



## **INTERNATIONAL COMMITTEE OF MILITARY MEDICINE**

### **REGULATION OF INTERNAL ORDER**

#### **ON DATA MANAGEMENT, PRIVACY AND USE OF SOCIAL MEDIA**

##### References :

- a. Statutes of ICMM CIMM
- b. Applicable international legislation on data protection
- c. Applicable international legislation on privacy
- d. Applicable international legislation on social media and the use of images
- e. **General Assembly of the ICMM in Brisbane, Australia, September 2024**

##### 1. Scope of this regulation:

Since the missions of the ICMM, envisage a dynamic and worldwide range of contacts through communication tools during activities, this regulation of internal order aims to:

- a. Set out the data protection and management policy within the ICMM.
- b. Establish and provide directives concerning the safeguarding of privacy and the proper management, utilisation, and accountability for social media, as well as the handling of multimedia content pertaining to ICMM operations and its members.

##### 2. General rules :

- a. ICMM, with its head office in Belgium, falls under the purview of the European General Data Protection Regulation. Consequently, a data policy has been formulated and appended as Annexure "A" in compliance with the said regulation.
- b. ICMM activities conducted by ICMM member states outside the European region shall adhere to their respective national or continental regulations, with the organizing entities assuming accountability. In situations of regulation inconsistencies, the most stringent standard shall be upheld.
- c. In addition to the stringent data protection and management regulations, ICMM and its Member States shall afford particular consideration to the privacy rights of delegates and participants engaged in activities.



- d. Although privacy rules are even more diverse all over the world than data regulations, all ICMM Member Nations will respect the ICMM rules and guidance for the use of person-identifiable content, as described in Annexure “B”.

3. Specific rules for the use of social media for ICMM related activities

- a. The use of social media related to the ICMM organisation or ICMM activities must always contribute to the ICMM vision and mission and shall at all times comply with the ICMM values.
- b. Posts on social media concerning ICMM organizations or activities must align with these entities or events. No posts unrelated to ICMM shall be permitted under the banner of ICMM.
- c. For ICMM world and regional congresses, the congress director is accountable for the content and financial aspects of the posts created by him or his team.
- d. For all other posts regarding ICMM, the secretariat of ICMM ([info@icmm-cimmm.org](mailto:info@icmm-cimmm.org)) will serve as the contact point and coordinator.



## **Data Policy**

### References :

- a. GDPR – EU regulation 2016/679, published : [PbEU](#) 2016, L 119/1
- b. ICMM statutes

### 1. Scope of this policy :

This policy aims to specify and clarify irrefutably how ICMM deals with, storing and managing the Personally Identifiable Information (PII) of all its member States and state representatives.

### 2. Collection of data :

- a. Data to be collected.

ICMM collects data required to comply with its vision and mission with respect to its values. This data can be non-PII (e.g. office mail coordinates) or PII data, including names and contact details of the National Delegates. For this policy, the intended PII data are considered non-open-source data. If PII data are however or become stated in open sources, ICMM will thereafter no longer be responsible for such data.

- b. Collection of data:

When a member state joins ICMM, the contact details of the Surgeon General and the National Delegate of the state to ICMM are collected. When these details should change, the member state must communicate swiftly the new contact details to the secretariat general of ICMM.

The secretariat general can update these details during the year when deemed necessary for the good functioning of its office.

- c. Data agreement:

By requesting and accepting membership of ICMM, a member state accepts the collection, storage and management of the non-PII and PII data related to the Surgeon General, the National Delegate and any other persons necessary for the fulfilment of ICMM's vision and mission. This will be explicitly mentioned in the admission formula. Upon becoming a member, the national delegate will receive a copy of this policy.



For existing members, a copy of the policy and the acceptance thereof by the member state (through the national delegate) will be handed over but however no later than at the General Assembly.

### 3. Storage of data

#### a. Public space for only non-PII data

The public space and storage folders which are open to non-members,

#### b. Private organisation space

In this space and these folders managed by the secretariat general, all necessary data and information can be stored to ensure the proper functioning of the ICMM and to allow effective communication between the ICMM bodies and the ICMM members.

