

# Girl Effect

Girl Safeguarding Policy:  
Digital Privacy, Security,  
& Safety Principles & Guidelines  
March 2016



**Copyright information:**

© 2016 Attribution-NonCommercial-ShareAlike

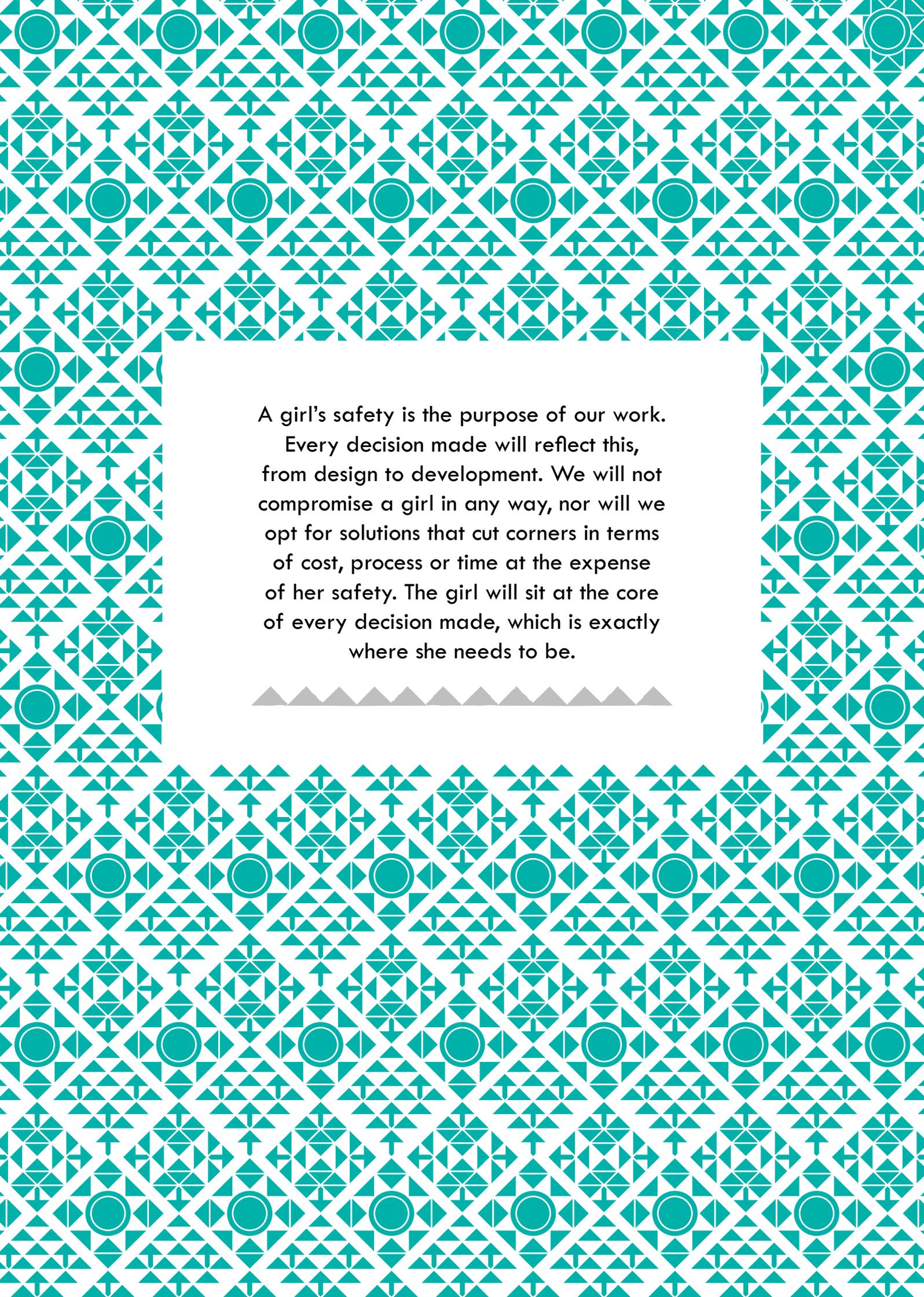
**License to Use Content.**

The contents of this toolkit are licensed as Attribution-NonCommercial-ShareAlike. You may remix, tweak, and build upon this content non-commercially, as long as you credit the author and Girl Effect and license any new creations under the identical terms.

For more information, please visit <https://creativecommons.org/licenses/>.

The Girl Effect brand, logo, and design, however, belong exclusively to Girl Effect. You may not use, re-use or display any trademarks, service marks, logos or designs contained in this document without Girl Effect's prior written consent.

Please contact [hello@girleffect.org](mailto:hello@girleffect.org) with any questions or comments!

The background of the entire page is a repeating teal and white geometric pattern. It consists of a grid of squares, each containing a smaller square with a circle inside. The spaces between these squares are filled with a complex arrangement of smaller triangles and squares, creating a dense, intricate design.

A girl's safety is the purpose of our work.  
Every decision made will reflect this,  
from design to development. We will not  
compromise a girl in any way, nor will we  
opt for solutions that cut corners in terms  
of cost, process or time at the expense  
of her safety. The girl will sit at the core  
of every decision made, which is exactly  
where she needs to be.

A horizontal line with a jagged, sawtooth-like pattern, rendered in a light grey color, positioned below the main text block.

# Preface

As Girl Effect has begun to integrate more digital tools and platforms into our work, we have become increasingly attentive to girls' digital privacy, security and safety, especially as we are helping many girls to access the Internet for the first time.

Knowing that girls and women face higher levels and specific forms of online discrimination and harassment as compared to boys and men, we want to do all we can to make girls' online experiences healthy and welcoming by creating safe environments for girls and by helping girls become more aware of how they can protect themselves online.

This first version of Girl Effect's Digital Privacy, Safety and Security Guide is aimed at providing our staff and partners with guidance on how we will protect girls who are using the digital tools that we create and/or promote. It is built on a set of principles that keep the girl and her privacy, security and safety at the center of all that we do.

The guide outlines how we will approach digital initiatives and programs involving girls. It offers a framework to better protect girls' personal information and privacy and to ensure that the content we provide or source does not put girls at risk. It lists the kinds of questions we need to ask our partners, sponsors or vendors before engaging in partnership agreements, and helps us consider how we go about collecting, using, storing and disposing of data that we gather as part of our digital tools and platforms, as well as when we are conducting monitoring, evaluation, learning and research activities.

The Guide was developed by Linda Raftree with support and input from different Girl Effect teams. It is based on research, focus group discussions with experts in the field, and input from girls themselves.

