Terre des hommes and the GDPR

Agenda

- Terre des hommes’ institutional approach
- The Data Protection Working Group
- The Data Protection Officer in Terre des hommes
- The Directive of Data Protection in Operations
- DPIA, Policy, and other initiatives
- The Data Protection Starter Kit
Terre des hommes’ institutional approach

- Terre des hommes (Tdh) is based in Switzerland but operates in nearly 40 countries
- Some of the countries where Tdh operates are in the European Union (Hungary, Greece, Romania)
- Tdh works with parts of the population that can, at times, be considered very vulnerable
Terre des hommes around the world
The Data Protection Working Group

• An **internal working group** on **data protection** was set up at the **beginning of 2017** in order to coordinate work on data protection within Tdh

• It includes people from **many different departments**

• The task of the working group is to **advise the organisation** on the actions to be taken for data protection
The Data Protection Officer in Terre des hommes

- **As the GDPR came into effect**, Tdh has **nominated a DPO internally**
- Beside the normal tasks, in Tdh the **DPO also coordinates the Data Protection Working Group**
- The Data Protection Officer in Terre des hommes can be contacted at **dpo@tdh.ch**
The Directive of Data Protection in Operations

- At the end of 2017, the Data Protection Working Group of Tdh elaborated a Directive document for Data Protection in Operations.
- The Directive was approved by the Committee of Directors in May 2018.
- The Directive includes 11 principles to respect when working with data in Terre des hommes.
- The 11 principles include: proportionality, informed consent, necessity, anonymisation, etc.
DPIA, Policy, and other initiatives

- Terre des hommes is about to undertake a Data Protection Impact Assessment exercise in preparation for the future Data Protection policy that will reflect the guidelines for the organisation to respect the GDPR.

- The Data Protection Policy is planned for 2019 and it will be drafted in synergy with the development of delegation-level SOPs based on specific templates prepared in the framework of the “Data Protection Starter Kit” project.
Data Protection “Starter Kit”
The “Data Protection Starter Kit” was developed as many staff at Terre des hommes felt the need for guidance and advice on a wide set of practical issues in order to ensure proper data protection for beneficiaries.
What is the Data Protection Starter Kit

A set of tools, and tutorials help people understand and improve data protection practices in the field

Tdih made available for other organisations:

• An overview document on data protection
• A tool for the Auto-evaluation of your data protection practices,
• Tutorials for your teams on several key aspects that can help improving data protection
How to access the material

You can find the Data Protection Starter Kit material and the tutorials at the following link:

How to use the Data Protection Starter Kit

1- Read the data protection starter guide

Inside you will be able to find general principles and information on data protection as well as information on roles and responsibilities for Tdh delegations
How to use the Data Protection Starter Kit

2- Get familiar with the concepts of “risk”, “harm”, and “threat”

By reading the related guidance sheet you can understand what these different terms mean specifically for data protection.
Key definitions to assess data protection

**Harm** signifies any damage, injury or negative impact - whether tangible, intangible or economic - that can be a result of the processing of data. It includes any denial of fundamental rights and freedoms. Harm can affect individuals, groups of people or organizations.

**Threats** are anything that can potentially cause harm, either intentionally or unintentionally. This includes losing data, sharing data with unauthorized parties or collecting/using data without permission.

**Risks** correspond to the intersection of harm and threat and describe the **likelihood** and **impact** of a harmful event (threat) occurring.
How to use the Data Protection Starter Kit

3- Assess your level of data protection using the self-assessment tool (for Kobo)

Read the guidance paper to find out how to install and use the self-assessment tool. Tdh recommends the exercise to be conducted in a group.
How to use the Data Protection Starter Kit

4- Once you have identified your risks and threats in terms of data protection, define actions to mitigate them.

Use the set of 12 tutorials developed by Tdh and CartONG to assist you with this task.

Tutorials Pack

The tutorials pack is composed of tutorials that can help the users to secure the ways they work with data.

- 2.01. How to choose, store and organise your passwords
- 2.02. How to share your passwords within your organisation
- 2.03. How to encrypt files and folders that contain sensitive data
- 2.04. How to share your files that contain sensitive data through email or cloud
- 2.05. How to create databases that contain sensitive data
- 2.06. How to pseudonymise or aggregate the data prior to sharing
- 2.07. How to protect your mobile device - Level 1 (basic principles)
- 2.08. How to protect your mobile device - Level 2 (very sensitive contexts)
- 2.09. How to do your mobile device’s maintenance
- 2.10. How to permanently delete data from your device
For Terre des hommes delegations...

5- For Tdh delegations also a set of template SOPs were developed to clarify and formalize roles and procedures

**TEMPLATE SOPs**

This pack include template of SOPs that can be adapted by the delegations according to their needs:

- 3.01_ (version 0) _SOP_template_Manage and change your passwords
- 3.02_ (version 0) _SOP_template_Back up, archiving and destruction of your sensitive data
- 3.03_ (version 0) _SOP_template_Usage of portable devices (USB key, external hard drive...)
- 3.04_ (version 0) _SOP_template_Configuration of a KoboToolbox account for mobile data collection at delegation level
- 3.05_ (version 0) _SOP_template_Sharing of sensitive data internally and externally
- 3.06_ (version 0) _SOP_template_Working collaboratively on sensitive documents
Any questions?
Thank you!!