#### c. Timeframe

The non-PII data collected by ICMM will be stored without any time limit for as long as the technical possibilities allow.

The PII data of ICMM members collected by ICMM will be stored for as long as the person is holding his /her position. Upon vacating his /her position, anyone is entitled to request the deletion or transfer of his or her data. Normally, the PII data of the person vacating the position will be replaced by the new member's PII data holding the position.

The PII data of non ICMM members collected by ICMM will be stored without any time limit but will be subject to a yearly evaluation of the necessity of storage by the office of the Secretary General.

#### d. Stored data deleting Procedure.

The secretariat general by its office manager and/or executive secretary will be responsible for the deleting of all data which storage time has come to an end. In case of PII data, the Secretariat general will inform the respective persons of the removal of their data in writing requesting an email acknowledgement.



#### 4. Securing of data

##### a. Process.

The Secretary General of ICMM will take all necessary precautions to safeguard data and especially PII data collected and stored by ICMM.

He will designate a Data Protection Officer (DPO) responsible for the control and execution of these precautions. PII data of ICMM members and of non-ICMM members must be secured using limited folder accessibility of minimum 2 levels.

Yearly, the designated Data Protection Officer will submit recommendations and regulations about GDPR to the Secretary-General.

##### b. Responsibility.

Data protection is a matter of everyone's concern and responsibility. Within ICMM and the ICMM bodies, the secretariat general is the data controller and ensures the good collection and storage of all data. The secretariat general will not communicate PII data to members or non-members without the explicit written consent of the Data Protection Officer, designated by the Secretary General.

#### 5. Sharing of data with third parties (= part of "management of data")

##### a. Shared data

Non-PII data can be shared by simple agreement by the Secretary General or one of the delegated functionaries within the official bodies in the ICMM.

PII data of ICMM members cannot be shared with third parties without the explicit consent of the Secretary General on advice from the data protection officer and if sensitive the legal advisor of the ICMM.

##### b. Applicable Third parties

ICMM may only share collected data, non-PII and PII, with third parties who are willing and able to actively assist ICMM in achieving its vision and mission being *knowledge beyond borders & becoming the world's leading organisation in military medicine* and meeting the criteria as described hereunder.



Before sharing, any third party will however irrevocably and in writing subscribe itself and undertake to respect the values of ICMM (*independence, neutrality, impartiality, universality, reliability, quality and transparency*) including the management of the shared data.

c. Purpose(s) of sharing data with Third Parties

The purposes of ICMM for sharing data are to:

- (1) create more knowledge about the existence, vision and mission of ICMM
- (2) create more reaching-out possibilities in the world of medicine
- (3) create awareness of ICMM members and thereby to facilitate contact and possible support for their activities

d. Agreement between ICMM and third parties

Every intent to share data with a third party must be subject to a written, binding agreement between ICMM and the third party.

The written agreement will be prepared on advice from the legal advisor and be provided to approved third parties.

In the event of it being found that any third party do not comply fully and in all respects with the written agreement, all shared data shall be returned and removed by the third party.

The Secretary General will during the General Assembly, present the list of third parties with whom data is being shared and indicate the effects on ICMM of this sharing.

In the event of any ICMM member state or national delegate opposing the sharing of its/his /her data, ICMM and the third parties will respect the wish and all Third parties shall immediately remove all such related shared non-PII and PII data.

