



# Bonsucro Data Governance Policy

V 1.0 – December 2021

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# Bonsucro Data Governance Policy

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## Scope

Data governance provides the ability for Bonsucro to manage the life cycle of data in accordance with all applicable laws and our overall strategy.

This policy demonstrates how Bonsucro will achieve data governance and sets out the policies, processes and rules that will be implemented to achieve this.

This document sets out the policy and framework to be followed to manage organisational data and applies to data in all its forms.

In accordance with this policy, stewardship responsibilities for Bonsucro data applies to all who have contact with data and/or establish standards for the custodianship of such data. All users are stewards and are cited as such.

## Status and Effective date

Final version V 1.0

Validity: under review every three years.

## Audience

This policy applies to how Bonsucro governs data and sets out responsibilities for stewards of organisational Data.

This policy informs data governance decision making for Bonsucro. All staff involved in Bonsucro processes benefit from well-governed data and must comply with this policy. Bonsucro's overall digital strategy is informed by and supports the goals of data Governance.

### 1) Purpose and Goals

Organisational data is a strategic asset of Bonsucro and shall be managed according to sound data governance procedures and approved principles.

Benefits of applying this policy will include ensuring data is fit for the purposes of internal and external reporting, is appropriately categorised for storage, retrieval, destruction, backup, and access, as needed to ensure proper management and protection of organisational data.

The specific goals of this policy are:

- Reducing the risk of mismanagement of data by staff or others, which may lead to fines, reputational damage, and can have other process and financial implications
- Enabling better decision-making
- To ensure all staff have a common approach to data and have a system to apply that approach
- Ensuring efficiency and transparency of processes
- Informing business continuity (ensuring the ongoing availability and disaster recovery of key data)
- Supporting Digital roadmap planning and technical decisions
- To reduce costs and increase effectiveness through coordination of efforts

### 2) Governance - Roles and Responsibilities

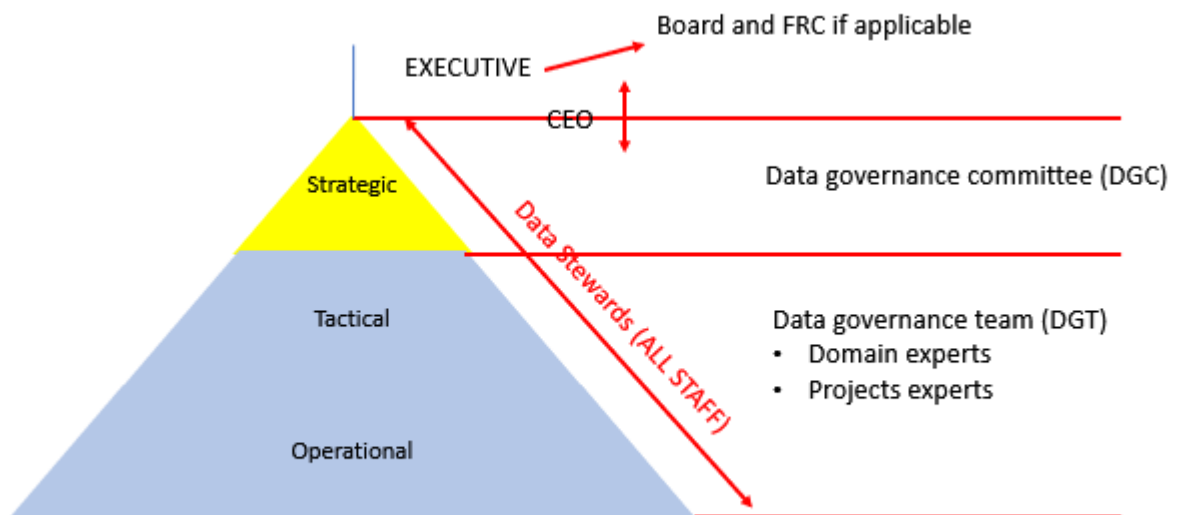
Bonsucro has referred to ISEAL’s community resources, created to help members strengthen their data governance programmes and has followed the suggested ten practical steps for a data governance policy. (Background [here](#), login required for resources). As a result, Bonsucro has adopted a comprehensive framework for data governance. Best practice principles have been adopted and adapted across the governance and planning of data processes.