The contents of this guide are being published under a creative commons license so that others are free to use parts of it and/or build on it for their own work. We welcome comments and feedback at [hello@girleffect.org](mailto:hello@girleffect.org) so that we can continually improve in this area. We will update the guide as culture and habits shift, laws and frameworks change, and new tools and data science capabilities emerge.

We look forward to your thoughts and comments!

**Colman Chamberlain**

Director of Connectivity  
Girl Effect

# Table of Contents



<b>Introduction</b>	<b>6</b>
<b>Terminology</b>	<b>7</b>
<b>Girl Effect Digital Privacy, Security and Safety Principles</b>	<b>8</b>
<b>Guidelines and Checklists</b>	<b>11</b>
Data Privacy and Security	12
Platform Content and Design	15
Partnerships: Assets, Services, Sponsorship, Marketing, Brand, Advertising, Market Research	19
Research, Monitoring and Learning	23
<b>Sample Risk Matrix</b>	<b>27</b>

# Introduction

Girl Effect works to break the cycle of intergenerational poverty. We do this by connecting girls to each other and to the critical assets they need. We work to create lasting perception change by harnessing media in innovative ways and building social networks that develop girls' positive perceptions of themselves and shift how others see and value them.

Even when services and assets that girls need are available, existing prejudices and negative social norms prevent girls from accessing them. When a girl is better educated, has access to sexual and reproductive healthcare information and services, has access and control of economic assets, is safe from violence and exploitation, and has the capabilities and confidence to make positive choices, she can break the cycle of poverty. Girl Effect believes that perception change is a critical capacity-builder improve awareness and sensitivities of communities and families, and create an environment in which girls are better able to overcome barriers preventing them from accessing what they need.

We are a brand- and programs- led operation with offices in Rwanda, Ethiopia, Nigeria, a mobile platform live in over 30 countries, and headquarters in London.

Girl Effect is increasingly incorporating mobile devices and online platforms into our work. We believe that these devices and platforms can enhance our existing programs and help us to develop new ways for girls to gain:

- Greater knowledge, because mobile enables girls to access information;
- Improved self confidence, because mobile and social media platforms enable girls to discover and amplify their voices;
- Increased connection with peers, because mobile enables girls to access peer support networks;
- Better access to assets and opportunities, because mobile can enable girls to link to online and offline products, services and mentors.

We also believe that, as part of a broader approach, mobile can help to change perceptions about girls and their roles and place in society.

Mobile phones and other digital tools and platforms can contribute to girls' survival, development, protection and participation rights, yet they also bring new kinds of risk to girls. This Girls' Digital Privacy, Security, and Safety policy forms an integral part of Girl Effect's overall Girl Safeguarding Policy. It aims to develop mechanisms by which we can amplify the positive elements of mobile and social media while minimizing the risk of negative repercussions for girls or for Girl Effect.

# Terminology

## **Safety**

Refers to the safeguarding of girls who participate in a Girl Effect initiative or project/program.

## **Data Security**

Refers to the confidentiality, availability and integrity of data. Data security encompasses the practices and processes that are in place to ensure that data is not being used or accessed by unauthorized individuals or parties. Data security aims to ensure that the data is accurate, reliable and available to those with authorized access who need it. Data security includes aspects of collecting only the required information, keeping it safe, and destroying information that is no longer needed.

## **Data Privacy**

Refers to an individual's ability to know how their personal information will be collected, shared and used, and for the individual to exercise choice and control over its use. Data and information provided by a user and/or entrusted to an entity should be used in accordance to the agreed upon purposes. This includes selling, disclosing or otherwise accessing or sharing data with other parties without prior approval, agreement or consent.

## **Personal information**

Or Personally Identifiable Information (PII) is a term that has various meanings defined in law. For our purposes, we consider personal information to include (but not be limited to) information related to a mobile user and her use of mobile applications and services and information that a user may considered private even though it may not be strictly protected in law:

- Any data that is collected directly from a user (e.g. entered by the user via an application's user interface and may include name and address, credit card details)
- Any data about a user that is gathered indirectly (e.g. mobile phone number, email address, name, gender, birth data, location data, IP address, IMEI, unique phone ID)
- Any data about a user's behavior (e.g. location data, service and product use data, website visits)
- Any user-generated data held on a user's device (call logs, messages, user-generated images, contact lists or address books, notes, and security credentials)
- Any user-generated data volunteered on a social media platform that is only visible or searchable by the users of that platform (status updates, chat sessions, messages, comments, images, videos, notes)
- Any information collected from an individual for research purposes (videos, mobile surveys, audio recordings, photos)

## **Active consent**

Refers to the user being given a clear opportunity to agree to a specified and notified use of their personal information. This would apply to secondary non-obvious use of a user's personal information and/or applications that have additional privacy implications for users, such as an application that requests a user's location where such data is not necessary to the functioning of the application. Active consent must be captured in a way so that consent is not the default option.

## **Location data**

Is information that identifies the geographical location of a user's device, including Cell ID, GPS, Wifi or other less granular information such as village or town.

## **User**

Refers to the end user of a mobile application, platform, or any digital or web service. [1]

# Girl Effect Digital Privacy, Security and Safety Principles

The following broad digital privacy, security and safety principles should be upheld in any Girl Effect initiative that includes a digital component. These overarching principles form the framework for more detailed practices and standards aimed at achieving a safe and secure environment for girls. More detail and a series of checklists for different areas are found in the guidelines section of this document. A supporting risk matrix is provided as well.

## **We will ensure that our platforms and initiatives keep girls safe.**

We recognize that mobile and social media platforms and tools that engage populations under the age of 18 require stricter privacy and safety measures in terms of the collection, access and use of personal information. We also recognize that digital data is different in nature than paper-based data. For Girl Effect's digitally-enabled programming, we will put in place privacy protective default settings that limit the amount of information that girls can share. We will explore options to verify age and identity of our users, and we will tailor applications and platforms to appropriate age ranges. To the degree possible, we will offer girls the ability to deactivate and delete information if they decide they no longer wish to share it. Based on the sensitivity of the information that girls are sharing, we will determine whether special measures (e.g., locally hosted servers) are needed to protect girls' private personal information. We will not use geo-location options unless absolutely necessary to meet our objectives. We will comply with national laws on the protection of children. In order to ensure we are conducting full assessments and managing risk appropriately, we will fill out a risk matrix and put in place risk mitigation strategies for each of our initiatives.

