



Data management and privacy policy

Pact Cambodia



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Abbreviation

CoP	Chief of Party
CSV	Comma-separated values file
DCoP	Deputy Chief of Party
DHIS2	District Health Information System
HQ	Head Quarter
HR	Human Resource
ID	Identification
MEL	Monitoring Evaluation and Learning
M&E	Monitoring and Evaluation
PII	Personally Identifiable Information (PII)
R&M	Result & Measurement
RDQA	Routine Data Quality Assessment
SNN	Social Security Number
SOP	Standard Operating Procedure
UK	United Kingdom
USAID	United States Agency for International Development
WE Act	Woman Entrepreneur Act
YWE	Young Woman Entrepreneur

I. Purpose:

This document has three main purposes:

- Serves as a policy to protect personal information (PI) of project beneficiaries;
- Clarify the Standard Operating Procedures (SOPs) for the data collection; and
- Clarify the framework for the WE Act data use plan.

The document is divided into six sections. Section II (page IV) covers the PI privacy policy which will be applied to all Pact Cambodia projects. The rest of the document (SOPs and Data Use Plan on page III and on page VIII) are applicable to the WE Act project specifically.

Policy statement

Pact Cambodia has set out this policy to ensure the sensitive data collected will adhere to the three main concerns:

- **Confidentiality:** to ensure only authorized people have access to the data collected and manipulated at different operational levels;
- **Integrity:** safeguarding the accuracy and completeness of information and processing methods;
- **Availability:** ensuring that information and associated services are available to authorized users when required.

Access to data for authorized users should comply with all the legal and ethical requirements until the time the data is supposed to be disposed of regardless of its media and/or form of collection or storage. The document will be effective from January 15, 2020 onward; and will be shared to all implementing partners.

II. Beneficiary personal information privacy policy

The following PI privacy policy is applicable to all Pact Cambodia projects. Pact Cambodia respects the privacy of its beneficiaries¹ and recognizes the need for appropriate protection and management of PI. Pact contextualized the global data privacy policy of AVENT² to create this data privacy policy because its principals are fit with the context of Pact project. Hence, Pact decided to use AVENT's seven key principles in processing PI protection:

1. Clear notice to beneficiary
2. Offer a choice to beneficiary
3. Transparency and Accountability for onward transfer
4. Data Storage and data security
5. Data Integrity and Purpose Limitation
6. Access to beneficiary PI
7. Recourse, Enforcement and Liability

Personal information or Personally Identifiable Information

means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual." PII examples include name, address, social security number (SSN) or identification card (ID), mother's maiden name, date of birth, place of birth, driver's license number, medical records or medical record number, telephone number, business profile, social media account and email address. PII can also consist of a combination of indirect data elements such as gender, race, birth date, geographic indicator (e.g., zip code), and other descriptors used to identify specific individuals.

- 1. Clear notice to beneficiary:** When collecting PI directly from beneficiaries, Pact and its grantees provide a clear and appropriate notice about the;
 - Purpose for which it collects and uses their PI³
 - Types of stakeholder to which Pact or Pact grantees may disclose that information, and
 - Choices and means, if any, Pact or Pact's grantee offers individuals for limiting the use and disclosure of their PI.

Pact allows grantees to use their own notice statement with their project beneficiaries or use the Pact's notice statement to document the agreement for PI use between beneficiary and Pact.