**Roles:** The summary below outlines the keys roles in data governance at Bonsucro. [Appendix 1](#) contains full definitions of key words.

- **DGC (Data Governance Committee)** looks after data governance and Data Strategy and is accountable to the Board of Directors. The Bonsucro CEO appoints DGC members, who include representatives from all Bonsucro teams. The DGC may create further subcommittees and task forces as needed.
- **DGT (Data Governance Team)** is responsible for administering the data governance and Data Strategy and facilitating the use of data. The DGT comprises of domain experts and project experts who look after particular sets of data, such as “people data,” “member data”, and so on. For example, the Head of Corporate Services is a suitable domain expert for people data. Experts shall be responsible for the management of data under their oversight, under the direction of the DGC.
- **Data Stewards:** Anyone who comes into contact with Bonsucro data, to review, compile, receive, edit or pass it on is a Data Steward.

## 2.1 Organisational responsibility (Data Governance framework)

The pyramid diagram below outlines how the key governance roles are linked and what role they play.



- Executive sets overall direction
- The CEO heads the DGC (Data Governance Committee) and refers to the Board or FRC (Finances and Risks Committee) where appropriate.

- c. DGC governs Data Strategy and sits at a strategic level. DGC shall direct, monitor and oversee data management processes supporting data governance
- d. DGT (Data Governance Team) is responsible for administering the data governance and strategy and facilitating the use of data.
- e. Data governance Project and/or Domain experts form on an ad hoc or project basis around domain areas, such as Impact data (Outcome Report). If not already included in the DGT, they might be called to join the DGT on a temporary basis to represent a specific project.
- f. Data Stewards: anyone who comes into contact with data at Bonsucro, to compile, receive, edit or pass on data. All data stewards must be aware of the Bonsucro governance principles for data and adhere to the data protection rules.

## 2.2 Personal responsibility

All Data Stewards have responsibility for preserving the security and integrity of Bonsucro Data and must adhere to the following:

- **Confidentiality:** Respecting the confidentiality obligations and privacy rights of individuals and companies whose records they may access.
- **Ethics:** Observing the ethical restrictions that apply to data to which they have access to.
- **Policy Adherence:** Abiding by applicable laws and Bonsucro policies with respect to access, use, protection, proper disposal, and disclosure of data.
- **Quality Control:** Reviewing reports created from data to ensure that the analysis results are accurate and the data has been interpreted correctly.
- **Responsible Access:**
  - a) Accessing and using Bonsucro organisational data only as required in their role.
  - b) Reporting any breaches of Bonsucro information in a timely manner according to procedures defined.
  - c) Using for limited, specifically stated purposes
  - d) Using in a way that is adequate, relevant and not excessive
  - e) Maintained in an accurate state
  - f) Kept for no longer than is necessary

In addition to these principles, Bonsucro's confidentiality policy (LINK TO BE ADDED) shall be followed by Data Stewards to ensure the integrity of data is upheld.

## 3) Bonsucro Governance Principles for Data

The Bonsucro Governance Principles for Data apply to all forms of data governance and planning, and guide governance decisions, processes and systems development. DGC shall ensure that a set of principles for data approved by the Executive and compatible with other governance requirements is agreed. The application of such principles and broader aspects of data governance is supported by DGT under the supervision of the DGC.

The principles help stakeholders and staff make data-related strategic and tactical decisions within and across Data Domains. The DGC approved Principles are summarised below.

- **Data Privacy** – data as it is entered into systems (electronical or non-electronical) is owned by the originator of the data. Appropriate tools and systems and approval mechanisms must be in place to ensure:
  - a) data storage is approved in line with all legal requirements by the owner
  - b) data is anonymous whenever it is published unless specific consent from the data originator has been obtained.
  - c) data manipulation is appropriately monitored / logged
  - d) data usage is appropriately approved by the data owner
- **Data is an Asset** - Data is an asset that has value to Bonsucro and its members and is managed accordingly. Data needs to be valued and protected.
- **Data is Accessible** - Data is accessible for Stewards to perform their agreed functions when and how they need it.
- **Bonsucro Common Vocabulary and Data Definitions** - Data is defined consistently throughout Bonsucro, and the definitions are understandable and available to all Stewards.
- **Data Security** - Data, whether stored, in transit or in use, is protected from unauthorized use and disclosure to ensure the required levels of confidentiality, integrity and accessibility.

