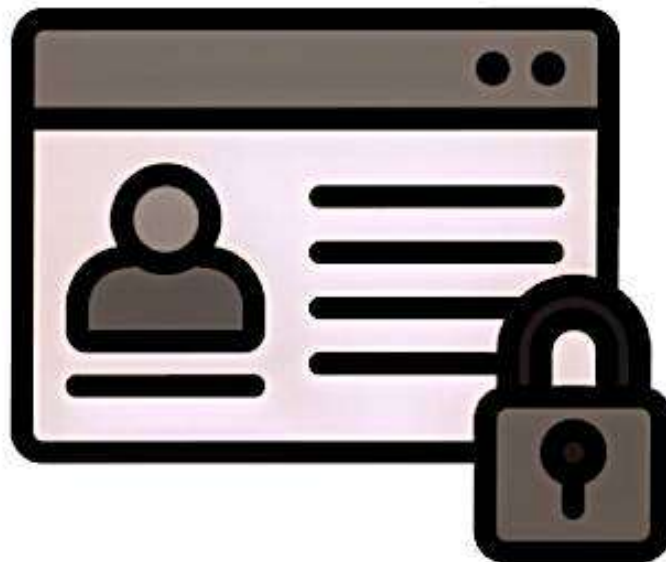




## Data Protection and Management Policy

### Health Education and Development Society (HEADS)



#### Abstract

This Data Protection and Management Policy outlines the Health, Education and Development Society's (HEADS) commitment to safeguarding personal and sensitive data of its employees, beneficiaries, and stakeholders. It establishes clear principles and procedures for lawful data collection, secure handling, limited retention, and responsible processing in compliance with legal standards. The policy defines roles and responsibilities across the organization to ensure transparency, accountability, and preparedness in case of data breaches. Special provisions are included for the handling of sensitive and children's data, with emphasis on consent, security, and compliance. Updated in January 2025, this policy reinforces HEADS' dedication to ethical data practices and upholding individual privacy rights across all operations.

[www.heads-ngo.org](http://www.heads-ngo.org)



**Background:**

Health, Education and Development Society (HEADS), is a non-profit, non-political and non-governmental organization registered in Pakistan under the Societies Act 1860. Since its establishment in 2013, HEADS has been actively engaged in the developmental and humanitarian sectors. The organization is led by a dedicated Board of Governors (BoG), consisting of professionals with diverse educational backgrounds and capabilities. HEADS operate under a comprehensive set of policies designed to ensure transparency, accountability and efficiency in its systems and operations. HEADS Currently registered in the Islamic Republic of Afghanistan, and established an office in the capital city, Kabul.

Throughout its history, HEADS has worked closely with communities and various stakeholders, addressing a wide range of issues, including but not limited to Education, Health, Protection, Livelihoods, Community Infrastructure (CPIs), Shelter and Settlement, Community Development, Institutional Capacity Building, Research, Gender Equality, Legal Counselling, Referral Mechanisms, Social Accountability, Right to Information, and Governance.

In addition to these programmatic areas, HEADS place a strong emphasis on cross-cutting themes, including social mobilization, gender mainstreaming, inclusion, and resilience in all its core programs. These themes reflect the organization's commitment to addressing the holistic needs of communities and promoting sustainable development.

**Vision:** Every Individual regardless of background or circumstances enjoy equal opportunities and rights with dignity.

**Mission:** Empowering Communities through strategic investment in human capital and institutional capacity development, raising sustainable development at the grassroots level.

**Objectives:**

- Support and develop replicable models and strategies for sustainable human resource development through skills development initiatives.
- Network and collaborate with the Govt. Departments, NGO's, CBO's, WOs and international agencies/donors for sustainable development.
- Support initiatives for sustainable community-based gender sensitive development with particular focus on; Human and institutional Development, Natural Resource Management, Drinking Water Supply, Environmental Sanitation, Education, Agriculture, Health & Nutrition, Disaster Management and Micro Credit & Enterprise.
- Create economic and recreational opportunities for youth through skill enhancement programs for peace promotion.
- Enable equitable access to quality education and healthcare, raising holistic community development and well-being.
- Promoting Social Inclusion and Empowerment;
- Strengthen Resilience to Climate Change and Environmental Degradation.
- Advocacy for Peace, Human Rights, and Social Justice.
- Building Disaster Resilience and Preparedness



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## Introduction

Health Education and Development Society (HEADS) is committed to protecting the personal data of its employees, beneficiaries, partners, and stakeholders. This policy establishes guidelines on the collection, handling, storage, and security of personal data in compliance with legal requirements and organizational standards.