- 2. Offer a choice to beneficiary:** Pact offers individuals a choice regarding how Pact processes PI, including the opportunity to choose their information for further processing based on the project needs. However, the consent from individuals is not required when processing PI for:

- Baseline/Mid/End line report
- Regular project quarterly/annual progress report

¹ Any target male and female who benefit from the project implementation activity whether via Pact or grantee and share personal data with the project

² <https://www.avnet.com/wps/portal/us/about-avnet/data-privacy-policy/>

³ <https://www.itgovernance.eu/blog/en/the-gdpr-what-exactly-is-personal-data>

3. Accountability for onward transfer: In regards to transferring information to donor or other entity (example to USAID's Development Data Library⁴); Pact takes reasonable and appropriate steps to;

- Transfer such PI only for specified purposes and limits consultant and donor use of that information to those specified purposes,
- Obligate consultant, grantee or donor to provide at least the same level of privacy protection as is required by this Policy or Pact assess the availability of data privacy policy before partnering or provide funding support to grantee,
- Help ensure that the consultant, grantee, or donor effectively processes the PI in a manner consistent with its obligations under this Policy,
- Require the consultant, grantee, donor, and other receivers to give notice when it is determined it can no longer meet its obligation to provide the same level of protection as is required by this Policy, and
- Upon notice from the consultant, grantee, donor or other receiver, take further steps to stop and remediate any unauthorized processing.

4. Data storage and data security: Pact takes reasonable and appropriate measures to protect PI from loss, misuse and unauthorized, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the PI. Pact will ensure high security of PI by using a password to access data (Pact excel standard template and DHIS2 database). Pact will store data in its the cloud-based filing system, Box, this will allow only limited access to some position only.

Box is also committed to securing PI and takes appropriate technological and organizational measures to help protect PI from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Box complies with applicable data protection, privacy, and security breach notification laws.

Some of the ways in which Box protects PI include:

- Encryption of content when it is stored at rest in our data centers;
- Protection of sensitive information with encryption during transmission over the public Internet;
- Keeping the servers on which PI is stored in a controlled environment with limited access;
- Maintaining a wide variety of compliance and security programs.

⁴ <https://data.usaid.gov/>

Any related file or folders with PI will be protected with a strong password to protect all sending and receiving via; email and other social media tools such as line, Telegram, Facebook messenger and Instagram etc. Failure to take immediate action or knowingly ignoring this policy and related resources will be subject to disciplinary action accordingly to HR policy for all Pact staff code of ethics section #6: Use of Pact's equipment, time, name, information and others asset (section d: confidentiality)

5. Data Integrity and Purpose Limitation: Pact only processes PI in a way that is compatible with the purpose for which it has been collected or subsequently authorized by the individual. Pact shall take steps to help ensure that PI is accurate, reliable, current and relevant to its intended use.

6. Access to beneficiary personal information: Pact provides individuals with reasonable access to their PI for purposes of updating information that ties to the PI such as: correcting, amending or deleting that information where it is inaccurate or has been processed in violation of the Pact data privacy principles.

Pact allows a limited number of positions to access PI such as; Country Director, CoP, DCoP, and MEL Manager, Entrepreneurship Manager, and Civic Engagement Advisor, programs officers, MEL Officer, Provincial Coordinator and grantees staff (Executive Director or M&E focal staff) who have roles to enter and/or analyse data.

7. Recourse, Enforcement and Liability: Any violation of this Policy by staff, grantee, or contractor of Pact will result in appropriate discipline up to and including termination. Violation by an grantees, stakeholders or other third party of this Policy or Pact's privacy requirements will result in the exercise of appropriate legal remedies available at law or in equity including termination for material breach of contract.

III. Standard Operating Procedure (SOPs) for WE Act

WE Act project uses the web-based, password-protected District Health Information Software 2 (DHIS2⁵) database to store all project beneficiary data. The following section outlines the basic SOPs for WE Act team (Pact and partners) to follow when collecting, storing and sharing data.

1. Data collection at the ground level (paper and electronic)

Grantee focal staff will collect data at the activity level using WE Act standard collection forms,

⁵ An open source, web-based health management information system (HMIS) platform. Used to collect, manage and analyze data, both aggregate counts and individual level tracking Customizable to meet project needs!

these are the “event detail” and “enrollment form”.