## 4) Law, regulations and standards

Nothing in this policy precludes the lawful and/or authorised disclosure of organisational data to external organisations, governmental agencies, or authorised individuals as required or permitted by legislation. Bonsucro’s policies on disclosure and personal data should be consulted as appropriate, available through the [website](#). Bonsucro’s agreements with service providers, licensed certification bodies and other relevant advisors and consultants must include appropriate levels of confidentiality requirements and legal obligations to ensure the effective implementation of this policy.

Data must be managed with due regard to all applicable laws and regulations, as well as relevant best practice frameworks and any specific contractual obligations of Bonsucro (e.g., Non-Disclosure Agreements; other specific obligations included in contracts Bonsucro is a party of). Of note is the General Data Protection Regulation (GDPR), (EU) 2016/679, which is a legal framework that sets guidelines for the collection and processing of personal data by organisations, businesses or the government.

Everyone responsible for using personal data has to follow the GDPR, on which basis [Bonsucro Privacy Policy](#) has been built.

Data that does not fall into the GDPR definition of personal data shall also be managed with the same level of scrutiny as outlined in the Bonsucro Confidentiality Policy

Reference shall also be made to ISEAL where collaboration or other models may prove useful to Bonsucro.

## 5) Data sharing

All data is owned by the originator of the data. If at any time it would be beneficial to the originator and Bonsucro to share that data to a third party, outside of any existing agreements, a data sharing agreement will be created. This agreement will be created and signed by the originator and Bonsucro. It will define the intended purpose and goal for data sharing, provide a basis for understanding what data is required and headline the principles of data management expected. The underlying principles of the data sharing agreement will mirror Bonsucro’s governance principles for data (3)

## 6) Change Management

Any modifications to the approach, and the structure/use of master data, and systems used for Data management will be discussed through DGC.

## 7) Data Strategy

A Digitisation of Bonsucro road map shall be maintained. This sets priority and direction for data and data-related activities.

## 8) Technology for Data

DGC shall specify and prioritise the requirements and strategy for data management. The technology to implement those requirements and strategy shall be specified and implemented as part of the overall Digitisation of Bonsucro road map and Improvements.

## 9) Data Classification

DGC shall ensure that there is an approved Data Classification classifying each data element according to an agreed Bonsucro definition; an example of this definition might be Sensitive (high risk), Restricted (medium risk) and Public (low risk).

## 10) Organisational Data Model (Data mapping)

DGC shall oversee Bonsucro's Organisational Data Model, including the definition of different types of organisational data, and defining the standard for documentation of data elements. This includes documenting data flows between systems and organisations so the origin of data elements can be traced through organisational systems and processes.

## 11) Third party access and use of data

This policy applies to how Bonsucro, as an organisation, manages data. Third parties who are part of Bonsucro's data chain are expected to follow the principles set out in this document and treat the data as set out in individual agreements