## **We will protect girls' information.**

Girls may share personal information or ideas and opinions through our mobile or social media sites or other mobile-enabled programs. We will protect that information using reasonable safeguards appropriate to the sensitivity of the information and considering the most vulnerable or off-track girls as our baseline for determining privacy, safety and security policies and practices – meaning that we will err on the side of risk prevention and mitigation rather than on the side of greater potential risk. Privacy will be our default setting. We will conduct quarterly risk assessments to mitigate potential risks and to resolve any unanticipated risks that arise. We will also re-assess risk at key trigger moments, for example, when a new feature is introduced to a platform or when there is a major change in the external environment such as new legislation, a situation of escalating conflict or reports of government censorship. We will not use or share personal information and/or opinions provided by users of our platforms for research or other purposes without clearly informing girls that we are doing so.

## **We will put girls' privacy, protection and participation above our own institutional benefit.**

We understand that there will be trade-offs in our work, where we may have to make decisions that are beneficial to one aspect yet may present increased risk for girls. For example, we may be able to reach more girls via a particular platform, yet it may be less private, or we may be able to secure funding through a particular partnership, but that partnership may request data on girls in exchange. We will carefully analyze these situations, make decisions that favor girls in the short and long term over our own institutional goals, and document our decision making processes. Data we hold as part of Girl Effect is our and the girl's asset, and we will treat the trust and confidence girls place in us and our responsibility as data brokers with the utmost respect and care.

## **We will only use girls' personal information to meet legitimate business purposes.**

We will only access, collect, share, disclose and further use girls' personal information to meet legitimate business purposes, such as providing applications or services as requested by girls, or to otherwise meet

legal obligations. We will collect and store data with the most vulnerable girl and her situation and potential risk in mind. Partners will never be allowed to access girls' personal information unless it is for a legitimate business purpose to fulfill a Girl Effect goal or to support with Girl Effect program implementation.

**We will collect a minimum amount of personal information.**

We will only collect the information necessary to meet legitimate business purposes and to deliver, provide, maintain or develop applications and services. We will not keep personal information for longer than is necessary for those legitimate business purposes or to meet legal obligations. For each initiative, we will set data retention periods that stipulate when girls' data will be deleted or rendered anonymous. We will protect girls' personal information on handsets and wherever else we store or transmit personal data. We will follow best practices regarding the anonymization of data and establish clear policies for each project or initiative regarding who can access that data, for what purposes and for how long.

**We will provide girls with opportunities to exercise meaningful choice and control over their personal information.**

We will provide girls with information about and an easy means to exercise their rights over the use of their personal information. We will also provide girls with education and support to understand the meaning of personal information, privacy, security and safety so that they can become more informed about their rights. We will seek improved ways to explain to girls the implications of selling their data or otherwise providing opinions, content and information on online platforms or via mobile, and we will ensure that girls are consenting in an active and informed way. We will require girls' consent and opt in for any research, polls or surveys we may conduct for our partners or ourselves. We will never sell a girls' data without her clear permission and we will only sell girls' data if there is a clearly tracked and direct benefit in the form of a program or project accessible to a girl in her own geographic region. Any monetization of data will be returned to the project involved. (For more information on informed consent, see the Girls' Safeguarding policy.)

**We will treat content produced by girls and about girls with the greatest of respect.**

When we use content created by girls, we will share media ownership and attribution with girls as long as it will not place them at risk. In cases where content is not sensitive, we will use girls' first names, ages and district or region as identifiers (or a suitable level of geographical identification that will anonymize the girl). When content is sensitive or could put girls at risk, we will discuss this with them and take measures to anonymize the content to avoid causing any harm. Overall, whether content created by girls or stories and narratives about girls, we will follow Girl Effect's Communication Guidelines as related to the use of girls' names and images. We will provide girls with support in cases where their involvement as content producers or consumers causes any type of distress. This support may be online support or referrals to offline institutions that we have previously vetted.

**We will carefully vet any partnerships or endorsements.**

In keeping with our focus on girls as our top priority, we will ensure that any partnerships or endorsements are in the best interest of girls. We will allow brands to endorse Girl Effect programs overall or to sponsor content, but we will not allow any commercial product endorsements on Girl Effect platforms if we have not verified that the product is beneficial to girls. We reserve the right to not exclusively market or accept exclusive endorsements and the right to inform girls about alternative products and options, regardless of whether a particular partner or company is endorsing or providing funding or other benefits to Girl Effect overall. We will capture appropriate agreements and active consent before targeting or allowing any advertisements to girl users on Girl Effect platforms. We will conduct due diligence (see the Diligence Policy and Process Pack) on any potential partner, including a close review of our confidence in the partner's commitment to and ability to ensure data anonymity and a review to ensure that the potential partnership does not put girls at risk. We will ensure that we are fully confident in our partners' commitment to safety and to deliver against Girl Effect goals.

### **We will aim to avoid creating demand for services that cannot be met.**

Through mobile and online platforms, we will be able to reach more girls with vital information. If we are successful, we will generate greater demand among girls for certain rights and services. When launching content or platforms we will consider whether an appropriate response for girls is available and adjust our content strategies in order to avoid creating apathy or distress for girls or negative repercussions in the event that certain services are not available to girls in their local context. Before launching any program or platform in one of our high-touch markets, we will seek out and vet back-end and/or partner services that have the capacity to respond adequately to new demand that we generate through mobile outreach and engagement and inform them that they may see a higher demand for services. In our medium- and low-touch markets, when possible we will provide general information about where girls can find the needed services but we will likely not have capacity to directly engage in relationships with partners. If reliable services do not exist, we may make the decision not to proceed with generating demand or to tailor how we present content so that we do not generate demand that cannot be met.

### **We will determine an appropriate appetite for risk based on local context.**

Girl Effect seeks to bring about positive behavior changes among girls, families, communities and the wider public and to improve girls' lives through improved access to and use of information, connection, voice, and services. Global human rights documents and international standards will sometimes be in conflict with local culture, religion and tradition. Girl Effect's mobile and social media platform content will seek a balance between a) pushing the boundaries towards improved girls' rights and b) ensuring girls' safety and continued operations for Girl Effect. We will aim for an appropriately progressive phasing of our messaging and content so that we do not generate backlash against girls or Girl Effect.

### **We will be transparent about our privacy, security and safety policies and practices.**

We will be open and honest with girls and ensure they are provided with clear, prominent and timely information regarding our privacy, security and safety practices. Girls will be provided with information on who is collecting personal information about them, why personal information is being collected, what personal information is being collected and shared, with whom and for what purposes, and to whom their personal information may be disclosed. We will work to help girls to understand and make informed decisions about whether to use a mobile application or service and the potential consequences for doing so. We will ensure that our policies around consent are clear and articulated for girls, based on their levels of understanding and we will give girls easy choices on whether to provide information or subscribe to a particular service. We will keep record of girls' consent.