2. User access management

BAO is a DHIS2 system developer based in the UK and worldwide responsible for all software adaptations to DHIS2 responsible to create user accounts for all personnel levels (needs-based) upon approval of the CoP and DCoP. However, in the future Pact will take on this role, managing all this user access internally from HQ. User roles are categorized as follows:

- **System administrators:** users with full access to the system; includes ability to develop new data collection tools, manage user accounts, and data analysis
- **Data administrators:** users with access to perform data reviews, clean, and download data for further analysis.
- **Data clerks:** users with mandate to perform data entry as per their assigned geographical locations and/or organizations

First Name	Last name	Position	Role of users
Sabine	Joukes	Chief of Party	System Administrator
Zach	Center	Deputy Chief of party	System Administrator
Chhork	Boeurng	MEL manager	System Administrator
Sunnarith	Chrea	MEL officer	Data administrator
Lody	Peng	Entrepreneurship Manager	System Administrator
Vuthoun	Khiev	Civic Engagement Advisor	System Administrator
Ousopha	Prak	Entrepreneurship Program Officer	Data entry clerks
Sokhemary	By	Civic Engagement officer	Data entry clerks
Prom	Sean	Provincial Coordinator	Data Administrator

3. Data entry devices management

Pact is responsible for giving advice to grantee of devices to be used for data entry. Currently Samsung tablets **SAMSUNG Galaxy Tab A** are used for data entry due to its good features;

- High performance RAM 3GB, Chipset is the latest version and big battery 7300 MAh,
- Screen touch technology smooth than other and big screen easy to use,
- Easy to upgrade firmware (OS).

The number of devices per grantee will depend on their overall target of YWEs to be reached. Pact will manage device account (cloud) in order to provide protection if the device is stolen.

For DHIS2, the data entered on the apps on a tablet goes directly to the system and is then off the phone when online. However, to ensure security when/if the offline capability is use all devices

must be protected through the use lock-codes. It is also best practice that staff and partners log out of Tracker/Event apps on the tablet when not in active use.

4. Data entry

The grantee MEL focal person is responsible for entering all data collected using a mobile app and data will be entered directly into DHIS2 using tablets/computer web-based browser provided by WE Act MEL team. The grantee MEL focal person can use the WE Act standard Excel spreadsheet to enter data and email this to the Pact grant team quarterly to these two email address: lpolin@pactworld.org and cchakriya@pactworld.org. As Pact now in the progress of testing the data collection flow with grantee, learning from this testing process, Pact and Pact grantee will select the quicker way of data entry in the future.

5. Accessing Data

Electronic file

Access to WE Act reports will be provided to all leaders (CoP and DCoP) and managers for monitoring, analysis and reporting needs. At grantee level, the grantee M&E focal person and Executive Director can view the result of their performance only and will have any access to personalized data.

To access electronic file, the database user must have a username and a password which are given by the administrator at Pact Head Quarter (HQ). Every user will have their specified access rights and level will determine what they can do in the database. The levels include the following: Data Entry /Update, Report module, Data Analysis, System administration, etc.

Hard copy file

At grantee level, the MEL team/focal person will be responsible for safe keeping of the hard copy file which will be used for verification during Routine Data Quality Assessment (RDQA). In addition, grantee will be required to send scanned versions of supporting documents to Pact grants team email address lpolin@pactworld.org and cchakriya@pactworld.org. The grants team will then forward to MEL team the Pact MEL team will be responsible to keep the soft copy (PDF file) for future RDQA.

6. Data locking

Pact MEL manager will be responsible for locking data in the database on the 20th of the following month, or the closest business day proceeding, after the reporting period ends, disabling it from further cleaning and editing before data analysis and reporting.

7. Data analysis

Data analysis plan

The DHIS2 system developer are working with R&M team and WE Act MEL team to prepare the data analysis plan. The data analysis plan is designed to address the program's monitoring and evaluation needs, clearly specifying the key indicators to be tracked, indicator definitions, reporting timeline and report recipients. Once this plan is completed this policy will be updated as necessary.