## Appendix 1: Terms and definitions

| Term                            | Definition  |
|---------------------------------|---|
| Access                          | <p>Access is the right to read, enter, copy, query, download, or update data</p> <p>Bonsucro employees or agents must be granted access to data elements according to the procedures specified by the expert of that data and consistent with applicable laws and regulations.</p> <p>Users desiring data shall submit a completed form requesting access and acknowledging responsibility to the Steward of that data. The form contains the appropriate level of approval as determined by the Steward. If approval is granted, the Custodian will enter the User’s credentials into a registration system, allowing access. If warranted, the Steward or Custodian will seek additional approvals. The DGC will set policy for access to organisational data.</p>  |
| Compliance                      | <p>The Steward is ultimately responsible for compliance with applicable legal and regulatory requirements, and with Bonsucro policies and procedures, including specific policies or procedures established by DGC. Stewards must be knowledgeable about applicable laws and regulations to the extent necessary to carry out the stewardship role. Stewards must take appropriate action if incidents violating the above occurs.</p>  |
| Data                            | <p>Data in all its forms is subject to DGC governance (including but not limited to machine readable data, data in electronic communication systems, data in print, and backup and archived data on all media).</p>   |
| Data Classification             | <p>Data classifications, categorize Organisational data based on the level of potential risk if the data were exposed. A data classification matrix is maintained that includes the security classification of the data and identifies a domain steward and for the data. Access to data will be granted based on these classifications and the role and job requirements of the requestor. It is possible for data to be combined or gathered in specific ways that reveal information that might become sensitive in aggregate.</p>   |
| Data Collection and Maintenance | <p>Ensuring the accuracy and quality of data (access control, backup, etc.) and implementing programs for data quality improvement.</p> <ul style="list-style-type: none"> <li>• Developing procedures for standardizing code values and coordinating maintenance of look-up tables used for Organisational data.</li> <li>• Consulting with data consumers / users to determine appropriate data sources</li> <li>• Determining update precedence when multiple sources for data exist.</li> </ul> <p>Determining the most reliable source for data</p>  |
| Data management                 | <ul style="list-style-type: none"> <li>• Ensuring policies and procedures that manage Organisational data as a Bonsucro resource are established and these are communicated to the Bonsucro community by the Data Stewards. These policies and procedures should include:</li> <li>• Specific goals, objectives, and action plans to implement the policy and monitor progress in its implementation</li> <li>• Identification of data entities and data sources that comprise Organisational data and maintaining these entries in the IT Service Knowledge Management System or as Configuration Items in a Configuration Management Database. As this is an ongoing process there needs to be a regular and at least annual review of entries</li> <li>• Prioritized management of Organisational data including identifying – in consultation with relevant consumers and users of the data – which data is most critical and assigning appropriate management priorities to all data entities and sources</li> <li>• Acceptable delivery modes for transmitting Organisational data</li> </ul> |



|               |   |
|---------------|---|
| Data Stewards | <p>All staff at Bonsucro who come into contact with data at Bonsucro, to compile, to receive, to edit or to pass on, is a Data Steward</p> <p>Stewardship can be considered as</p> <ul style="list-style-type: none"> <li>• Taking responsibility for the survival and wellbeing of something that is valued.</li> <li>• The responsibility for taking good care of resources entrusted to one.</li> <li>• The science, art and skill of responsible and accountable management of resources.</li> <li>• Being responsible for managing property or resources; the individual's responsibility to manage his/her life and property with proper regard for the rights of others.</li> <li>• The practice of managing or looking after the wellbeing of something.</li> </ul> <p>Data Stewardship should be considered as above. It is concerned with taking care of data assets that do not necessarily belong to the stewards themselves. Data Stewards represent the concerns of others. Some may represent the needs of the entire organization. Others may be tasked with representing a smaller constituency: such as a faculty, directorate or department.</p> <p>By virtue of their positions, Stewards of organisational data have the primary administrative and management responsibilities for segments of organisational data within their functional areas.</p> <p>Specific responsibilities also include:</p> <ul style="list-style-type: none"> <li>• Access: With guidance from the respective Expert and in collaboration with technical support staff and Bonsucro Counsel, stewards are expected to undertake appropriate procedures that satisfy specified information security requirements including legal and compliance obligations as well as applicable Bonsucro policies.</li> <li>• Coordination:</li> <li>• Data Collection and Maintenance: Collecting and maintaining complete, accurate, valid, and timely data for which they are responsible</li> <li>• Data Security: Administering and monitoring access in collaboration with technical support staff, defining mitigation and recovery procedures. Reporting any breaches of Bonsucro information in a timely manner in accordance with the Incident Management Policy. Coordinating data protection with the Information Security Office as necessary</li> <li>• Documentation: Writing the documentation for each data element based upon stewardship requirements, policy, and best practices. This documentation will include, at a minimum, the data source, data provenance, data element business name, and data element definition. It should also include documentation of reporting processes, and the basis for data categorisations within these processes (for example, categorisation of student and staff activity, or of expenditure data).</li> </ul> |
| Data Storage  | Documenting official storage locations, archiving and retention requirements for data elements.   |