**Guidelines for the privacy respect and use of social media**

1. The right to privacy is universal and ICMM underwrites this. This is also part of creating a safe, comfortable environment where all participants in ICMM activities are reassured about the use of their details, in compliance with the ICMM values.
2. Publishing multimedia content featuring identifiable individuals, including tagging individuals, is permissible only with the consent of the individuals involved. It is recommended that such consent be obtained in writing, or at the very least, if not possible in a clear verbal manner.
3. Open and restricted social media :
  - a. With “open social media” is understood all ICMM social media pages and platforms accessible to everyone.
  - b. With “restricted social media” is understood all ICMM social media pages and platforms restricted to a limited and specific audience. The decision of membership falls within the competence of the administrator of the page/platform and the Secretary General.
  - c. Particular attention will be given to this difference and all roles must ensure a correct posting, meaning only “open” information can be posted on open social media, restricted information or posts shall never be posted on open social media.
  - d. If comprehensive posts concerning an ICMM activity are permitted on limited-access social media platforms, a brief general post regarding the same ICMM activity may be posted on unrestricted social media platforms.
4. Use of multimedia content :
  - a. Multimedia content can be actively acquired by ICMM representatives and organisers of activities (e.g. group pictures at a congress) or can be acquired by lecturers and presenters (e.g. PowerPoint presentations during lectures).
  - b. For the actively acquired content, it is necessary to comply with article 2 hereabove. This can be done during the registration phase for an activity or at the latest when taking the multimedia content.
  - c. Special attention will be given to all multimedia content used by lecturers, poster presenters or other kind of ad hoc contributing material by persons to an ICMM activity.

- d. Not only does all content need to be in compliance with the ICMM core values, but the content also needs to be in compliance with the national and international copyright legislation. The organiser of any ICMM activity will assume the responsibility for these requested compliances and in case of absence of one of these required compliances, will bear the eventual legal consequences.

## 5. Mandates and responsibilities within the Secretariat general group

It is recommended every organiser of an ICMM activity defines the roles and responsibilities within his organising committee as in the example of the Secretariat general group hereunder.

*Remark : not every social media provider will use all the herewith explained roles*

### a. Overview responsibilities / role

	Administrator	Editor	Moderator	Advertiser	Analist	Community manager
managing page roles and settings	V					
Editing the page and adding apps	V	V				
Creating and deleting messages on behalf of the page	V	V	V			
Send instant messages on behalf of the page	V	V	V			
reply to and delete comments and messages on the page	V	V	V			
delete or block people from the page	V	V	V			
create ads, promotions or promoted messages	V	V	V	V		
view statistics (income and other)	V	V	V		V	
view the page quality tab	V	V	V	V	V	
view who has published content on the page	V	V	V	V	V	
publishing and managing jobs	V	V				
enable job features for a post	V	V				
managing live chats	V	V	V			V





- b. *Administrator role* : This overall management role will be filled in by
- (1) The Press Information Officer (PIO) or acting PIO of the Secretariat general
  - (2) The Office Manager of the Secretariat general
  - (3) The Executive Secretary of the Secretariat general

In case of serious doubt, the Secretary General or his deputy will be consulted before publishing or other action on social media.

- c. *Editor role* : the editor role will be assumed by one of the administrators.
- d. *Moderator role* : the Secretary General or his deputy can decide to attribute the moderator role to one of the assistants and this on a permanent base or on a activity based rotations scheme (e.g. for a congress, a course, ..)
- e. *Advertiser role* : the ICMM Director of Public Relations will assume this role
- f. *Analist role* : the ICMM PIO or the acting PIO will assume this role
- g. *Community manager role*: the administrators will manage the community on social media. They will inform without hesitation the Secretary General or his deputy about any infraction or violation of this policy and the ICMM values in (live) chats.

## 6. Recommended Timelines for the use of social media

- a. The timewise use of social media must be just-in-time, consisting of several phases: continuously phase, pre activity phase, during activity phase, post activity. An activity can be the publication of a new IRAFMS, a course, a meeting, a congress, ...

- b. Continuously phase:

During this phase information on the ICMM vision, mission, values, structure, yearly calendar, ... can be posted. A twice per month publication can be taken as a base for posting on social media.

- c. Pre activity phase:

This phase is characterised by a build-up of posts regarding a specific event like a course or a congress. The purposes of these posts are to inform possible audience/attendees, to stimulate their curiosity and interest and finally to persuade and convince latecomers or doubters.



d. During activity phase:

The posts in this phase must display the different aspects of the activity (like ceremonies, scientific sessions, speeches, participation) and must be daily as long as the activity stands.

e. Post activity phase :

The posts in this phase will focus on the results, general appreciation AND in case of yearly or bi-annual activities, must contain already an invitation for the next edition.