### **We will improve girls' awareness about and attention to privacy, security and safety.**

We understand that social media platforms (whether accessed via mobile phones or through computers) allow users to connect and share information with a community of users and/or the general public. These platforms can put girls at risk and we will include privacy-protective default settings and clear information and instructions so that girls understand and make informed choices about what they share. Because we may be working with girls who are newly accessing these types of platforms, we commit to implementing digital literacy and safety programming and publishing content that will help girls move along an online safety awareness journey, using data that we gather about girls' online behavior through our platforms to tailor safety-related content directly to girls. In cases where we direct girls to sites outside of our control, we will alert them to the potential privacy risks.

### **We will be accountable for our actions.**

We understand that we hold a heavy responsibility for the privacy, security and safety of girls who will use our platforms and participate in our initiatives. We will be accountable to girls, their families and communities for ensuring these principles are enforced, and we will stipulate how our partners share this responsibility in our partnership agreements. We will document processes and decisions made related to privacy, security and safety. We will offer clear channels for reporting abuse or violations of privacy, security and safety. We will put into place contingency plans for project failures, disasters and crises.

# Guidelines and Checklists



# 1. Data Privacy and Security

As a girl-centered organization that has respect for girls and their rights as a core value, we hold girls' privacy in high regard and are committed to the responsible collection, storage and use of girls' data and personal information. We see ourselves as trusted brokers of girls' data, and as such we work to ensure that we do not disempower girls or take advantage of girls' potential lack of understanding of the value of their personal information and data. We will operate transparently in terms of how we treat girls' data and personal information.

For our purposes, we consider 'data' to include the physical representation of information in a manner suitable for communication, interpretation or processing by human beings or by automatic means. Data can be numerical, descriptive or visual. It can be actively collected or provided (as in a survey), volunteered (as in a Facebook post or blog comment) or passively harvested (as in cookies or other digital data crumbs) and users may hold certain assumptions around privacy of data depending on how it is provided or from where it is harvested. Our policy aims to cover a range of scenarios.

Our core guidelines for responsible data collection, storage and use of girls' data and personal information cover areas of transparency, choice and control; privacy settings; data retention and security; national child protection laws; age verification and accountability and enforcement.

Guideline	Checklist
<p><i>Do not secretly access, collect or use girls' personal information.</i></p>	<ul style="list-style-type: none"> <li>• In situations where we collect girls' data and/or personal information, have we informed girls in meaningful ways:               <ul style="list-style-type: none"> <li>• Who is collecting their data or personal information</li> <li>• What personal information is being/will be accessed, collected or used</li> <li>• What personal information will be stored (on a device or remotely)</li> <li>• What personal information will be shared, with whom (including any third parties), and for what purpose</li> <li>• For how long we will keep personal information</li> <li>• Terms and conditions of use that affect a girl's privacy</li> </ul> </li> <li>• Have we developed simple, comprehensive and culturally relevant terms and Conditions (T&amp;C) that girls easily understand? And are we regularly informing girls of any T&amp;C changes? Is it easy for girls to make active and informed decisions about their privacy?</li> <li>• Can girls cease participating if they do not wish for their data and information to be used as described?</li> <li>• Are we providing simple ways for girls to access, correct or remove information they have previously uploaded or provided on Girl Effect platforms, or to contact platform administrators to request removal?</li> <li>• Have we ensured that girls can make decisions about third party collection, access and use of their data?</li> <li>• Have we determined ways that we will inform girls of any ongoing changes that impact their privacy?</li> </ul>
<p><i>Use privacy as the default setting.</i></p>	<ul style="list-style-type: none"> <li>• Have we made "privacy" and "opt-in" the default settings (rather than asking users to locate/activate private settings or asking them to contact us to "opt out")?</li> <li>• Are sharing settings and options clearly explained?</li> <li>• Have we incorporated automatic log-outs of the account after a period of time? Are active log-outs accessible / easy to do?</li> </ul>

	<ul style="list-style-type: none"> <li>• Have we ensured that girls are well informed of potential consequences or implications if they choose to change private settings to more public ones?</li> <li>• Have we disabled location data settings whenever possible?</li> <li>• Is there a way for girls to delete information (photos, statuses, account information) that they have previously shared, or to completely delete their accounts?</li> <li>• Have we worked out a way to manage lost passwords/lost log-ins?</li> </ul>
<p><i>Do not collect unnecessary data or data that could put girls at serious risk.</i></p>	<ul style="list-style-type: none"> <li>• Can we justify the need for every piece of data and personal information that we are collecting for either: <ul style="list-style-type: none"> <li>• Providing, operating or maintaining the application</li> <li>• Meeting an identified business purpose that the user is informed about</li> <li>• Meeting legal obligations</li> </ul> </li> <li>• Are we certain that our use of data is for purposes that girls would expect, based on the information we provided when they signed up or joined?</li> <li>• Are we confident that we have girls' active consent for any data or personal information that we've collected? <ul style="list-style-type: none"> <li>• Have we made girls aware of the period for which their consent is valid?</li> <li>• Have we made it clear how they can manage any consent they have provided?</li> <li>• Have we informed them of any consequences of withdrawing or withholding consent?</li> <li>• And have we ensured that girls can withdraw consent through simple means without undue delay or cost?</li> </ul> </li> <li>• Do we feel confident that girls have the maturity to consent to providing the information or data we are requesting? Have we used "a 13 year old girl" as our basic standard target user?</li> <li>• Are we confident that data being collected is not exposing girls to unnecessary risk or potential threats and danger (e.g., if it is related to religion, ethnicity, sexual assault, or other sensitive aspects)?</li> <li>• In cases where data being provided by girls is extremely sensitive (health information, violence-related, etc.), have we considered installing a secure local server to ensure that information is not stored longer than necessary or transmitted/stored in potentially insecure ways?</li> </ul>
<p><i>Ensure data is securely transmitted, managed and stored</i></p>	<ul style="list-style-type: none"> <li>• Have we followed technical measures and good business practice to ensure that girls' data is transmitted, stored and managed in a secure and safe way, including: <ul style="list-style-type: none"> <li>• collecting data on a password protected device</li> <li>• transmitting data via encrypted channels</li> <li>• destroying data when no longer needed and setting data retention and deletion parameters</li> <li>• anonymizing large data sets as early in the process as possible</li> <li>• encrypting data</li> </ul> </li> <li>• Have we taken measures to ensure that unique identifiers only apply to one user to avoid potential privacy implications (e.g., if a mobile phone or SIM card changes hands)?</li> <li>• Have we assessed whether authentication is required and have we applied it when needed/when possible in the context?</li> <li>• Have we ensured data that would be kept for longer periods or shared or data that could put girls at risk is sufficiently anonymized?</li> <li>• Have we established differential levels of access to girls' personal information and data based on sensitivity of and potential risk related to the data?</li> </ul>