|                                       |   |
|---------------------------------------|---|
| <p>Domain Experts/Project experts</p> | <p>Domain Experts/Project experts are Bonsucro staff who have operational level responsibility for the capture, maintenance, dissemination, and storage of specific organisational data.</p> <p>Experts look after particular sets of data, such as “people data”, “member data”, and so on. For example, the HR Director is a suitable Steward for People Data. Experts shall be responsible for the management of data under their oversight, under the direction of the DGC.</p> <p>Use of data from one domain by another (sometimes known as transformed data) shall comply with the direction of the Experts for the data as per the source. For example, the rules, definitions and treatment of people data, wherever that data may be held shall comply with the rules, definitions and treatment established by the people data domain owner.</p> <p>Experts are responsible for coordinating their work with other Bonsucro offices associated with the management and security of data, such as the Information Security Officer and IT staff.</p> <ul style="list-style-type: none"> <li>• Access: Approving requests for access to organisational data within their functional area, specifying the appropriate access procedure, and ensuring appropriate access rights and permissions according to classification of data.</li> <li>• Communication: Ensuring that Consumer/Users of the data for which the Stewards are responsible are aware of information handling procedures.</li> </ul> <p>Compliance and Data Security: The Steward is ultimately responsible for compliance with applicable legal and regulatory requirements, and with Bonsucro policies and procedures, including specific policies or procedures established by DGC. Stewards must be knowledgeable about applicable laws and regulations to the extent necessary to carry out the stewardship role. Stewards must take appropriate action if incidents violating any of the above policies or requirements occur</p> <ul style="list-style-type: none"> <li>• Data Classification: Classifying each data element according to Bonsucro definition - Sensitive (high risk), Restricted (medium risk) and Public (low risk).</li> <li>• Data Lifecycle and Retention: Ensuring appropriate generation, use, retention, disposal, etc., of data and information consistent with Bonsucro Policies, among them the Information Security Policy and standards for disposal.</li> <li>• Data Manipulation, Extracting and Reporting: Ensuring proper use of Organisational data and recommending appropriate policies regarding the manipulation or reporting of Organisational data elements (in line with reporting standards established by the DGC) and implementing business unit procedures to carry out these policies.</li> <li>• Data Quality, Integrity and Correction: Ensuring the accuracy and quality of data (access control, backup, etc.) and implementing programs for data quality improvement. Developing procedures for standardizing code values and coordinating maintenance of look-up tables used for Organisational data. Consulting with data consumers / users to determine appropriate data sources. Determining update precedence when multiple sources for data exist. Determining the most reliable source for data.</li> <li>• Data Storage: Documenting official storage locations and determining archiving and retention requirements for data elements.</li> <li>• Education (Training and Advice): Ensuring that education of employees responsible for managing the data is provided in reporting standards, data retention, data handling, and data security.</li> </ul> <p>Policy Implementation: Establishing specific goals, objectives, and procedures to implement the policy and monitor progress toward implementation.</p> |
|---------------------------------------|---|

|                                    |  |
|------------------------------------|--|
| Education<br>(Training and Advice) | Ensuring that education of employees responsible for managing the data is provided in reporting standards, data retention, data handling, and data security.   |
| GDPR                               | <p>This DGC policy is underpinned by the Bonsucro’s commitment to complying with the GDPR (General Data Protection Regulation (EU) 2016/679)</p> <p>The GDPR sets out seven key principles:</p> <ul style="list-style-type: none"> <li>• Lawfulness, fairness and transparency</li> <li>• Purpose limitation</li> <li>• Data minimisation</li> <li>• Accuracy</li> <li>• Storage limitation</li> <li>• Integrity and confidentiality (security)</li> <li>• Accountability</li> </ul>   |
| Organisational data Model          | Ensuring the creation and maintenance of an Organisational data model and defining the standard for documentation of data elements. This includes definition and documentation of data entities, data flows between systems and organisations so that the origin of data elements can be traced through the organisational systems and processes.  |
| Organisational data                | <p>Data that is created, acquired, or maintained by Bonsucro employees in performance of official administrative job duties.</p> <p>Organisational data is a subset of the Bonsucro's information resources and administrative records and includes any information in print, electronic, or audio-visual format that meets the following criteria:</p> <ul style="list-style-type: none"> <li>• Acquired or maintained by Bonsucro employees in performing their job duties.</li> <li>• Relevant to planning, managing, operating, or auditing a major function at the Bonsucro.</li> <li>• Created, referenced or required for use by more than one organizational unit:</li> </ul> <p>Included in official Bonsucro administrative reports or official Bonsucro records</p> |
| ISEAL                              | ISEAL is the global membership association for credible sustainability standards.  |

