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## **RESPONSIBLE PROGRAM DATA POLICY**

### **I. GENERAL NEED STATEMENT**

Worldreader is on a mission to create a world where everyone can be a reader. We believe that digital technology, when combined with relevant content, smart programming, and strong partnerships, has the potential to improve the lives of billions of people.

Data is a valuable resource that has real, measurable impact on improving the quality and efficiency of our work and ultimately promoting social good, but it can also harm the communities we work with when not used responsibly. Worldreader is committed to using data responsibly while promoting a culture of reading around the globe. Through this responsible data policy, Worldreader commits to amplifying the positive effects of our work while attempting to reduce possible negative effects.

Worldreader is committed to upholding the rights of the individuals, groups and organizations with whom we work. Especially relevant to this policy are the right to be counted and heard; the right to dignity and respect; the right to make an informed decision; the right to privacy; and the right to not be put at risk.

For the purpose of this policy, we consider "data" to be all information that is collected, stored and shared about the projects and people we work with, including information that is provided to us by our partners. By "use of data," we mean the collection, storage, sharing, and publishing of data.

### **II. POLICY PURPOSE**

This policy outlines the treatment of programmatic data by Worldreader throughout the data lifecycle from planning to collection through the disposal of data.

This policy pertains to data from all our programs, funded by both restricted and unrestricted funds. It will apply to all aspects of the project and program cycle as well as research. This policy also applies to all the data we collect through our reading applications.

Worldreader will uphold this policy for all programs where Worldreader is the data controller and will ensure that all external individuals or organizations it works with during the data lifecycle (partners, contractors, etc.) comply with the policy.

This policy is designed to be forward-looking and prepare Worldreader for the future, establishing systems to enable the organization to be a truly data-driven organization. Data is a valuable resource that has real, measurable impact on improving the quality and efficiency of organizational decision-making. This policy

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will ensure that we are responsibly collecting, securing, analyzing, and disseminating data to drive our decision-making processes and build stronger programs and products in the future.

This policy should be seen as a baseline upon which we will iterate and build upon as circumstances change. A set of minimum standards and guidelines accompanies this policy to provide details on how to operationalize the requirements that will be updated periodically.

This policy should not be seen as restricting or discouraging; rather, it sets out to facilitate the invaluable contribution that data makes to the quality of Worldreader's work.

### **III. PRINCIPLES**

Principles that outline best practices in data use:

- **Responsible Data.** Worldreader has a duty to:
  - Prioritize people's rights to consent, to privacy, security and ownership when using data in program and product development and its advocacy efforts.
  - Implement values and practices of transparency and openness.
- **Data Quality.** Quality standards shall be clearly defined and consistently applied across all data in the organization.
- **Data Security.** Worldreader data shall be safeguarded and secured based on recorded and approved requirements and compliance guidelines in line with EU General Data Protection Regulation (GDPR) and other related regulations.

### **IV. POLICY ELEMENTS**

#### **A. Right to be counted and heard**

In order to ensure the rights of vulnerable and marginalized populations, including women, it is important that they are able to be counted and adequately represented as part of the information Worldreader collects and uses. Where appropriate and possible, Worldreader will make every effort to ensure that vulnerable groups including women are fully represented in data collection, and that the resulting datasets can be disaggregated by gender and other relevant categories.

#### **B. Right to dignity and respect**

Worldreader will ensure that a participant's personal dignity is maintained and respected in all phases of the data lifecycle. Data will be collected in a manner that is culturally and contextually appropriate.

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Worldreader will intentionally plan the data lifecycle in such a way as to not create an excessive burden on participants, carefully considering what data is needed and why; how it will be used; and how to collect only the minimum data required to accomplish programmatic aims.

#### C. Right to make an informed decision

Participants have the right to be fully informed in order to make a decision about their participation in any data activity. Worldreader and its partners will seek informed and voluntary consent before obtaining any information from participants. Data will only be used for the purpose it was collected for.

If the data process involves minors, Worldreader will get both their and their legal guardians' consent.

Consent will be based on a transparent and accurate assessment about the use of data and context.

#### D. Right to privacy

Worldreader will ensure a participant's right to privacy in the treatment of their data and has a responsibility to protect the identity of those providing data, unless otherwise outlined and agreed to in the informed consent.

Worldreader will ensure that, when appropriate, the process of data collection is conducted in an environment where the privacy of the participant (or group of participants in the case of focus group discussions) is upheld.

Worldreader will minimize the collection of personal data. When possible, it will work with anonymous data. It will only collect personal data when absolutely essential for the data activity.

Worldreader will ensure that, when appropriate, personal data is separated from other data collected and pseudonymized and/or kept in a secure manner that allows the personal data to be protected. When appropriate, Worldreader will pseudonymize personal data so that it cannot be attributed to a specific data subject without the use of additional information, which is kept separately and will ensure limited access to this additional information.

### **Additional Considerations**

#### **Gender**

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Worldreader will apply the principles of gender equality and non-discrimination as defined in its gender policy during the entire data lifecycle, ensuring that the voices of all people are heard and their opinions/experiences are accurately and fairly represented.

### **Humanitarian Crises and Fragile States**

Extra care will be taken with data collection in humanitarian conflict responses and fragile states.

## **V. GOVERNANCE AND IMPLEMENTATION OF THE POLICY**

The ultimate responsibility for this policy rests with the Executive Leadership. Every 2 years, the Executive Leadership shall commission a review of, and seek recommendations on, potential updates to the Responsible Program Data Policy. This effort ensures that the policy remains current and relevant, given the changing context in which Worldreader operates.

Policy implementation is the responsibility of Worldreader's Information Governance Group. Support for policy implementation will be provided by relevant personnel within each affiliate. Every two years, the Executive Leadership shall commission a review of compliance with the policy, and seek recommendations on potential updates to the Responsible Program Data Policy.

### **Glossary of terms**

#### **Anonymous data**

Information which does not relate to an identified or identifiable natural person or personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable, whether by the data controller or by any other person.

#### **Data**

The physical representation of information in a manner suitable for communication, interpretation, or processing by human beings or by automatic means. Data may be numerical, descriptive or visual.

#### **Data collector**

A person or organization collecting data on behalf of the data controller.

#### **Data controller**

A party who, according to domestic law, is competent to decide about the contents and use of personal data regardless of whether or not such data is collected, stored, processed or disseminated by that party or by an agent on its behalf.

#### **Data management**

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The development, execution and supervision of plans, policies and practices that govern data processing.

**Data processing**

Any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

**Data subject**

The formal term for any individual who is the subject of personal data.

**Informed consent**

A process for getting willing permission to collect data of any kind based upon a clear appreciation and understanding of the facts, implications, and consequences of any engagement from participants.

**Personal data**

Any information relating to an identified or identifiable natural person ('data subject'); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to their physical, physiological, mental, economic, cultural or social identity.

**Program**

A set of strategically aligned, mutually reinforcing interventions—by Worldreader and others—that contributes to creating a culture of reading.

**Project**

A group of activities or interventions with a well-defined target group and period for implementation aiming at achieving a set of outputs or outcomes that will contribute to bringing about changes in people's lives. They are designed and implemented by one or several partners, which might include Worldreader itself, and are aligned through outputs, outcomes, or objectives to an overarching program.

**Pseudonymization**

The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, and such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**Responsible data**

The duty to ensure people's rights to consent, privacy, security and ownership around the information processes of collection, analysis, storage, presentation and reuse of data while respecting the values of transparency and openness.