



INNOVATIONS AND COVID19 ADAPTATIONS IN THE MANAGEMENT OF CHILD WASTING PRIVACY & DATA USE PLAN

This privacy and data use plan sets out how Action Against Hunger-USA collects, uses, and stores personal and non-personal data, throughout its activities associated with the “Adapted Approaches to the Management of Wasting in COVID-19” study.

PERSONAL IDENTIFYING INFORMATION COLLECTED

During the initial screening survey, in accordance with the General Data Protection Regulation (GDPR) and the EU-US Privacy Shield, Action Against Hunger will collect personal data (including respondent name, organization of employment, professional title, email and location) from respondents for the purpose of contacting individuals for verifying information provided in the screening survey and possible study participation in the semi-structured interviews. Sensitive personal data will not be collected during this study. Identifying information will only be obtained if respondents provide agreement to the conditions outlined in this document. It is deleted when no longer relevant, is never shared with third parties, and is available to respondents at any point should they wish to see it.

DATA COLLECTION, ENTRY AND STORAGE

Data will be collected using a mix of electronic platforms, recordings and paper. All data from the initial screening survey will be collected via the Microsoft Forms online platform whereby data entered by survey respondents will be stored on secure servers in the United States. When permitted by participants, the semi-structured interviews will be recorded and transcribed by the interviewer. Handwritten notes will be taken for comparison and validation purposes. Information regarding each secondary dataset received will be recorded in an electronic excel file. This will serve as the management file for the entire database once the data sets are compiled. The study PI will review all uploaded data into the databases on a regular basis and follow-up with the research team with any questions or concerns

Primary data from the semi-structured interviews and secondary data from programs will be stored on a password protected encrypted server hosted by Action Against Hunger. The research team will transfer the data from the Microsoft Forms online platform to an electronic database stored on Action Against Hunger’s encrypted server. Both Microsoft Forms and Action Against Hunger’s servers are GDPR and EU-US Privacy Shield compliant. All semi-structure interview notes will be maintained securely in a locked file throughout the project to ensure participant confidentiality.

To anonymize the personal information of respondents participating in interviews, each individual will be assigned a unique identifier. Only this unique identifier will be used to label interview notes and materials not easily stored on encrypted servers. All personal identifiable information gathered for the purposes of this study will be stored by Action Against Hunger-US electronically. Personal data will be securely stored for two years on a password protected encrypted server. Once this time period expires, all personal data will be erased from the organization’s records.

DATA CONFIDENTIALITY AND PROTECTION

Action Against Hunger is fully committed to complying with the principles set out in the General Data Protection Regulation and has a legal duty to protect any information collected from respondents. No personal information will be shared for research purposes. Personal identifiable information (respondent name, organization of employment, professional title, email and location) will be shared only with Action Against Hunger research team members. Inaccurate or misleading data will be corrected as soon as possible. All personal data will be protected from unauthorized or accidental disclosure and processed in an appropriate manner to maintain its integrity and confidentiality. Prior to collection, respondents will be fully informed of the data collection, data use, and the respondents' rights outlined under the GDPR.

After the close of data collection and before final analysis, all personal identifiable information (e.g. name, location, telephone number) will be removed from the database. The anonymized database for the overall study will be maintained by the PI on a password-protected server hosted by Action Against Hunger.

In the event that confidentiality is breached, Action Against Hunger USA will take immediate action to attend to the situation that caused the breach and prevent any further breaches. Action Against Hunger will notify research partners and other relevant parties including, but not limited to: contractual partners, the study funder (USAID), and study participants within thirty days. All current study participants will be notified of the breach, including the extent of the breach, and reminded that the study participation is voluntary, and they have the opportunity to withdraw from the study and have their personal identifiable information withdrawn from the data. All past study participants who may have already completed the data collection process will also be notified and given the opportunity to have their personal data removed from the final dataset if they so wish.

COMPLIANCE WITH LAWS AND REGULATIONS

Action Against Hunger will make every effort to comply with all laws and governmental rules, regulations, good practices and guidelines which are applicable to the data collected as part of this research or the use thereof, including and without limitation to countries and international best standards and rules relating to confidentiality, ethics and research. This includes the General Data Protection Regulation and the EU-US Privacy Shield.