## Appendix 2: REFERENCE DOCUMENTS supporting / data governance policy (external) and procedure (internal)

External = on website = list in DG policy

Internal = staff only = list in DG procedure

| Latest version of                            | Relates to Data set / domain?                        | External / Internal  | Status   |
|--|--|----------------------|--|
| Bonsucro Strategy                            | **Certification<br>**Membership<br>**Commercial      | External             | Current version published  |
| Privacy Policy                               | **Personal Data                                      | External             | New version recently published   |
| Confidentiality Policy                       | ** Commercial  | External             | Current version published  |
| Certification Protocol                       | **Certification<br>**CBs Accreditation and Oversight | External             | Current version published – under review: new version to be published in December 2021 |
| Accreditation and Oversight Procedure        | ** CBs Accreditation and Oversight                   | External             | Current version published – under review: new version to be published in 2022          |
| Code of Conduct Reporting Guidelines         | **Membership   | External             | New version recently published   |
| Credit Trading Platform Terms and Conditions | **Certification<br>**Membership<br>**Commercial      | External             | Current version published  |
| Grievance Mechanism                          | **Certification<br>**Complaints                      | External             | New version recently published   |
| Calculator /Connect User guides and videos   | **Certification<br>**Commercial                      | External suspended   | Current version published  |
| Claims & Labelling Rules                     | **Commercial   | External             | Current version published  |
| Claims & Labelling Procedure                 | **Commercial   | External             | Current version published  |
| Logo & Certification Mark License Agreement  | **Commercial   | External             | Current version published  |
| M&E Policy                                   | **Certification<br>**Membership<br>**Commercial      | External             | Current practice on website  |
| Data methodology for outcome report          | **Certification<br>**Commercial<br>**Membership      | Internal             | Under development  |
| Impact Project Guidelines                    | **Membership<br>**Commercial                         | Internal             | Under development  |
| Claims & Labelling Procedure                 | **Commercial   | Internal<br>External | Current version published  |

|   |   |                             |   |
|---|---|-----------------------------|---|
| Membership Handbook   | **Membership  | Internal                    | V1 In use   |
| Assurance Handbook  |   | Internal                    | To be developed   |
| Communications handbook   | **Certification<br>**Commercial<br>**Membership<br>**Personal Data      | Internal                    | To be developed.<br>(To detail how information is collected and published on website, social media, etc., with the relevant authorisation)  |
| Calculator / Connect internal manual  | **Certification<br>**Commercial   | Internal                    | Under development<br>(To include how formulas work, how the tools are administrated and reviewed, how data is extracted, transferred and analysed, who is in charge, data control points. |
| Salesforce user guide   | **Certification<br>**Commercial<br>**Membership<br>**Personal Data      | Internal                    | Under development<br>(Should not overlap info already in Membership handbook or Assurance handbook)   |
| SharePoint user guide   | **Certification<br>**Commercial<br>**Membership<br>**Personal Data      | Internal                    | To be developed.  |
| Certification Body Accreditation Agreement  | **Certification<br>**CBs Accreditation and Oversight<br>**Personal Data | External limited to CBs     | Current version published – under review: new version to be published in 2022   |
| Training Provider License Agreement   | **Training<br>**Personal Data   | External limited to TPs     | Current version published – under review: new version to be published in 2022   |
| Training Provider Manual  | **Training<br>**Personal Data   | External limited to TPs     | Current version published – under review: new version to be published in 2022   |
| Other agreements? consultants, staff, members, certificate holders, IT service providers, NDAs. | **Personal Data<br>**Company data/project specific data                 | External limited to parties | To be added when applicable   |