

Data Privacy Foundation Training

Data Privacy Introduction



- Data Privacy is about the respect of personal data based on an individual's rights to privacy.
- The right to privacy is a ***human right***, and is a core value of Plan International as a rights based organisation.
- In order for Plan International to respect the right to privacy of staff and children and communities we work with we must be careful about how we collect, use, store and share personal data.
- There are laws in place across the world setting out how personal data should be handled. Plan International complies with the personal data laws of all countries it works in as well as best data privacy practices.

What is personal data?



- **Personal data** means any information that could be used, either alone in combination with other information, to **identify a particular individual**.
- It isn't always obvious. It may include, for example, an identification number (e.g. bank account, government identifier) or location data (e.g., address, geolocational data).
- Anonymised data is not personal data. It must be truly anonymised though to not be considered personal data. For example, giving each individual an ID number and keeping a separate record of which individuals the numbers belong to does not fully anonymise the data. This is because Plan International staff can still identify specific individuals from the data. Partially anonymised data can help reduce data privacy risks but it is still personal data.

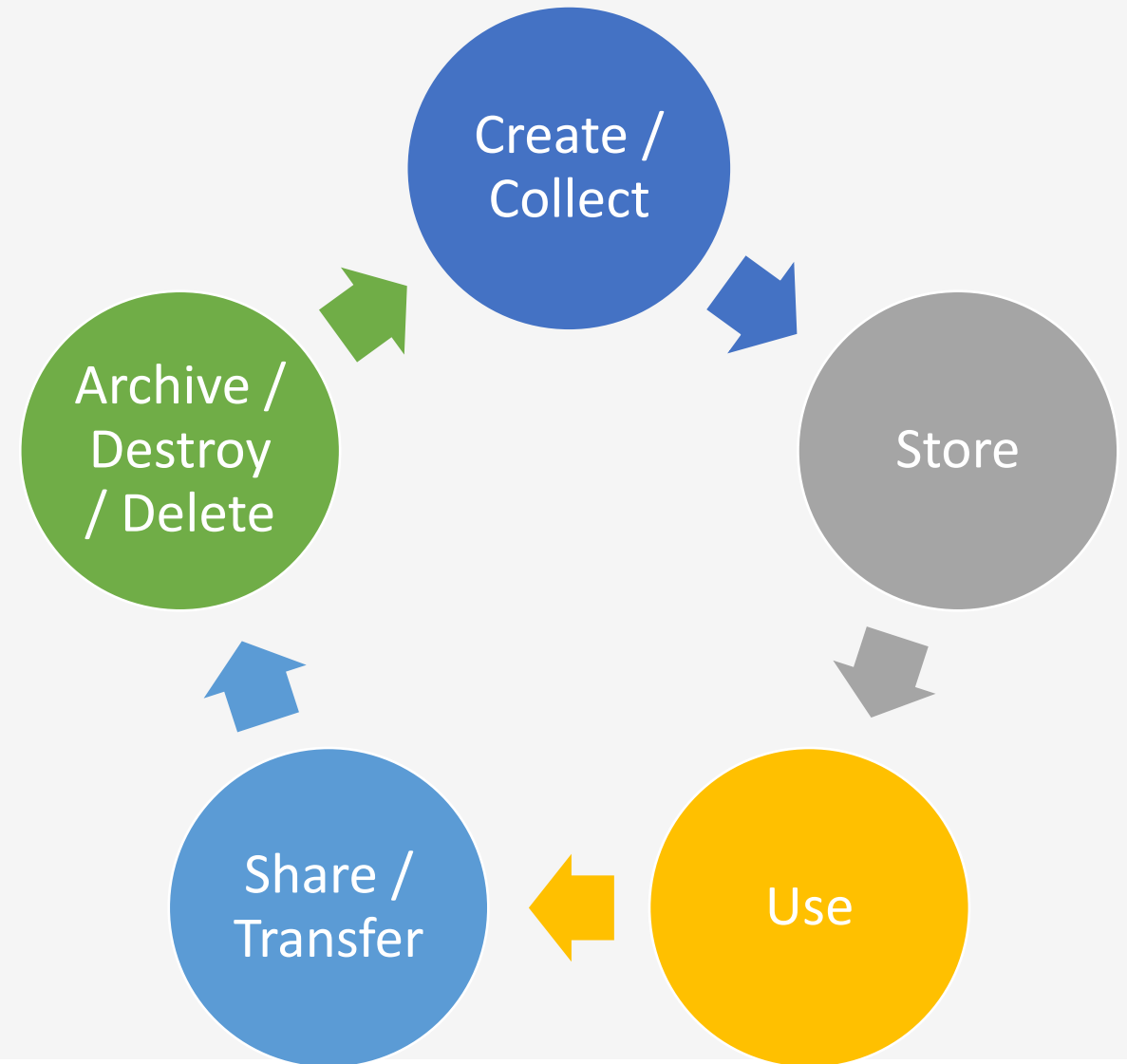
Special Category Data aka Sensitive Personal Data

Some countries and data privacy best practices distinguish ***special category data*** or ***sensitive personal data*** from regular personal data. As this personal data is more sensitive it requires a higher level of protection.

