



Policy Document

PRIVACY POLICY

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Policy Responsibility	Data Protection Lead
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Version	Date	Author	Notes
1.0	January 2018	Dave Rorke-	
2.0	January 2020	Operations Officer	
3.0	October 2024	Senior Operations and Programme Officer	Individual Rights; Role of Data Protection Lead

Relevant Policies:

1. Data Protection Policy
2. Privacy Notice
3. Code of Conduct

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Purpose

As The Duke of Edinburgh's International Award ("the Award"), is a global youth achievement programme for young people aged 14 to 24, Saksham Yuwa Nepal, the National Award Operator (NAO) of the Award in Nepal is committed to protecting the personal and sensitive information of all individuals associated with the Award.

This policy aligns with international privacy laws and standards to ensure the rights and privacy of all individuals in the Award in Nepal.

Definition

Award Staff: paid and volunteer staff working for and/or with the Award in Nepal. This includes, but is not limited to, NAO staff, National Board, Operating Partner's staff, Award Leaders, Award Coordinators, Assessors, and Activity Coaches.

Personal Information: data related to an identified or identifiable individual, including name, contact information, and other identifiable details.

Sensitive Information: includes health details, racial or ethnic origin, political opinions, religious beliefs, sexual orientation, criminal records, and biometric data.

Data Processor: third parties that process personal information on behalf of the NAO, bound by contractual obligations to adhere to this policy.

Scope

This policy applies to all individuals and entities involved with the NAO, including:

- Staff, volunteers, board members, contractors, and consultants.
- Program participants (Award Leaders, trainers, Award Coordinators, and facilitators).
- Partner organizations and their staff.
- Donors, sponsors, and supporters.
- Any individual representing the NAO in any capacity.

Individual Rights

- **Right to Access:** Individuals may request access to their data, and the NAO will provide it within 30 days. Verification measures are taken to ensure the requestor's identity.
- **Right to Correction:** Individuals may request corrections to inaccurate or incomplete data.
- **Right to Erasure (Right to be Forgotten):** Individuals may request deletion of data in specific circumstances, such as withdrawal of consent or when data is no longer necessary for its original purpose.
- **Right to Object and Restriction of Processing:** Individuals can object to data processing based on personal circumstances or restrict processing to certain purposes.

Policy Statement

Collection of Information

- Award Staff must take reasonable steps to implement practices, procedures, and systems to ensure all individuals associated with the Award in Nepal comply with this policy and is able to deal with inquiries and complaints from individuals.
- Award Staff must only collect personal information that is necessary for one or more of its functions or activities. Only data necessary for the Award's functions will be collected, processed, and retained, in line with the principle of data minimization of the International Award Foundation ("the Foundation")
- Personal information must be collected lawfully and fairly, e.g. not in an unreasonably intrusive way. Award Staff will generally collect personal information in order to manage, administer, record, and support participation in the Award. Information is also collected to keep employees, volunteers, supporters, and participants informed about Award activities and events.
- When or before collecting personal information, Award Staff must take reasonable steps to ensure the individual is aware of the identity of the collecting organisation, contact details, the purposes for which the information is required, and to whom it will be provided.
- Award Staff must collect personal information directly from the relevant individual or their authorized intermediaries, unless unreasonable or impractical. Award Staff must take reasonable steps to ensure that when information is collected from a third party that the subject of the information has been made aware of this action.

- In certain circumstances, the Award Staff may collect sensitive information about individuals. For example, an individual may provide information on their health or racial origin. The Award only collects, uses and discloses sensitive information with consent.

