

RFL Code of Conduct for Data Protection Compliance Checklist

This checklist is to identify whether the quality of service to beneficiaries meets the minimum requirements for data protection set out in the Code.

Legal situation in my country	Comments/References/Details
1. Applicable Data Protection law in my country (e.g. national, regional, international)	
2. Red Cross/Red Crescent Law in my country	
2a) Mention of RFL activities in the Red Cross/Red Crescent Law	
3. Law in my country stating that activities of the National Society/RFL activities are fulfilled in the “public interest”	

Data Protection and data security commitments in my National Society/Delegation

4. Person assigned as a Data Protection officer for my organisation (NB: not a specific Code requirement)	
5. Confidentiality policy (NB: not a specific Code requirement)	
6. Staff discretion contractual clauses	
7. Existence of and respect for a data retention policy	
8. Technical, physical and organisational security measures to protect personal data against loss, theft, unauthorized or unlawful access or disclosure exist	

Requirements to be fulfilled by my RFL service

9. Person or unit assigned as a Data Protection Focal Point for RFL with the responsibility to ensure compliance with the Code	
10. The RFL service at the time of collecting data sets out the specific, explicit and legitimate purpose(s) for which data is collected, stored or transferred, or otherwise processed	
11. The RFL service informs enquirers (written or verbally) about the following:	
11a) the identity and contact details of my organisation	
11b) the specific purpose for collecting, storing and transferring their personal data and an explanation of the potential risks and benefits;	

11c) their personal data may be used for purposes other than those initially specified at the time of collection, if compatible with RFL activities	
11d) circumstances in which it might not be possible to treat their personal data confidentially;	
11e) their right to access, correct and delete their personal data and later object to the use of the data (and its limitations)	
11f) an indication of the security measures implemented by my organisation	
11g) that their data may be transferred to another country	
11h) an indication of my organisation's policy on record retention (how long records are kept and any steps taken to ensure that records are accurate and kept up to date)	
11i) whether their personal data can be shared with other organizations, including other National Societies, with the authorities or be publicly disclosed and to approve that their personal data be used as explained	
12. The RFL service always asks consent of the sought person when found to pass on information to the enquirer	
13. The RFL service provides (written or verbally) the data subject with information on the processing of their personal data	
14. The RFL service regularly reviews its data (files, database, archives) to ensure that it is adequate, relevant and not excessive	
15. A risk assessment is carried out every time data is transferred out of my organisation (whether within or outside of the Movement)	
16. Faced with a request from authorities, the RFL service in principle does not provide beneficiaries' data to them.	
17. If family members or legal guardians request data of a child or a person who cannot provide consent due to incapacity, the RFL service presumes that this is in the best interest of the beneficiary. This presumption can be rebutted.	
18. A data subject is allowed to exercise his/her rights to information, access, rectification, and deletion of his/her personal data, as specified in the Code	
19. The internal guidance on RFL activities expresses the need to protect personal data and provides guidance on how to implement this protection	