<p><i>Review and comply with national laws.</i></p>	<ul style="list-style-type: none"> <li>• Have we reviewed national child protection and other relevant laws to identify those that are applicable (for example, marketing and advertising, research, age, content, blasphemy and libel, use of images)?</li> <li>• Are we compliant with national laws, especially those around child protection and data storage and retention?</li> </ul>
<p><i>Use age verification to minimize girls' risk.</i></p>	<ul style="list-style-type: none"> <li>• Have we integrated age verification prompts in order to control access or minimize inappropriate collection and sharing of girls' personal information?</li> <li>• Have we tested these prompts to ensure that they do not encourage girls to lie about their age?</li> </ul>
<p><i>Be accountable and responsible.</i></p>	<ul style="list-style-type: none"> <li>• Have we completed an overall risk assessment for the initiative to help us document our design and decision making processes and to indicate responsibility for different areas? (See Risk Matrix Format)</li> <li>• Have we informed girls where and how to lodge complaints about the use of their data and do we have procedures in place for receiving and responding to complaints?</li> <li>• Have we scheduled in a yearly review of our privacy and security practices, given how quickly the situation shifts and changes?</li> <li>• Do we have a plan in place for how users' data will be destroyed (or transferred to a vetted partner) if/when the project ends or the platform closes down? Have we informed users of this?</li> </ul>

## Additional resources:

- GSMA Mobile and Privacy: Privacy Design Guidelines for Mobile Application Development (2012) <http://gsma.com/mobileprivacy>
- Ways to Practice Responsible Development Data (2014) Responsible Data Forum (multiple authors). <https://responsibledata.io/ways-to-practise-responsible-development-data/>
- Oxfam's Responsible Program Data Policy (2014) [https://www.oxfam.org/sites/www.oxfam.org/files/file\\_attachments/story/oxfam-responsible-program-data-policy-feb-2015-en\\_1.pdf](https://www.oxfam.org/sites/www.oxfam.org/files/file_attachments/story/oxfam-responsible-program-data-policy-feb-2015-en_1.pdf)
- The White House (2012) Consumer Data Privacy in a Networked World: A Framework for Protecting Privacy and Promoting Innovation in the Global Digital Economy. Page 9: Consumer Privacy Bill of Rights. <http://www.whitehouse.gov/sites/default/files/privacy-final.pdf>
- ESOMAR Data Protection Checklist [https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR-Data-Protection-Checklist\\_January-2015.pdf](https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR-Data-Protection-Checklist_January-2015.pdf)

## 2. Platform Content and Design

As part of its work, Girl Effect will be designing platforms and products. We will also be producing, curating and sharing content and encouraging girls to do the same. For this reason, we need to be clear about how we will build girls' privacy and protection into our products and platforms. We also need to ensure that we protect girls from any inappropriate or harmful content, reduce girls' risk when they produce content for us, and help them stay safe when they participate and share their ideas, opinions and self-generated content through our platforms and products and/or those of our partners. Ensuring that our content does not create risk for girls, Girl Effect or its donors is our responsibility.

The following guidelines on platform content and design aim to help us navigate these areas and make decisions that reduce risk to girls as well as to Girl Effect overall.

Guideline	Checklist
<p><i>Foster debate on contentious topics; yet promote positions based on globally recognized girls' rights.</i></p>	<ul style="list-style-type: none"> <li>• Have we conducted sufficient research and insights work in our key markets (or where appropriate) to determine which issues girls face that we are best placed to address through mobile/digital platforms and tools?</li> <li>• Have we determined an appropriate appetite for risk (e.g., a progressive, yet respectful) for content in each market – one that supports perception change in and about girls without putting them at unacceptable risk for engaging with our content? Do we have a process in place to regularly review and adjust decisions about an appropriate level of progressiveness for our content choices?</li> <li>• Have we engaged girls and local partners to help us better understand the local context and to review content and strategy for potential missteps?</li> <li>• Are we (and partners who are managing or curating content) well informed and well placed to navigate the local environment and to avoid going too far too fast with progressive content and/or messaging?</li> <li>• Have we followed our translation guidelines to ensure quality and messaging is on point?</li> <li>• Have we assigned someone the role of moderating response to our content and alerting of any potential uproar or negative media?</li> <li>• Do we have a crisis plan in place with clear responsibilities assigned for handling anything that escalates to levels of concern?</li> </ul>
<p><i>Ensure that online or offline support exists for topics and issues that we approach.</i></p>	<ul style="list-style-type: none"> <li>• Have we identified and vetted online and/or offline partners who can provide girl-friendly services and support for topics and issues that we address in our content?</li> <li>• Have we provided links to these service providers in our stories or other content so that girls know where they can find support?</li> <li>• Have we informed these partners that they may experience a higher demand, and have we provided them with a clear estimate on what the volume of that demand might be?</li> <li>• Have we verified that partners have sufficient resources and back-end support to manage an influx in requests?</li> <li>• If sufficient resourcing does not exist, do we/our partners have an alternative plan for responding to the demand we are generating?</li> <li>• In countries/places where we do not have local partners, are we able to point girls to general information about relevant services (even if we have not vetted them)?</li> </ul>

