

Responsible Data Guidance (In Progress)

ICRC HANDBOOK CHECKLIST - BASIC DATA PROTECTION PRINCIPLES

“ Is the Processing of Personal data involved / are individuals likely to be identified from the data processed? Does the information require protection even if it is not to be considered Personal Data?

Data Analysis/Data Project lead - Can you identify people with the processed data? If so, how? Can you remove the PII (personally identifiable info)?

“ Have (if applicable) local data protection and privacy laws been complied with?

Data Project lead - What are the local laws for the full cycle of the data project? (collection, analysis, storage, etc.)

“ For what purpose are the data being collected and processed? Is the Processing strictly limited to this purpose? Does this purpose justify the interference with the privacy of the Data Subject?

Data Project lead - Collecting the minimum data required is suggested. Does your project define the full purpose and data lifecycle use?

“ What is the legal basis for Processing? How will it be ensured that the data are processed fairly and lawfully?

Data Project Lead/ Data Analysis - Who has access to which data and what are the legal jurisdiction needs?

“ Is the Processing of Personal Data proportionate? Could the same purpose be achieved in a less intrusive way?

Data Project lead - Define a project that collects the data needed (minimize the collection of data.) Caveat - sometimes you don't know what type of data will help solve a problem until you assess. Nor do you know if the data will provide further insights to support the work.

“ Which parties are Data Controllers and Data Processors? What is the relationship between them?

Data Project Lead - Define who maintains the master dataset and who can process it. Ensure data project continuity throughout the data roles.

“ Are the data accurate and up to date?

Data Project lead - Define the frequency of data to be processed. Add a 'best before data' for the project. Do you have a data trail accompanying the dataset to track all the changes, access and key details?

“ Will the smallest amount of data possible be collected and processed?

Data project lead - Define the data survey content to the minimal amount. Consider who can have access to which data at each stage of the process.

“ How long will Personal Data be retained? How will it be ensured that data are only retained as long as they are necessary to achieve the purpose of the Processing?

Data project lead/IT - Define the data lifecycle and storage practices. Ensure there is a dataset trail with full data needs (eg)

- Data owner
- Data start date, data end date
- Data version control (data changes)
- Data storage
- Data users

“ Have adequate security measures been implemented to protect the data?

IT - Have people, processes and policies in place to support security measures.

Data project lead - Conduct data security review and quality checks on the whole data lifecycle.

“ Has it been made clear to individuals who is accountable and responsible for the Processing of Personal Data?

Data Project lead - Do you have a complete data checkin process/data trail?

“ Has information been provided to individuals about how their Personal Data are processed and with whom they will be shared?

Data Project Lead/Data collector - Train data collectors to explain the data process. Have diagrams and explanations ready and include a way for people to followup.

“ Are procedures in place to ensure that Data Subjects can assert their rights with regard to the Processing of Personal Data?

Data Project Lead/Data Collector - Train data collectors to explain the data process. Have diagrams and explanations ready and include a way for people to follow-up. Have quality control/people processes ready to be able to answer questions.

“ Will Personal Data be shared with or made accessible to Third Parties? How are individuals informed of this?

Data Project Lead/Data Collectors - Have processes in place for how data will be shared and with whom? Ensure that consent is adhered throughout this process.

“ Will Personal Data be made accessible outside the country where they were originally collected or processed? What is the legal basis for doing so?

Data Project lead - Who

“ Have Data Protection Impact Assessments been prepared to identify, evaluate, and address the risks to Personal Data arising from a project, policy, programme or other initiative?

Data Project Lead/ Data and/or Information lead - conduct a Data assessment as part of the TOR. Advise management and staff involved.

Dataset Check List

This should be in excel so that the data can be tracked.

Dataset directory - would it be possible to have people share a dataset checklist. We could have a master store (ideally online) of what data was collected, where and by whom.

ITEM/LOCATION	OWNER	DATE COLLECTED
Eg. Water pumps in schools/Kibera	eg.Kenyan RC, contact name, division	
Date Expired	Data Controller	
Eg. Collect data 1 every 2 years	Who to contact if data requested	
	Who has authority to share the data	

Data Analysis checklist

Source: Knight MOOC on Data Visualization

<https://knightcenter.utexas.edu/00-17861-learn-how-find-stories-data-register-now-free-online-course-data-exploration-and-storytelli>

The purpose of dataset trail/checklist/bibliography is to track the source of the data and all the changes. In the IT world, this is called “version control”. For the Data Project lead, this may include documenting who the data was shared with. Perhaps this could be added to each terms of reference and then be part of the project files.

Dataset Name	
Link to data source	
Link to storage source	
Who collected the data	
Who owns the data	
How was the data collected	
Sample Size	
Who was included/excluded from the sample	
When was the data collected	
When was the data last updated	
Why was the data collected	
Notes on data quality	
Notes on data usage conditions	