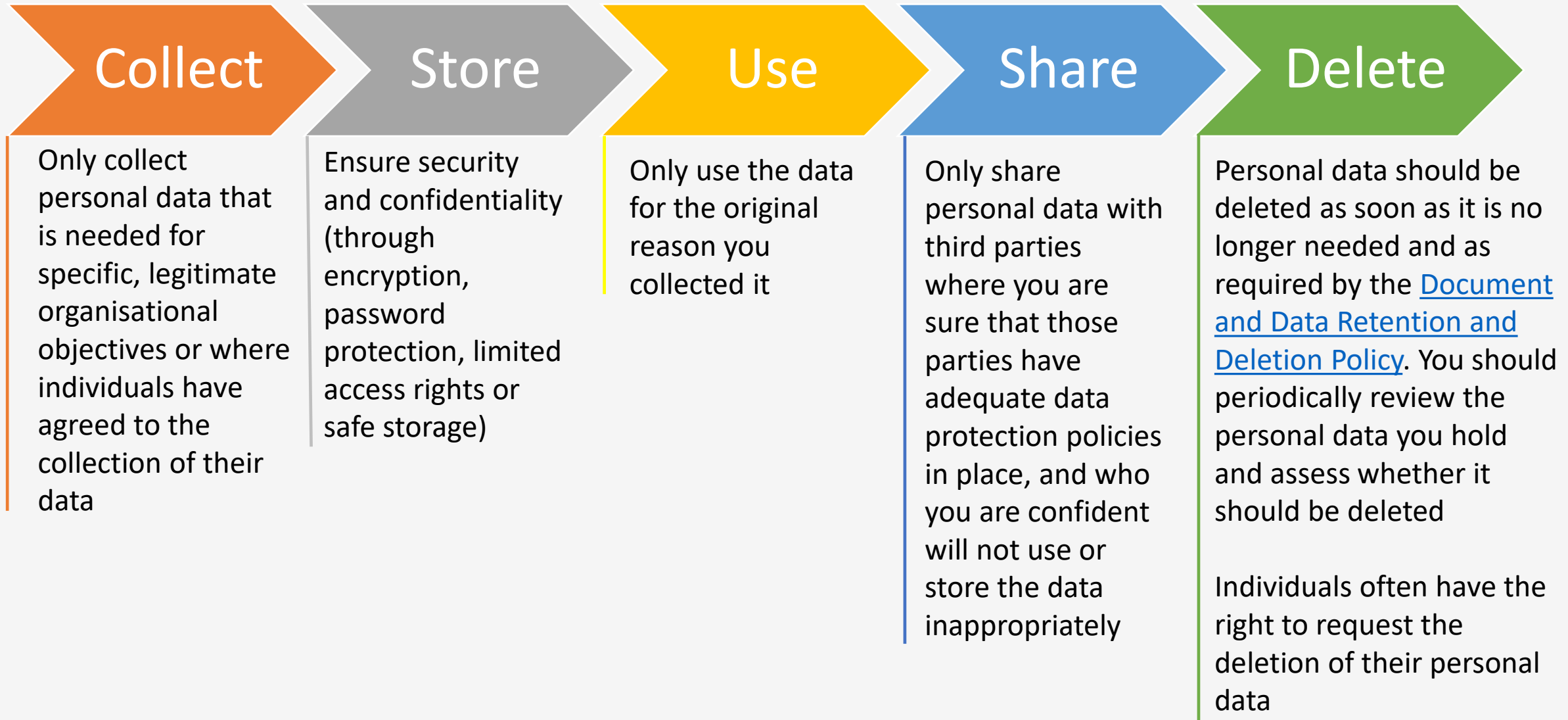
Examples of Special Category Data includes data on:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data;
- biometric data (where used for identification purposes);
- the health of an individual;
- a person's sex life; and
- a person's sexual orientation