Use of Information

- The NAO generally limits its use and disclosure of personal information to the purpose for which it was collected and other related purposes that would be expected by the individual.
- In special circumstances, Award Staff may also use and disclose personal information where it is otherwise allowed under the international privacy standards (for example, some circumstances relating to law enforcement, emergency situations, legal claims and suspected unlawful activity or serious misconduct).
- If Award Staff wish to use or disclose personal information in other circumstances, they must obtain the individual's consent to do so.
- Personal information may also be used to inform volunteers, supporters and Award participants of the trainings, Award ceremonies and other relevant events and ceremonies organized by the NAO.
- Individuals who no longer wish to receive such information may advise Award Staff. The Award's records will normally be amended in five working days.
- Personal information may be shared between the NAO staff responsible for administering the Award in Nepal. Each NAO staff agree to comply with this policy.
- Award Staff may also transfer personal information (including Sensitive Information) to the Award organizations located outside of Nepal such as the Foundation or other NAOs (for example delegate details including health information for international exchanges/camps). Individuals who object to the overseas transfer of their personal information may advise Award Staff. When disclosing personal information to third parties outside Nepal, Award Staff should have suitable controls in place with the foreign information recipients to ensure an appropriate level of privacy protection.
- Award Staff may also disclose personal information to its contractors and service providers that assist in the operation or administration of the Award from time to time. This strictly excludes for advertising or third party commercial activity.
- Award Staff must take reasonable steps to ensure that personal information they collect, use, or disclose is accurate, complete, up-to-date, relevant and not misleading,

Access to Information and Data Sharing

- Personal data may be shared with authorized Award personnel and operators who require access to fulfill their roles.
- Data may be transferred internationally to the Award Foundation under adequate data protection standards. Individuals are notified of such transfers and may object if they wish
- Third party vendors with access to data are contractually bound to comply with this policy and relevant privacy regulations, ensuring data security. We do not authorize third-party vendors to use personal data for advertising or commercial purposes.
- Data may be disclosed if required by law, for law enforcement, to prevent harm, or to protect the rights and safety of individuals involved with the Award

Security of Information

- **Access Controls and Authentication:** Only authorized NAO Staff have access to personal data, protected by multifactor authentication, role-based access, and regular audits.
- **Data Encryption:** Personal data, especially sensitive information, is stored in encrypted formats and transmitted over secure channels to prevent unauthorized access.
- **Data Retention and Deletion:** Data is retained only for as long as necessary for operational purposes or compliance with legal requirements. When no longer needed, data is securely deleted or anonymized.

Roles and Responsibility

- **National Board:** Responsible for policy approval, significant decision-making, and policy amendments based on new privacy laws or operational changes.
- **Data Protection Lead (DPL):** Monitors compliance, provides staff training, and serves as a contact point for regulatory bodies on privacy matters. Oversees the implementation of this policy, including handling inquiries, managing complaints, and ensuring staff adherence.
- **Award Staff:** Enforce and comply with policy provisions in their day-to-day activities. Report privacy breaches and ensure that individuals' data rights are respected

Policy Compliance and Enforcement

- **Complaint Handling:** Individuals may submit complaints regarding the handling of their data via report.doeianepal@gmail.com. Complaints will be reviewed by a Data Protection Lead (DPL), and resolutions will be communicated to the complainant.
- **Escalation Procedure:** If a complaint is unresolved, it may be escalated to the National Chair for review.
- **Regular Audits:** The Award will conduct periodic audits to ensure compliance with this policy and applicable data protection laws, reviewing data security protocols and access controls.
- **Training and Awareness:** Award staff receive regular training on data privacy responsibilities, data handling practices, and methods for securing sensitive information.
- **Breach Notification:** In the event of a data breach, affected individuals and relevant authorities will be notified as per legal requirements.

Monitoring and Learning from Complaints

The Data Protection Lead will be responsible to report to the National Board annually during AGM on issue raised under this policy and corrective actions required. These reports are to be reviewed annually to identify any trends, which may indicate a need to take further action

Effectiveness and Applicability

This Policy is reviewed at a minimum of once every three years and updated as required. It is effective as of the adopted date of December 4, 2024

Acknowledgement of Compliance

I am aware of my obligations as outlined in this Policy and I understand that as a National Board/NAO Staff/Award Volunteer, failure to comply may result in disciplinary action or termination of my involvement with The National Award Operator of Duke of Edinburgh's International Award in Nepal.

Name	
Role	
Award Center (if applied)	
Signature	
Date	