## Purpose and Scope

This policy ensures the proper management and security of personal data to prevent unauthorized access, loss, or misuse. It applies to all HEADS employees, volunteers, contractors, consultants, and third-party service providers handling data on behalf of HEADS.

## Key Principles

- **Lawfulness, Fairness, and Transparency:** Data shall be processed lawfully, fairly, and transparently.
- **Purpose Limitation:** Data shall be collected for specified, explicit, and legitimate purposes only.
- **Data Minimization:** Only the necessary data required for specific processing purposes shall be collected and retained.
- **Accuracy:** Personal data must be accurate, up-to-date, and corrected if found inaccurate.
- **Storage Limitation:** Data shall not be retained longer than necessary for its intended purpose.
- **Integrity and Confidentiality:** Adequate security measures shall be in place to prevent unauthorized access, loss, destruction, or damage.

## Data Processing and Management

### Types of Data Collected

HEADS collects personal and sensitive data including:

- Employee records (name, address, financial details, performance evaluations)
- Beneficiary information (demographic details, service usage data)
- Stakeholder and partner details (contact information, agreements, collaboration records)

### Processing and Usage

Data is processed for employment administration, program implementation, service delivery, monitoring, and reporting purposes. Processing follows legal guidelines and requires explicit consent where applicable.

### Legal Basis

HEADS ensures that personal data is processed lawfully, fairly, and transparently. The legal basis for processing personal data includes:



- **Consent** – Where individuals have given explicit permission.
- **Contractual Obligation** – Where processing is necessary for contractual performance.
- **Legal Compliance** – Where processing is required by law.
- **Legitimate Interest** – Where processing is necessary for HEADS' operational needs, provided it does not override individual rights.

### **Data Retention and Storage**

HEADS shall store personal data securely and limit retention periods as per the HEADS Data Protection Policy. Sensitive data shall be encrypted and access restricted to authorized personnel only.

### **Data Retention Periods**

To ensure compliance with data protection regulations, HEADS follows defined retention periods:

- **Employee Records** – Retained for five years after termination.
- **Financial Records** – Retained for seven years for audit compliance.
- **Beneficiary & Program Data** – Retained for three years post-project completion.
- **Sensitive Data** – Retained only for as long as strictly necessary, then securely deleted.

All records will be securely disposed of once the retention period expires.

**Accuracy and Updates:** HEADS will implement procedures to maintain data accuracy, ensuring regular updates and corrections when required.

### **Handling of Sensitive and Children's Data**

- Written consent from parents or guardians shall be obtained when processing children's data.
- Sensitive data (race, religion, health, criminal records, etc.) shall be processed only when legally justified and with additional security measures.

### **Treatment of Sensitive Personal Data**

Sensitive Personal Data refers to highly confidential information related to an individual, including but not limited to:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade Union membership
- Physical or mental health conditions
- Sexual orientation
- Criminal convictions, offences, or related security measures
- Genetic data
- Biometric data

HEADS will only collect and process Sensitive Personal Data when the Data Subject provides clear, unambiguous, and freely given consent.



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### ***Processing of Sensitive Data***

- HEADS may process employees' Sensitive Personal Data to fulfill legal obligations related to employment, social security, or social protection laws.
- Where staff or volunteers work with children or vulnerable adults, HEADS may process criminal records for background verification under public interest requirements.
- In emergency situations, HEADS may use Sensitive Personal Data to protect an individual's vital interests, particularly when they are unable to provide consent.
- Access to Sensitive Personal Data is strictly limited to authorized personnel, such as medical, safeguarding, and HR teams.

### ***Transfer of Personal Data***

HEADS ensures that any transfer of Personal Data follows strict protection measures. Personal Data may only be transferred if:

- Adequate safeguards are in place to protect data security.
- The transfer aligns with HEADS' data protection policies.
- The Data Subject has provided explicit consent for the transfer.

If there are any uncertainties regarding data transfers, HEADS personnel should consult their manager or the Data Protection Officer (DPO) for guidance.

### ***Privacy Notices***

Privacy notices serve to inform Data Subjects about:

- Who HEADS is
- How HEADS processes Personal Data
- Steps taken to protect Personal Data

All changes to privacy notices must be approved by the Data Protection Officer (DPO) and reviewed annually. If HEADS collects Personal Data from a third party or a public source, the Data Subject must be provided with a copy of the privacy notice within one month of data collection.