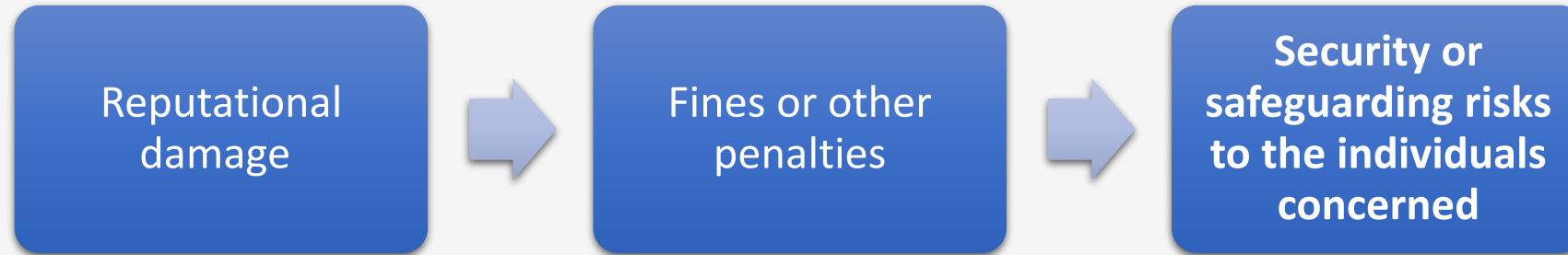
“Handling” personal data refers to almost anything that is done with personal data during the data lifecycle.



Personal Data Lifecycle – Data Privacy



Data Privacy Risks



Reporting any Data Privacy Incidents

Data Privacy Incident -

Any incident that involves:

- the attempted or successful unauthorized access to Plan International computer systems or databases, proprietary or confidential information, or personal data;
- the attempted or successful unauthorized use, disclosure, modification, storage, destruction or loss of proprietary or confidential information or personal data; or
- the loss of a Plan International computer or device containing proprietary or confidential information or personal data.

This includes both accidental and deliberate actions. It also means that a breach is more than just about losing personal data.

Examples of personal data breach

- A laptop with personal data on it is lost or stolen.
- A partner refuses to hand back or destroy Plan International's data.
- Files containing personal data are sent to the wrong person.
- Personal data is accessed and altered by someone without permission.

Link to the [Incident Management Process](#)

What is a Data Breach that needs to be reported?

Breach

- Leaving a folder with personal data of sponsored child on a train
- Sending personal data to another organisation without consent or legitimate reason
- Someone hacking Plan International's systems and accessing personal data

No breach

- Telling a friend that you are working with a local community
- Sharing personal data with a colleague who is working on a project the data may be used for and who needs the data to carry out their work

Consent to the collection of personal data

Do we always need consent?

Consent is one of the bases for handling data. It is very important in our work and most of our work with the children and young people we work with will require their consent to handle their personal data. There are also many situations where consent is required by law.

Consent is not the only basis for handling personal data, however. For example, some categories of personal data can be handled on the basis of a legal contract (such as an employment contract) or to further a legitimate interest of the organisation (which requires balancing that legitimate interest against the individual's interests, rights and freedoms).



Consent to the collection of personal data



Where Plan International relies on consent to handle personal data, consent must be **informed, specific and freely given**.

Individuals should know exactly **why** and **how** and **by whom** their data will be used.

1. Use clear, plain language that is easy to understand and child friendly where possible.
2. Tell individuals that they can withdraw their consent in the future if they change their mind (and act promptly on any withdrawals that are made!).
3. There should be no negative consequences to data subjects for not giving consent to the collection of their personal data. Where children cannot participate in a Plan International programme if they do not consent to the collection of personal data, careful consideration must be given to what the consequences are of them not participating, whether the personal data requested is necessary to deliver the programme, and whether a different basis for handling the data may be more appropriate.
4. Keep a record of when and how the consent was collected from the individual.

Data collected on the basis of consent can only be used in ways permitted by the consent given!

Children and Consent to Handle Personal Data



- In general, a parent or guardian must consent to any collection by Plan International of Personal Data about individuals younger than 18 years old.
- However, there may be instances in which it is appropriate to lower this age. In such cases, Plan International must always obtain assurance that the individual is capable of providing informed consent and ensure that the consent is fully informed and freely given.
- In no case can personal data be collected for a child 13 years or younger without the consent of a parent or guardian.
- Don't forget to check local legal requirements.

Available Tools & Support



Data Privacy Impact Assessment (DPIA)

A Data Privacy Impact Assessment (DPIA) is a tool to help assess the data privacy impacts of new projects or work activities.

A DPIA should be carried out before implementing a new (or making a change to an existing) handle, system, project, or work activity which may have data privacy impacts.

When to create a DPIA

A DPIA should be carried out at the early stages of a project to allow privacy considerations to be considered throughout the design of the project.