Data processing for analysis

The MEL officer will be responsible for data preparation for analysis. Data preparation for analysis will include:

- **Individual level data removal:** removal of all data elements which could potentially allow anyone accessing the data for analysis to identify the beneficiary. The data elements include but are not limited to names and phone numbers.
- **Specific periods data filtering:** submission of data as per specified reporting period. This will also ensure only locked data sets are used for analysis and reporting

8. Backup

Back-up software

- **Incremental backup:** this will include daily data back-ups as data entry is done. All incremental data backups will be done online by exporting from the system and saving in Box.
- **Full back-up:** at the end of each reporting quarter, after data cleaning for the given quarter a full back-up will be downloaded, locked and backed up for reporting and other future use.

Backup media and file naming

Quarterly backup files will be electronically kept in a shared central Box folder, on external hard drives and lock in the safe IT room. Data files for each quarter should be titled in a format "Back-up date_project/Year_quarter Number_formName" e.g.

2019_05_22_Y2_Q1_Event Detail.

All data should be backed up in comma-separated values file (CSV) formats in zipped folders.

9. Data Sharing to Public

Currently, each department in Pact Cambodia adopted their individual internal policy (sharing data) plus the compliance to various donor policy such as ; Information Technology, Finance/Admin, Human Resources, grant management and communication etc... Therefore, before sharing any kind pact and pact's relevant documents to whether internal pact and to outsiders such as hard copy, electronic copy, staff should discuss with each department manager for their advice.

10. Data retention policy

WE Act program collects data at different levels. Data collected includes sensitive information of individuals such as YWEs, Youth Leaders, etc. The objective for our data retention policy is to explicitly provide guidelines on the period that data collected should be kept, model of data storage and ways for disposing information collected.

Scope

The data retention policy applies to all information and data collected for the project in all forms and media types including paper based, electronic, text, audio, video etc. All program and non-program individuals who might have access to the data collected are required to fully observe the guidelines under this policy.

Data retention period

The Grantee office will be the first level of data storage and retention. During data entry, the Grantee will allow MEL focal staff access to the data collection forms for a period of maximum one day per form. No M&E focal staff should be allowed to take away the form outside the grantees' selected data entry premises.

After data entry, all paper-based forms will be stored at the grantee offices for a maximum of three years after project end for data quality and data validation concerns.

The second level of data storage and retention is the WE Act MEL team. Data storage at the second level will only be in electronic formats. Only authorized people should have access to the central repository keeping all data entered at the grantee level. All downloaded data should only be processed and stored on the official Pact data site called Box. Staff with authorized access are not allowed to process, store and/or transfer data using unauthorized Pact devices.

Data stored on staff computers should only be accessed on the shared MEL box. Electronic data for each quarter and/or project year should be stored for access for a maximum of three years after project ended.

Data disposal:

Beyond the defined data retention period in above section; all data should be disposed.

- **Paper based data disposal:** paper- based data disposal should be done by shredding all the paper forms used and securely shredding the pieces in adherence to environmental protection requirements
- **Electronic data disposal:** beyond the defined period of electronic data access, all electronic data should be deleted from all devices used for data storage, processing and/or transfer.

IV: Data use plan for WE Act

Using DHIS2 database, individual level data is routinely reviewed and analyzed at all levels by assigned staff of Pact to facilitate informed and evidence-based decision-making by Country Director/ CoP and DCoP to improve program quality and performance. The project invested in developing standard operating procedures (SOPs) for data collection, analysis, visualization and dissemination for use by project and grantee staff and plans to conduct training to them on simple data analysis, visualization techniques, and best practices.