### ***Data Transfer Safeguards***

To protect personal data during transfer, HEADS implements:

- **Encryption** – All transmitted data is encrypted using industry-standard protocols.
- **Access Controls** – Only authorized personnel can transfer personal data.
- **Secure Storage** – Data is stored on password-protected servers with restricted access.
- **Third-Party Compliance** – All data-sharing agreements require third parties to adhere to HEADS' security standards.

### ***Security Measures***

HEADS implements robust security protocols to prevent data breaches:

- **Access Controls:** Limiting data access to authorized personnel.
- **Encryption:** Protecting sensitive data through encryption techniques.



- **Data Backup:** Regularly backing up critical data to prevent loss.
- **Secure Storage:** Storing physical and electronic data in protected environments.

### ***Regular Security Testing***

To ensure data security, HEADS will conduct:

- **Annual Penetration Testing** – Simulated cyberattacks to identify vulnerabilities.
- **Quarterly Vulnerability Assessments** – Scans to detect security weaknesses.
- **Encryption Audits** – To verify data encryption levels are up to standard.
- **Access Reviews** – Periodic checks to ensure data access is limited to necessary personnel.

### **Data Breach and Incident Management**

#### **Reporting a Data Breach**

- Any suspected or confirmed data breach must be reported immediately to the Data Protection Officer (DPO).
- The report must include details of the breach, time, location, and affected individuals.

#### **Investigation and Risk Assessment**

- The DPO will assess the breach, determine the severity, and initiate necessary containment measures.
- An investigation shall be completed within 24 hours of discovering the breach.

#### **Notification and Response**

- If necessary, affected individuals and regulatory authorities shall be notified within 72 hours.
- The DPO will coordinate mitigation efforts, including communication with external stakeholders (e.g., law enforcement, insurers).

#### **Data Subject Rights**

HEADS shall uphold the rights of data subjects, including:

- Right to access, correct, or delete personal data.
- Right to object to data processing and withdraw consent.
- Right to data portability and restriction of processing.

### **Roles and Responsibilities**

#### ***Role of the Infrastructure, Security, and Compliance Manager***

The Infrastructure, Security, and Compliance Manager holds a critical role in ensuring the security, integrity, and compliance of HEADS' data management systems. Their key responsibilities include:

- **Ensuring Data Security Standards** – Overseeing that all systems, services, and equipment used for storing personal data meet industry best practices and HEADS' security policies.



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- **Conducting Regular Security Audits** – Performing routine checks and scans to verify that security hardware and software are functioning optimally.
- **Assessing Third-Party Service Providers** – Evaluating the technical suitability and compliance of external services used for data storage or processing, ensuring they align with HEADS' security and privacy requirements.
- **Monitoring and Preventing Data Breaches** – Implementing and maintaining data breach detection and monitoring solutions to identify vulnerabilities and respond proactively to potential security threats.
- **Board of Governance:** The Board ensures overall compliance and approves data protection policies.
- **Data Protection Officer (DPO):** The DPO oversees policy implementation, training, compliance checks, and incident response.
- **Managers and Employees:** Managers ensure departmental adherence, while employees are responsible for handling data securely and reporting any breaches.

### **Audit Compliance and Oversight**

To ensure a high level of compliance with the HEADS Data Protection and Management Policy, the HEADS Internal Audit Function will conduct regular compliance checks as part of its scheduled internal audits. These audits will assess:

**Assignment of Responsibilities** – Ensuring that designated personnel fulfill their roles in data protection and management.

**Awareness and Training** – Evaluating the effectiveness of training programs and awareness initiatives on data security and privacy.

**Operational Effectiveness** – Reviewing HEADS's data protection measures, including:

- Maintenance of Data Subjects' rights and proper handling of personal data.
- Incident management and response to personal data breaches.
- Compliance with data privacy notices and adherence to established procedures.
- Mechanisms for addressing non-compliance and ensuring corrective actions.
- Accuracy and integrity of personal data storage and processing.
- Proper handling of Subject Access Requests in line with policy and legal requirements.

### **Policy Monitoring and Review**

This policy is subject to regular reviews to ensure compliance with evolving regulations and best practices. Amendments are made as needed, with approvals from the Board of Governance.

### **Dissemination and Enforcement**

- HEADS Internal Audit Function shall conduct compliance checks as part of internal audits.
- Employees shall receive regular data protection training.

### **Disciplinary Actions**

Violations of this policy will result in strict disciplinary measures, including:

- Verbal or Written Warning – For minor breaches.
- Temporary Access Restriction – For moderate violations.
- Termination of Employment/Contract – For serious or repeated breaches.
- Legal Action – If the breach results in significant damage or regulatory non-compliance.



