above and therefore may grant permission for this subject release on behalf of the child.

I further confirm that this media was submitted with my knowledge and consent.

Name of legal guardian:		Date:	
Relationship to child:			
Contact details:			
Signature:			
Name of witness:			
Signature:			

INTERPRETER

I confirm that I have verbally explained the contents of this consent form to the subject/guardian/ representative named above.

Name:		Date:	
Contact number:			
Signature:			
Contact details:			