Link to the DPIA Template

[Data Privacy Impact Assessment Template](#)

Data Privacy Policy



Plan International has a [Data Privacy Policy](#) that applies to all offices of Plan International, Inc.

There are also data protection laws in many countries and these must be understood and followed.

Where local legal requirements impose additional requirements, you must follow these as well as the Data Privacy Policy. Where there is no applicable law on data privacy, you must still follow the Plan International Data Privacy Policy.

Data Privacy and Policies – key takeaways



Collect, use and store as little personal data as possible and share only when permitted and necessary (and delete when possible)

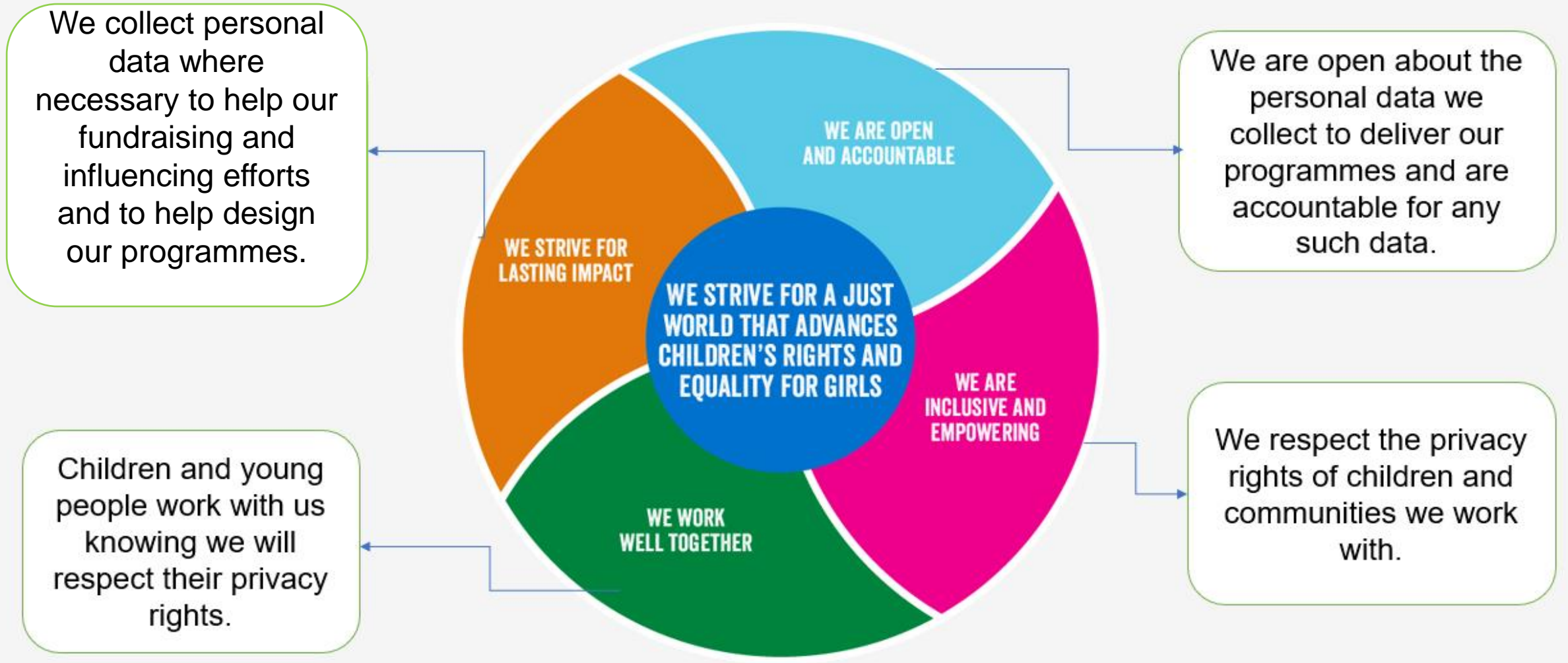
If a project or system will involve handling personal data, plan ahead

Key Lessons

Check applicable laws

Report any breaches!

Alignment with Plan's Values and Behaviours



Data Privacy Quiz & Scenarios



Data Privacy Quiz



Data Quiz

Scenarios



Data Scenarios

Further information or useful links



Data Privacy Policy

Data Privacy Policy can be found [here](#).

Contact Us

Reach out to Data.Privacy@plan-international.org for any further information.

Further information about the Data Privacy compliance tools and colleagues who can support can be found on the [Planet](#). Alternatively reach out to GHLegalteam@plan-international.org.

Think Privacy!



Thank you!

A decorative graphic featuring several gold stars of various sizes scattered around the text. Below the text is a thick, gold, hand-drawn brushstroke that curves under the words.