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### **Effective Date**

**This policy is effective immediately upon approval and applies to all HEADS personnel and affiliates handling data. By adhering to this policy, HEADS ensures ethical and responsible data management, fostering trust and compliance across all levels of operation.**



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## BOD Meeting Minutes

Date: January 06, 2025

Participated by:

Raza Ullah Jan	Executive Director
Uzma Amin	Chairperson Board
Samina Khanam	Board Member
Nawaz Ali Shah	Board Member
Amabareen Banori	Board Member
Muhammad Jidran	Board Member
Abid Ali	Board Member
Tahira Nasreen	Board Member
Sayed Ali Shah	Director Program
Asif Ali	Director Finance
Ramsha Khan	HR Officer

### Agenda Items:

- Change in Leadership position
- Formation of the Annual Report, Annual Budget, and Strategic Plan.
- Completion of the NDRMF Capacity Improvement Action Plan.
- Processing for Charity Commission in Balochistan and Khyber Pakhtunkhwa.
- Revision of HEADS policies.
- Renewal of Society Act Registration for 2025.

### Proceedings & Outcomes:

The meeting commenced with the recitation of the Holy Quran, followed by a formal welcome note delivered by the Chairperson, Ms. Uzma Amin, and the Executive Director, Mr. Raza Ullah Jan. The discussions focused on the agenda items and organizational improvements.

- The Board decided to shift Mr. Raza Ullah Jan from the position of Chairperson of the Board of Directors (BOD) to Executive Director of HEADS, following the resignation of Ms. Samina Khanam from the role of Executive Director. Ms. Khanam has now joined the Board as a Board Member. Additionally, Dr. Uzma Amin has been appointed as Chairperson of the Board, effective immediately.
- The Board emphasized the importance of preparing Annual Report/ Annual Budget and Strategic Plan to assess the organization's current standing and plan strategically for the upcoming year.
- As HEADS has been conditionally accredited by the National Disaster Risk Management Fund (NDRMF) for six months, the Board reviewed the shared Capacity Improvement Action Plan. It was decided to prioritize its completion within the stipulated timeframe, recognizing this as a crucial opportunity for the organization.

- The Board agreed to initiate the process for Charity Commission registration in Balochistan. Police verification for the Charity Commission in Khyber Pakhtunkhwa will be expedited to obtain the certification promptly.
- A comprehensive review of organizational policies was conducted. The Board proposed and approved necessary amendments to align with current needs and best practices.
- It was noted that the Society Act Registration expired in December 2024. The Board resolved to apply for its renewal for 2025 without delay.

The meeting concluded with a thorough review of the agenda items, ensuring they aligned with the organization's strategic objectives. The Board expressed optimism about the successful execution of the discussed initiatives. The Chairperson concluded the meeting with a vote of thanks.

Signed on this Monday January 06, 2025 by authorized signatory.



Dr. Uzma Amin  
Chairperson Board



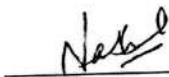
Mr. Raza Ullah Jan  
Executive Director



Ms. Samina Khanam  
BOG Member



Mr. Muhammad Jidran  
BOG Member



Mr. Nawaz Ali Shah  
BOG Member



Miss Ambareen Banori  
BOG Member



Mr. Abid Ali  
BOG Member



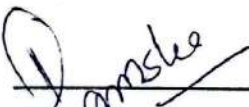
Miss Tahira Nasreen  
BOG Member



Mr. Sayed Ali Shah  
Program Director HEADS



Mr. Asif Ali  
Director Operations HEADS



Miss Ramsha Khan  
HR Officer





## Policy Review & Update Record

A Board meeting was held on January 6, 2025, with the key agenda of reviewing and updating all organizational policies of HEADS. The Board advised the management to undertake a comprehensive policy review to ensure relevance, compliance, and alignment with organizational goals and evolving operational needs.

In line with this directive, all organizational policies were reviewed and amended on January 31, 2025, under the leadership of the Executive Director and with the involvement of the Finance & Audit Committee and relevant departments.

The review process included:

- A thorough evaluation of existing policies.
- Revisions based on internal assessments, audit findings, regulatory requirements, and best practices.
- Incorporation of feedback from staff and stakeholders.
- Updates to enhance clarity, accountability, and operational effectiveness.

### Means of Verification:

Revised policy documents, review reports, and documented feedback and approval records.



( H E A D S )

Raza Ullah Jan  
Executive Director