The project staff will coach and mentor grantee’s focal staff to select key performance indicators based on the work they are doing for the project, understand indicator definitions and interact comfortably with DHIS2’s built-in data visualization features to create and display charts in their offices showing progress against targets and trends of service delivery. Grantee’s focal staff will also be guided on how to use data to inform decision-making through planning meetings and program management. Data will also be shared back with partners and beneficiaries based on data use plan

Data Source	Format	Frequency	Audience	Dissemination Channel	Primary purpose	Responsible; How specifically is it used?
Overall Project						

Data Source	Format	Frequency	Audience	Dissemination Channel	Primary purpose	Responsible; How specifically is it used?
Baseline/ Mid/Endline	Hard/soft copy (Ms.Word)	-Mar 2020 -July 2021 -May 2023	-Ecosystem actors -Donor (USAID) - Beneficiary	Baseline/ Mid/Endline report is presented to USAID published in 2-3 pager summary hard copy. Results also used in Ecosystem actor forum when relevant	Evaluation	CoP & MEL manager To understand whether the project is having an impact and to adjust program activities to findings
APEA Assessment Report	Hard/soft copy (Ms.Word)	One time (1-2 months when assessment completed)	-WE Act team -Grantee -Ecosystem actors	Published - Leaflet, booklet, brochure	Use the finding to inform or tailor the WE Act project methodology/approaches	DCoP and Com Manager To understand the key finding of the APEA report and how it related to current WE Act intervention
Micro APEA-h.	Hard/soft copy (Ms.Word)	One time (1-2 months when assessment completed)	-WE Act team -USAID -Grantee -Ecosystem actors	Published - Leaflet, booklet, brochure	Use the finding to inform or tailor the WE Act project methodology/approaches	DCoP and Com Manager To understand the key finding of the APEA report and how it related to current WE Act intervention
Private sector Landscape Assessment	Hard/soft copy (Ms.Word)	One time (1-2 months when assessment completed)	-WE Act team -	internal report	Use the finding to inform or tailor the WE Act project methodology/approaches	CoP, DCoP and Entre Manager: To understand the key finding of the Private sector landscape report and how it relates to current WE Act

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Overall Project						

Data Source	Format	Frequency	Audience	Dissemination Channel	Primary purpose	Responsible; How specifically is it used?
						intervention; identifies potential partnership opportunities
Financial Landscape Assessment	Hard/soft copy (Ms.Word)	One time (1-2 months when assessment completed)	-WE Act team - Beneficiary -USAID -Grantee -Ecosystem actors	Published - Leaflet, booklet, brochure,	Use the finding to inform or tailor the WE Act project methodology/approaches	CoP and DCoP To understand the key finding of the Financial landscape report and how it related to current WE Act intervention; Identifies key gaps and opportunities for WE Act to enable better access to finance for YWEs
DHIS2 database	Excel	Quarterly	-COP -DCOP -Managers -Officer -MEL -Donor	Program Team receives the data and sends feedback.	To understand current status on indicators feedback and set new methodology and approaches to the current implementation	MEL Manager and officer: Managers look at the data against targets and use the information to make any necessary program changes.
Outcome Mapping	Hard/Soft (Ms.Word)	One a year	COP -DCOP -Managers -Officer -MEL	Program Team receives the data and sends feedback	To understand progress toward outcomes	Program team: Manager look the Outcome Mapping result and use data to understand progress toward key outcomes and any project adjustments needed

Data Source	Format	Frequency	Audience	Dissemination Channel	Primary purpose	Responsible; How specifically is it used?
I TOCA	Hard/Soft (Ms. Word)	One a year	-COP -DCOP -Managers -Officer -MEL -Grantee	Program Team receives the data and sends feedback	To understand the current capacity of grantee and use information to set up the capacity building plan	Program team: Manager look the Outcome Mapping result and use it the capacity building plan

V. References

- Pact data management policy
- WE Act MEL plan
- AVNET Global Data Privacy Policy
- IT governance European Blog

VI. Appendices

- Consent agreement form

Approval



Sabine Joukes
Country Director, Pact Cambodia