

Plantwise Policy on Personal Data Protection

The data collected, stored and analysed by Plantwise, in both paper and electronic formats, are important for quality assurance, monitoring and evaluation, and impact assessment. CABI facilitates the use and analysis of these data where necessary. Consideration must be given to data protection as a limited amount of personal data are collected, such as name, gender and telephone number, from plant clinic visitors, plant doctors and other stakeholders. It is a basic principle that data are collected and owned by the countries implementing Plantwise and shared under agreement⁵ with CABI, a data controller registered with the Information Commissioner's Office of the UK. As CABI is headquartered in the UK, it manages the data within its Plantwise activities under the eight principles of the UK Data Protection Act 1998⁶, and EU Data Protection Directive 1995⁷, as outlined below. Where the source country does not have legislation to the standard that CABI applies, CABI will advise the relevant in-country organisations of the principles CABI applies to the processing of personal data, and encourage similar standards.

1. *Personal data shall be processed fairly and lawfully.* Personal data are processed only in support of the Plantwise programme and associated plant health activities.
2. *Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.* Personal data will only be collected for valid operational reasons, including: (i) to deliver support to stakeholders in the national plant health systems in countries implementing Plantwise; (ii) to provide smallholder farmers with better access to the advice and information needed; and (iii) to evaluate Plantwise methods and approaches.
3. *Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.* The personal data collected will be kept to the minimum required for the purposes identified above.
4. *Personal data shall be accurate.* Personal data will be as provided by the farmers, plant doctors or other individuals. CABI will work actively to correct data and will always take appropriate action if challenges are made to data accuracy.
5. *Personal data processed for any purpose(s) shall not be kept for longer than is necessary for that purpose or those purposes.* All personal data CABI manages on behalf of countries will be stored securely and disposed of in a timely and appropriate manner.
6. *Personal data shall be processed in accordance with the rights of data subjects.* Farmers and other stakeholders will be providing their personal data in association with plant health problems and information will not be used in any other context. Farmers visiting plant clinics will be aware of the data collected as they will be given a copy of the completed clinic prescription form or sent a message to their mobile with a summary of advice. Plant doctors should be able to provide a simple explanation of how the personal data may be used. Participants in questionnaires, etc. for monitoring and evaluation will always be given an explanation as to what personal data are being collected and how they will be used, and may withdraw at any time.
7. *Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.* CABI provides scientific information on a regular, professional basis and has a strong background in information security. For CABI's Plantwise activities, electronic information is maintained in secure access-controlled systems, hard copy material is held in a Plantwise office, and access limited to authorised users. Risks associated with personal data security will be regularly reviewed.
8. *Personal data shall not be transferred to a country or territory unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.* Plantwise activities will involve exchange of data with the appropriate in-country organisation, based on the data originally collected in that country and shared with CABI. CABI will eliminate, as appropriate, personal data from any information shared with other parties. CABI does not under any circumstances sell, trade or rent personal data to any third party.

5. An example of this agreement is shown here: <http://www.plantwise.org/default.aspx?site=234&page=4717>

6. The eight principles are taken from The Guide to Data Protection issued by the Information Commissioner's Office: http://www.ico.gov.uk/for_organisations/data_protection/~media/documents/library/Data_Protection/Practical_application/the_guide_to_data_protection.ashx

7. http://ec.europa.eu/justice/data-protection/index_en.htm and links from this page