Action Against Hunger is responsible for obtaining any country approvals that are necessary to carry out data collection, storing, analysis, sharing, and any other use of the data as it pertains to this study or future studies that may involve the use of this data.

INDIVIDUALS RIGHTS

Action Against Hunger supports the principles of "fair and transparent" processing of personal information. Individuals have the right to ask Action Against Hunger whether information is being processed about them, and to request access to this information.

Individuals may ask Action Against Hunger, or Action Against Hunger may ask them, to rectify information that is potentially inaccurate. Individuals may also ask the organization to remove information that is inaccurate or complete information which is incomplete.

Individuals have a right to object to Action Against Hunger processing their personal information at any time where the organization relies on its legitimate interests for doing so.

Individuals have a right to obtain their personal data from Action Against Hunger and reuse it for their own purposes without hindering the usability of the data.

Individuals have a right to seek the erasure of their data. They may wish to exercise this right for any reason, for example, where it is no longer necessary for Action Against Hunger to continue holding or processing the personal data.

Individuals have a right to ask Action Against Hunger to restrict the processing of their information if:

- The individual contests its accuracy and Action Against Hunger needs to verify whether it is accurate
- The processing is unlawful and an individual asks to restrict use of it instead of erasing it
- Action Against Hunger no longer needs the information for the purpose of processing

To exercise any of the rights detailed above, an individual can contact Heather Stobaugh, Senior Research and Learning Specialist at the address below. Action Against Hunger will act in accordance with the request as soon as reasonably possible. There will be no charge.

Email: cmamadaptations@actionagainsthunger.org (please state “Data Protection Right” in the subject line of your email)

Address:

1 Whitehall, 2nd Floor
New York, NY 10004, USA

SHARING AND TRANSFERING OF DATA

Action Against Hunger-USA will own any and all data collected as part of this research study. Action Against Hunger-USA may share any part or whole of the anonymized datasets with partners implicated in this research, including UNICEF, the CDC, and Action Against Hunger-UK. This data is always provided in an encrypted format. All respondents will be fully informed and be asked permission for Action Against Hunger to share information on publicly accessible platforms.

Personal identifiable information will not be shared nor sold under any circumstances outside of Action Against Hunger-USA’s research team and will only be used for the purposes for which it was obtained. When anonymized data is shared beyond Action Against Hunger-USA, Action Against Hunger-USA will enter into a data sharing agreement that ensures the ethical use of the data and compliance of any and all applicable laws and governmental rules, regulations, good practices and guidelines.

By sharing the anonymized datasets, transfers may include countries that do not provide the same level of data protection. In these circumstances, Action Against Hunger-USA will take all reasonable steps to ensure the safety and security of information as set out in this document, including adhering to the EU-US Privacy Shield Agreement.

SHARING OF STUDY RESULTS

Action Against Hunger plans to share the information and benefits of the study to study participants and the wider humanitarian aid and global nutrition community through multiple channels. Results and benefits of the study will be shared with the donor, OFDA, which maintains humanitarian programming throughout many countries. These results will inform and aim to improve upon operations in countries where applicable.

Additionally, Action Against Hunger aims to share results of the study on publicly accessible platforms to facilitate wide uptake of results to help inform the ongoing COVID-19 emergency response. This will include Action Against Hunger’s State of Acute Malnutrition, Community of Practice on Simplified CMAM Approaches website, which is designed and managed by Action Against Hunger. Results will be compiled by the study team regarding the variety of adapted CMAM programs and coinciding case studies that will then be shared on the platform. Furthermore,

results will be circulated through all initial recruitment channels and among all participating organizations and government' ministries who provided initial information in the screening survey.

DATA REPOSITORY

After analysis is complete, a final anonymized database will be made available on a USAID data repository (e.g. Development Data Library). The dataset will not contain any proprietary or personally identifiable information, such as social security numbers, home addresses, and dates of birth. Such information will be removed prior to submission. This follows funder (USAID/OFDA) regulations for all research supported by USAID. This data repository is open access and publicly available.

CONTACTING ACTION AGAINST HUNGER

If there are any question about Action Against Hunger-US's policy and data use plan, the data held, or a study participant would like to exercise one of their data protection rights, the organization can be contacted at the following addresses.

Email: cmamadaptations@actionagainsthunger.org

Phone: +1 (212) 967-7800

Address: Action Against Hunger, 1 Whitehall St #2nd, New York, NY 10004