

ISEAL Data Policy: Data related to Community Member and compliance requirements

Version 1, Effective 2 November 2020

1. Introduction

In the course of working with applicants and ISEAL Community Members to support them in demonstrating their adherence to the *ISEAL Community Member Requirements*, or *ISEAL Code Compliant Requirements*, or *ISEAL Accreditation Member Requirements*, ISEAL commits to protecting data shared with ISEAL. In particular, ISEAL takes steps to minimise the risk of data being used incorrectly or accessed inappropriately by:

- 1.1. Storing data in secure online systems
- 1.2. Keeping data only for as long as is necessary
- 1.3. Using data only as outlined in this policy or with the explicit consent of the owner of the data
- 1.4. Sharing data only as outlined in this policy or with the explicit consent of the owner of the data
- 1.5. Ensuring staff and third parties with access to data use it in alignment with this policy
- 1.6. Ensuring only ISEAL staff have access to the data that ISEAL stores. When in the course of ISEAL's work, third parties need access to data, only the specific data they require is shared with them and only for the duration of this work.
- 1.7. Ensuring ISEAL staff with access to this data and third parties with whom this data is shared are bound by contracts which require them to keep information confidential.
- 1.8. Ensuring that ISEAL protects the confidentiality and security of any personal data shared with ISEAL by implementing appropriate technical and organisational measures in accordance with the applicable data protection law.

2. Scope

This policy only applies to data shared with ISEAL by members or applicants in accordance with the *ISEAL Community Member Application Procedure*, *ISEAL Community Member Monitoring Procedure*, *ISEAL Independent Evaluation Procedure*, *ISEAL Accreditation Member Compliance Procedure* and *ISEAL Complaints Procedure* which describe how ISEAL validates that members meet *the ISEAL Community Member Requirements*, *ISEAL Accreditation Member Requirements* and *ISEAL Code Compliant Requirements*.

3. Data Use and Processing

- 3.1. ISEAL will process and aggregate data so as to monitor, review and improve the efficacy of its strategies, e.g., for reviews of ISEAL's Codes of Good Practice, planning activity for the Communities of Practice, applying for donor funding, conducting monitoring and evaluation, etc.
- 3.2. In order to validate the requirements of ISEAL Community Member, Accreditation Member and Code Compliant status, evaluators appointed by ISEAL will sometimes change the format of the data provided and use the data to produce their assessment of how well the requirements are met.

4. Data Sharing

- 4.1. In line with the *ISEAL Community Member Requirements* and *the ISEAL Community Member Monitoring Procedure*:
 - a) Individual member improvement plans, member progress reports, and member system overviews will be shared with all other ISEAL Community Members
 - b) Individual basic scope and reach data, status of participation in the compliance programme (i.e. assessed, not assessed) and allowed claims will be made publicly available
 - c) Individual system overviews for those participating in the compliance program will be made publicly available

These documents will not include personal data.

- 4.2. In line with the *ISEAL Independent Evaluation Procedure*, ISEAL will make member evaluation and review schedules and summary information from external assessments publicly available. This will not include personal data.
- 4.3. ISEAL will publicly disclose aggregated data where this supports monitoring, reviewing and improving the efficacy of ISEAL Community Membership and the compliance programme. This will not include personal data.
- 4.4. Individual member data will be shared with evaluators as required for them to conduct evaluations and all information shared with them is treated as confidential. Evaluators are contractually obliged to:

- a) Keep the confidential information secret and confidential and not directly or indirectly disclose or permit to be disclosed, make available or permit to be made available the same to any third party for any other reason without the prior written consent of ISEAL and the individual member concerned
 - b) Not copy, reproduce, or otherwise replicate for any purpose or in any manner whatsoever any documents containing confidential information nor any of the confidential material itself without the express prior consent of ISEAL and the individual member concerned
 - c) Only hold shared data for the duration of this work.
- 4.5. Data will also sometimes be included in funding proposals and M&E reporting submitted to donors, where this information is needed to meet donor requirements.
- 4.6. ISEAL may sometimes need to share data in other situations. When this occurs, data will be aggregated and anonymised and the data will only be used to enable ISEAL to better meet members' needs. This will not include personal data.

5. Legal Requirements

- 5.1. ISEAL may sometimes be required to make disclosures to the Charity Commission or other official bodies. When this occurs ISEAL will notify affected members and limit these disclosures to the specific data required.
- 5.2. ISEAL will only keep data for as long as it is required to do so either to use the data for its work or in order to meet statutory requirements.