	<ul style="list-style-type: none"> <li>• In situations of doubt, are we adjusting how we present content so that it is clear that we are not a helpline and that we can only share information and ideas for small steps towards addressing the issue?</li> </ul>
<p><i>Protect and respect girls who create content for Girl Effect platforms.</i></p>	<ul style="list-style-type: none"> <li>• Have we determined the level of potential risk that a story might bring to a girl and attributed the story accordingly? For example: <ul style="list-style-type: none"> <li>• If a story is highly sensitive, have we anonymized it sufficiently by changing details, using a pseudonym and age, changing the location, and not informing the girl that her story was used?</li> <li>• If a story is low-risk, have we ensured that we are only using a girl's first name, country, sketched image (no photo) and age?</li> <li>• With low-risk stories, have we ensured that girls have retained ownership of their story?</li> <li>• If a story is about a particular girl (rather than authored by girls) have we offered her a chance to review the story?</li> <li>• Have we discussed our policies and these levels of sensitivity and concern with each girl author and, where possible, with local advisors and/or parents/caretakers to ensure that we are making the best choice?</li> <li>• Do we have consent from girls to use their stories and images?</li> <li>• Have we established clearly how record of consent will be kept?</li> </ul> </li> <li>• Have we determined whether compensation will be offered, and have we ensured that it is fair and consistent for the locality and for all girl participants?</li> <li>• In cases where girls submit a story for publication (for example a 'share your story' feature, have we created clear and meaningful terms and conditions for the exercise?</li> <li>• Have we reviewed the content to ensure that: <ul style="list-style-type: none"> <li>• It follows Girl Effect's communication and content guidelines related to girls' photos?</li> <li>• It does not offer information that would enable someone to locate a girl (whether this appears in writing or in photos)?</li> <li>• It does not show girls and their communities as helpless victims?</li> <li>• It does not reinforce harmful gender stereotypes or harmful gender norms and ideologies?</li> <li>• Where possible, it includes positive and realistic female and male role models who act in ways that challenge harmful gender roles and norms?</li> <li>• It does not make unfounded accusations or lay one-sided blame?</li> <li>• Girls and their communities are at the center of the stories and their agency is celebrated?</li> </ul> </li> <li>• Have we established a content repository for girls' stories and have we ensured that it is secure and anonymous where needed?</li> <li>• Have we trained any and all press and production partners on our policy related to use of girls' content and girls' images?</li> </ul>
<p><i>Protect girls who share opinions, personal information and other content on our platforms.</i></p>	<ul style="list-style-type: none"> <li>• Have we reviewed and followed the data privacy and security guidelines in the previous section?</li> <li>• Have we signaled to girls the potential online and offline risks of participating and sharing information on the platform? Have we outlined how we can (or cannot) provide support and protection should a girl face backlash or other abuse for participating?</li> <li>• Have we established unique and secure IDs for girls and avoided mapping girls' identities on our platforms to publicly available information or public profiles? Have we ensured that a "single sign-in" option does not put girls at risk as more partners join onto Internet.org? (E.g., ensuring that a</li> </ul>

	<p>girls' phone number will not automatically connect to a photo that she has uploaded on a different online platform or social network).</p> <ul style="list-style-type: none"> <li>• Have we made it clear when users on our platforms can see or access girls' opinions, statuses, comments or other volunteered information and when this is strictly private [eg. on Facebook this would be the difference between a 'message' (private) vs a 'status update' (anyone the user is friends with can see it) vs a 'cover photo' (visible to anyone on the Internet)?]</li> <li>• Have we established ways to prevent girls from sharing their location, contact details and other types of personal information, and to flag when automated controls are not sufficient?</li> <li>• Have we provided clear and direct ways for girls to deactivate and/or delete data from applications and accounts, and ways to prompt them periodically to review their content and information?</li> </ul>
<p><i>Build safety into the design of the platform and content.</i></p>	<ul style="list-style-type: none"> <li>• In situations where we are developing online platforms, have we investigated the most common types of risk and abuse that girls face online or via mobile so that our platform design can respond to girls' most relevant risks?</li> <li>• Have we looked into girls' understandings of digital safety and their levels of digital and technical literacy in order to inform our platform design?</li> <li>• Have we established and promoted the platform's rules of engagement so that girls are clear what behaviors are expected on the site (e.g., bullying, racism, misogyny, ethnic slurs, etc. will not be tolerated; conversation is to be positive and productive; trolling is not permitted; etc.)?</li> <li>• Have we established a comments policy and code of content that users of a platform or site must agree to before being allowed to comment/volunteer content and ideas on the platform?</li> <li>• Have we assigned content moderators who have been trained on safeguarding where needed, especially as new platforms or content types are launched?</li> <li>• Have we provided moderators with clear guidelines on how to respond to potential disclosures (reports of abuse that has happened outside of our platform) or calls for urgent help (such as suicide)?</li> <li>• Is there a clear process for determining the severity of a particular comment/disclosure and for reporting it in cases where it falls under mandatory reporting requirements (either to local authorities or to Girl Effect)? Does the process include timelines and follow-up protocols as well as confidentiality guideline on who should be informed?</li> <li>• Have we put automated flags into place for tracking key words that may flag inappropriate comments/content/behaviors?</li> <li>• Are there simple and effective ways for girls to flag and report offensive content/comments, fake accounts and impersonators, spam/fraud or inappropriate behavior by users?</li> <li>• Have we established procedures for managing flags/reports of the above kind?</li> <li>• Have we established ways to socially reward users for engaging in the type of positive behaviors we want to encourage on the site?</li> <li>• Are we regularly sharing information and engaging girls in discussion about online/mobile privacy, security and safety and how online activities can lead to both online and offline risks for girls?</li> <li>• Have we established clear policies and rules around who can access back-end information on a platform or site to avoid unauthorized staff from accessing girls' data?</li> </ul>

<p><i>Be accountable and responsible.</i></p>	<ul style="list-style-type: none"> <li>• Have we completed an overall risk assessment for the initiative to help us document our design and decision making processes and to indicate responsibility for different areas? (See Risk Matrix Format)</li> <li>• Have we informed girls where and how to lodge complaints about the use of their data and do we have procedures in place for receiving and responding to complaints?</li> <li>• Have we scheduled in a yearly review of our privacy and security practices, given how quickly the situation shifts and changes?</li> <li>• Do we have a plan in place for how we will manage users' information, user-generated content, content and any support services if/when the project ends or the platform or service closes down? Do we have a plan in place for how we will inform users of this and make it easy for them to gain control or access over any content they have produced and shared on the platform? Have we thought of any way that services that users have come to depend on will be transferred to another entity or otherwise fulfilled?</li> </ul>
---	---

### **Additional resources:**

- GSMA Foundation (2012) Mobile and Privacy: Privacy Design Guidelines for Mobile Application Development. <http://gsma.com/mobileprivacy>
- Plan (2014) Working Together with Children and Young People for Safety in the Cyber World. <https://www.plan.org.au/~media/Documents/Sector%20Resources/Plan%20Cyber%20Safety%20Manual.ashx>

### 3. Partnerships: Assets, Services, Sponsorship, Marketing, Brand, Advertising, Market Research

Girl Effect needs partners in order to conduct its work. We may enter into partnership agreements on any number of levels. Partners may wish to jointly brand certain aspects of our platform. They may wish to use our reach and access to girls to conduct market or other research. They may wish to advertise on our platforms, and this could generate revenue and help our programs to be sustainable. They may be interested in accessing data about girls to inform their own marketing and outreach to girls for products and services. Girl Effect may also wish to enter into partnerships to provide girls with assets and services. We will want to ensure that partners have girls' best interest in mind and that we have followed certain guidelines related to the protection, security and safety of the girls we are working with. The guidelines below aim to help ask key questions around this wide variety of potential partnerships.

