



ZAMBIA ROAD SAFETY TRUST

Data Protection, Privacy and Responsible Photography Policy

Responsible handling of personal data, images, interviews and programme records.

Organisation	Zambia Road Safety Trust (ZRST)
Document type	Public policy download
Version	Version 1.0 - July 2026
Policy owner	Executive Director, with Board oversight
Review cycle	Annual review, or earlier if required by law, donor requirements, Board decision or operational risk.

Relevant Zambian legal and governance framework

This policy is intended to support ZRST compliance and good practice in line with: Data Protection Act, 2021; Children's Code Act, 2022; Non-Governmental Organisations Act, 2009. Where a law, donor agreement or regulator requirement imposes a higher standard, that higher standard applies.

1. Purpose

ZRST collects and uses information for road safety programmes, school engagement, training, donor reporting, research, advocacy, events and communications. This policy sets minimum standards for handling personal data, photographs, video, interviews and project records.

2. Personal data ZRST may handle

- Names, contact details, job titles, organisation details and meeting records.
- Training attendance, workshop participation, consent forms and stakeholder lists.
- Photographs, video, audio, interviews and field notes.
- School, community, road-user and project data required for implementation or reporting.
- Financial, supplier and staff information needed for administration and audit.

3. Principles

- Collect only information that is necessary for a legitimate ZRST purpose.
- Use personal information fairly, responsibly and transparently.

- Protect sensitive data and do not share it unnecessarily.
- Respect the dignity and privacy of children, communities, partners and staff.
- Retain records only as long as required for legal, donor, audit, programme or accountability purposes.

4. Consent and photography

Photos and videos may be used to document road safety work, training, school-zone improvements and project accountability. ZRST should seek permission where practicable, particularly for children, schools, identifiable participants and interviews. Images must not be misleading, exploitative or unsafe.

5. Children and sensitive information

- Do not publish a child's full identity, contact details, home address or school route where this creates risk.
- Avoid images that stigmatise, expose, humiliate or endanger children.
- Use group or contextual images where they meet communication needs without unnecessary identification.
- Follow school permissions and safeguarding rules when documenting activities involving pupils.

6. Data security

Digital records should be stored in controlled folders or approved systems. Physical records should be kept securely. Access should be limited to people who need it for ZRST work, donor reporting, audit, governance, legal compliance or project accountability.

7. Sharing information

ZRST may share information with donors, partners, auditors, government institutions, schools or competent authorities where there is a legitimate project, reporting, safeguarding, legal or accountability reason. Sensitive personal information should not be shared publicly without a clear purpose and appropriate safeguards.

8. Breaches and concerns

Loss, unauthorised disclosure, misuse of images, accidental publication or suspected data breach must be reported to management promptly. ZRST should assess risk, take corrective action and communicate with affected parties or competent authorities where appropriate.

Document control

This public policy download is issued for transparency and due-diligence purposes. ZRST may maintain more detailed internal procedures, registers, forms and approval records to operationalise this policy. This document does not replace applicable Zambian law, donor agreements or instructions issued by competent authorities.