

Terms of Use

Data Policy – for Pelican Players, Inc.

Philosophy

By protecting the privacy of an individual's information, a nonprofit helps build public trust.

Required by the Accountability Standard

To meet the Donor Privacy Accountability Standard, the client/donor privacy policy must be available on the organization's website or made available upon request.

Introduction

As a rights-based organization, Pelican Players, Inc. is committed to using data responsibly in order to uphold the rights of the individuals, groups, and organizations with whom we work. Using data responsibly is not just an issue of technical security and encryption but also of safeguarding the rights of people to be know what information we are collecting; ensure their dignity, respect and privacy; enable them to make informed decisions; and not be put at risk, when providing data.

Pelican Players, Inc. recognizes that people have rights with regards to the information related to them and that The Pelican Players, Inc. has a responsibility to uphold those rights. The backbone of this policy is:

- A. What we collect**
- B. Right to dignity and respect**
- C. Right to make an informed decision**
- D. Right to privacy**
- E. Right to not be put at risk**

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 Pelican Players, Inc. work, upholding accountability and allowing Pelican Players, Inc. to raise the voices of those with whom we work.

For the purposes of this policy, "data" is considered to be the physical representation of information in a manner suitable for communication, interpretation, researching or processing by human beings or by automatic means. Data may be numerical, descriptive, audio, or visual. The formal term for individuals from whom data is collected is "data subjects". In this policy, however, we use the term "participants" and expand the definition to include any group, cooperative, or other entity with which Pelican Players, Inc. works that provide program data.

This document sets out the policy for the treatment of program data by Pelican

Players, Inc. throughout the data lifecycle from planning to collection through to disposal. This data may pose varying degrees of risk to different stakeholders, including but not limited to the people who provide data, those that collect it, and Pelican Players, Inc.; therefore, this policy includes definitions and requirements for managing high-, medium-, and low-risk data. This policy pertains to data from all of our programs (both project and program), funded by restricted and unrestricted funds as well as earned revenue sources. It will apply to all aspects of the project and program cycle as well as research. Pelican Players, Inc. will uphold this policy for all projects where Pelican Players, Inc. is the data controller. Pelican Players, Inc. is responsible for ensuring 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 Pelican Players, Inc. for the future, establishing systems to enable the organization to take full advantage of the current opportunities and future potential of the data revolution. Recognizing that the policy applies to a rapidly-changing technological context, Pelican Players, Inc. has a responsibility to stay abreast of the implications of these changes for its work. A set of minimum standards and guidelines accompanies this policy to provide details on how to operationalize the requirements and will be updated periodically.

Policy Elements

A. What we collect

We get information about you in a range of ways.

Information You Give Us. We collect your name, postal address(s), email address, phone number, fax number, username, password, demographics information (such as your gender and occupation), and other information you provide us.

Information We Get from Others. We may get information about you from other sources. We may add this to information you provide to us.

B. Right to dignity and respect

Pelican Players, Inc. 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. It is necessary to be aware that there may be laws in addition to standards that regulate how Pelican Players, Inc. works with participants. Pelican Players, Inc. will intentionally plan the data lifecycle in such a way as to not create an excessive burden on participants, carefully considering what data are 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.

Pelican Players, Inc. and its agents will gain informed and voluntary consent before obtaining any information from participants. Data will only be used for the purpose it was collected for. All participants are free to choose whether or not to give their consent, without inducement or negative consequences should they choose not to participate. All participants are free to withdraw their involvement in the data activity at any stage without any negative consequences, including their participation in Pelican Players, Inc. programs. If the data process involves minors, Pelican Players, Inc. will get both their, and their parents' or guardians', consent, except in circumstances when it is inappropriate to do so. Consent will be based on a transparent and accurate assessment about the use of data and context. If the use or the context changes, Pelican Players, Inc. will re-evaluate whether re-consent is needed.

D. Right to privacy

Pelican Players, Inc. will ensure a participant's right to privacy in the treatment of his/her data and has a responsibility to protect the identity of those providing data, unless otherwise outlined and agreed to in the informed consent.

Pelican Players, Inc. 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. Pelican Players, Inc. and its agents will not discuss or share in any form, information gathered from participants with any unauthorized (by Pelican Players, Inc.) persons.

Pelican Players, Inc. will minimize the collection of personal data, only collecting it when absolutely essential for the data activity. Pelican Players, Inc. will ensure that where appropriate PII (personally identifiable information or SPI (sensitive personal information)) data is separated from other data collected and kept in a manner that allows the PII to be protected. Pelican Players, Inc. will ensure limited access to identified data records and store them securely. While Pelican Players Inc. encourages data sharing for transparency and accountability purposes, data that is shared openly must be anonymous, unless specific consent from the participant has been obtained, and it does not place participants at risk.

E. Right to not be put at risk

Pelican Players, Inc. will not put participants in any security risk as a result of its data activity. This principle is not pertinent when public officials or private sector actors who are acting in their official capacity. These individuals/ groups will be protected when acting as private citizens and not in their official capacity.

Pelican Players, Inc. and its agents will not collect non-essential data that could put participants at risk without justification and a clear process for managing and mitigating that risk.

Pelican Players, Inc. will take all reasonable measures to ensure that the process of data collection and the totality of the data lifecycle have no negative physical, psychological, or political consequences for the participants. Pelican Players, Inc. will store all high-risk data securely. Pelican Players, Inc. will mitigate risk to all its participants, but especially participants from vulnerable populations and groups or any participants engaged in sensitive topics/activities. Such topics must only be approached by personnel with the appropriate training and experience.

Governance and implementation of the Policy

The ultimate responsibility for this policy rests with the Board of Directors. Every 3 years, the Board 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 Pelican Players, Inc. operates. Following any updates to the policy, the set of minimum standards will also be reviewed and updated as required. Policy implementation is the responsibility of Pelican Players, Inc. CEO and his/her designates. Support for policy implementation will be provided by relevant personnel within each affiliate. Every three years, the Board shall commission a review of compliance with the policy, and seek recommendations on potential updates to the Responsible Program Data Policy.

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