Guideline	Checklist
<p><i>Follow ethical practices for any online or offline services offered to girls in partnership with Girl Effect.</i></p>	<ul style="list-style-type: none"> <li>• Have we vetted any online or offline service providers to ensure that they have child protection and /or safeguarding policies and practices (both digital privacy, security, and security policy and general safeguarding policies) in place or that they are willing to adopt ours?</li> <li>• Have we conducted due diligence on partners and service providers to verify the quality of their services and capacity to provide services at the required level, and their financial and programmatic capacity and professionalism?</li> <li>• Have we scheduled periodic assessments of the service quality?</li> <li>• Do we feel confident that the services that we are linking girls to are the best option for them?</li> <li>• Have we considered short and long-term implications of directing girls to the services of these partners?</li> <li>• Have we established parameters and criteria related to sharing girls' data and information with these partners?</li> </ul>
<p><i>Follow ethical practices for any advertising that will appear via our platforms, assets and services.</i></p>	<ul style="list-style-type: none"> <li>• Have girls been informed about advertising features and are they aware of any ad-supported applications before downloading them?</li> <li>• If targeted ads are to be used, have girls been informed about how and where targeted ads will appear before providing personal information?</li> <li>• Has opt-in been clearly established as the default? Is it clear how girls can opt-out after initially opting-in? Is their personal data wiped off once they opt-out/account and its information deleted?</li> <li>• If it's a third-party that is doing the profiling or targeting, have girls been informed of this and provided active consent?</li> <li>• Have we ensured that any data collected for targeted advertisements about one topic/by one partner is not used for other purposes (for example, ads for other products or services) without girls' consent?</li> <li>• Have we ensured that we are not supporting or enabling partners to conduct viral marketing via our platforms?</li> <li>• Have we ensured that we are complying with any national or global laws related to advertising to children and adolescents?</li> </ul>

<p><i>Follow ethical practices for any market research that is done via our platforms</i></p>	<ul style="list-style-type: none"> <li>• Have we informed companies that they cannot follow up market research with marketing messaging and/or promotions for particular products?</li> <li>• Have we informed companies/researchers that they cannot obtain girls' personal data, but rather can only access girls' responses and regional location?</li> <li>• Have we ensured that we inform girls of any extra cost (including in airtime) if they participate in market research activities?</li> <li>• Have we considered conducting this research as a "micro task" for which girls could be paid by the researchers? Are there risks involved if we proceed that way?</li> <li>• Have we developed opt-in mechanisms for the research?</li> <li>• Have we reviewed any questions or surveys for suitability and brand alignment?</li> <li>• Have we informed companies/researchers that we do not allow free text responses (because of the extra screening it requires)?</li> <li>• Have we ensured that girls can skip answering any questions to which they do not wish to reply?</li> <li>• Have we conducted a trial/pilot of the research with a small group before launching, in order to adjust and make improvements?</li> <li>• Have we reviewed timing and spacing of any research so that we are not overloading girls with surveys and questions in this particular project or in combination with this and other projects?</li> <li>• Have we reviewed national laws to ensure that any research falls within legal limits? (e.g., in many countries children under 18 cannot participate in market research and those under 18 require parental consent to participate in any type of market or other research)</li> <li>• If national law does not exist, have we carefully reviewed the research questions and methods to ensure that they are age appropriate?</li> </ul>
<p><i>Follow ethical practices for any co-branding or sponsorship.</i></p>	<ul style="list-style-type: none"> <li>• Have we reviewed any endorsements or sponsorships by partners and ensured that they are in girls' best interest and do not create risk for girls or lock girls into an inferior product/service, including:             <ul style="list-style-type: none"> <li>• content, tools, services provided by a partner and hosted/linked to on any of our platforms</li> <li>• content, tools or services that we have endorsed on another platform</li> </ul> </li> <li>• If we are encouraging girls to use or access a product or service, have we compared it to other available products and services to ensure that we feel confident that the product/service is high quality and cost effective for girls?</li> <li>• Have we ensured that we are not giving exclusive rights to a company to market particular products and services and that we are retaining the right to inform girls about alternative products and services?</li> <li>• Have we considered any potential negative results in giving a partner exclusive rights to market or brand on our platform?</li> <li>• Have we ensured that a partnership agreement does not lock girls or us into payment schemes or long-term use of products or services and that girls can actively opt-in or out?</li> <li>• Have we conducted a thorough background check of the partner to ensure the partner meets our criteria and standards?</li> <li>• Do we feel confident that this partnership will not put girls at risk?</li> <li>• Does the partner have acceptable privacy and security approaches and protocols for girls' data?</li> </ul>

<p><i>Do not monetize girls' data without their knowledge, consent and direct benefit.</i></p>	<ul style="list-style-type: none"> <li>• Have we discussed any potential risks or ethical conundrums related to monetizing girls' data, and do we feel confident that we are not breaching any ethics by using girls' data?</li> <li>• Are we able to clearly articulate why and how girls' involvement or the use/sharing of girls' data is directly benefiting them (as opposed to primarily benefiting us or our partner)?</li> <li>• Have we informed girl users of any assets, services or platforms that we will be monetizing their data, how and why, and have we determined how we will seek their active consent for this?</li> <li>• Have we mapped out exactly how any revenue generated from girls' data will flow back into projects and programs that benefit the girls who are providing the data?</li> <li>• Are we following Data Privacy and Security guidelines from the previous section?</li> </ul>
<p><i>Ensure that any partnership agreements protect girls as well as Girl Effect.</i></p>	<ul style="list-style-type: none"> <li>• Have we stipulated in any agreements that companies/partners will not have access to girls' contact information?</li> <li>• Have we outlined exactly how girls' data and personal information will be secure and anonymized? Are we confident that partner respects this and has the capacity to ensure data anonymization?</li> <li>• Have we stipulated data privacy, data security, data retention, and data destruction timelines in the agreement? Have we established mechanisms to verify these? (See Section on Data Privacy and Security)</li> <li>• Have we ensured that we are protecting girls' personal information in practice and in the way we set up any systems or data sharing?</li> <li>• Does the partnership agreement include strict language that prohibits sharing of girls' data gathered through our platforms, assets and services? Are there clear and actionable consequences for breaching this?</li> <li>• Have we put in place a monitoring plan for ensuring the partner is complying with the stipulations in the agreement?</li> </ul>
<p><i>Be accountable and responsible.</i></p>	<ul style="list-style-type: none"> <li>• Have we completed an overall risk assessment for the initiative to help us document our design and decision making processes and to indicate responsibility for different areas? (See Risk Matrix Format)</li> <li>• Have we informed girls where and how to lodge complaints about the use of their data and do we have procedures in place for receiving and responding to complaints?</li> <li>• Have we scheduled in a yearly review of our privacy and security practices, given how quickly the situation shifts and changes?</li> <li>• Have we conducted due diligence on any/all partners and documented our decision-making process regarding selection of partners?</li> <li>• Have we discussed project close-out or finalization / exit strategies and plans with partners? Do we have a plan in place for the possibility that a business model will fail or require us to change the nature of the service or the conditions under which users signed up? Have we provided users with fair and accessible alternatives?</li> </ul>

## Additional resources:

ESOMAR World Research Codes and Guidelines:

Guide on distinguishing market research from other data collection activities [https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR\\_Codes-and-Guidelines\\_Maintaining-Distinctions-MRDM.pdf](https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR_Codes-and-Guidelines_Maintaining-Distinctions-MRDM.pdf)

**Passive data collection, observation and recording** [https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR\\_Codes-and-Guidelines\\_Maintaining-Distinctions-MRDM.pdf](https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR_Codes-and-Guidelines_Maintaining-Distinctions-MRDM.pdf)

**Interviewing children and young people** [https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR\\_Codes-and-Guidelines\\_Interviewing-Children-and-Young-People.pdf](https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR_Codes-and-Guidelines_Interviewing-Children-and-Young-People.pdf)

**Data Protection Checklist** [https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR-Data-Protection-Checklist\\_January-2015.pdf](https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR-Data-Protection-Checklist_January-2015.pdf)

## 4. Research, Monitoring & Learning

As we increase our use of digital tools for research, monitoring, evaluation and learning, a number of new privacy, security and safety risks arise for girls. It is critical that we consider these new risks and ensure that our practice does not put girls at risk. This portion of the guidelines aims to support those conducting qualitative and quantitative research with girls and those accessing girls' content and opinions online as part of research or monitoring, evaluation and learning (MEL) methods. It is less focused on simpler or one-off market research exercises conducted for or with partners (for market research, see the above section on partnerships).

This set of guidelines should be used together with the guidelines in Section 1 of this policy on data privacy and security, and if partners are involved, Section 3 on partners should be also reviewed and followed.

Guideline	Checklist
<p><i>Make sure everyone who needs to be informed about the research or MEL work is in the loop</i></p>	<ul style="list-style-type: none"> <li>• Are girls aware that the research is happening and why it's being conducted?</li> <li>• Have we looked at national legislation regarding the type of information that can be collected from children under the age of 18 and ensured that we are in compliance?</li> <li>• Are girls' parents and the wider community/community leaders aware that we are conducting research and do they understand why and what for?</li> <li>• Have we obtained informed and active consent from both girls and their parents/ caretakers, according to national law?</li> <li>• Have we found ways to ensure that girls are able to provide truly active and informed consent? (e.g., interactive or audio/video consent?)</li> <li>• Have we included the time period for which we will retain the data in the informed consent language girls are signing off on?</li> <li>• Have we informed girls and their parents/caretakers of any data that we may share with third parties and obtained consent for this?</li> <li>• If research is being done face-to-face, using digital devices to capture information, have we secured all the necessary permissions and permits, especially in places where devices may raise eyebrows or questions?</li> <li>• If research is being done through data mining of girls' accounts or information they have volunteered through an application or a social network, have we explained the research and its nature to girls and obtained their active and informed consent?</li> <li>• Where appropriate, has a participatory risk assessment been done involving girls and others who may have a stake in the research?</li> <li>• Have we explored attitudes and perceptions around the use of digital devices and filming/photos to ensure the community and participants are comfortable with this approach prior to conducting any research?</li> </ul>
<p><i>Build privacy, security and safety into the research design.</i></p>	<ul style="list-style-type: none"> <li>• Is the data to be collected culturally and contextually relevant, appropriate and meaningful? Have research questions been vetted and adapted appropriately, if needed by local researchers who know the context and culture?</li> <li>• Have we ensured that the burden for girls of participating in the research is not excessive in relation to the purpose of the data gathering exercise?</li> <li>• Have we set up the research as opt-in, have girls been clearly informed, and do they feel at ease about choosing to opt out before or at any time during the process?</li> </ul>

- Have we arranged for data to be collected or provided in a private and secure environment, where girls can speak freely? Have we informed interviewers/enumerators that sensitive information will be collected so that they have time to prepare safe spaces for interviews to take place?
- Have we minimized the need for collection of personal information, only that which is necessary for the purposes of the research or MEL?
- Have we ensured anonymization of the data collected as early in the process as possible?
- Have we ensured that personally identifiable information is separated from other data and kept protected?
- Have strict measures been taken to ensure the privacy and security of any devices, networks, servers, and other tools by which data is collected or stored? For example:
  - Are phones password protected and auto-locked?
  - Is the research or data gathering application also password protected and auto-locked? Are devices encrypted to 128 level at a minimum?
  - Is a remote wiping option available?
  - Have we provided devices for data gathering rather than asking girls/enumerators to use their own, and provided sufficient training on the use and security of the devices?
  - Will data be secured via a password-protected wi-fi, an official organization address, or another encrypted channel?
  - Have we categorized data into different levels of risk?
    - **High risk:** sensitive and private/confidential data that requires privacy and security protections, where data confidentiality is required by law, policy or contractual obligations, where special authorization is required for use and collection, any personally identifiable information or data, including written, audio/verbal, visual data such as recordings, videos and photos.
    - **Medium risk:** non-confidential internal data that should not be shared publicly, where unauthorized disclosure could cause material loss to the organization or brand risk, including aggregated data.
    - **Low risk:** public data that is not private or confidential, and which does not invite any risk to participants and whose publication would cause no adverse effects.
  - Is access to high-risk data limited to only staff with special permissions, who have been trained on privacy and security? Have other levels of access to data been determined/set for other staff and partners?
  - Has 3-step force authentication been established?
  - For extremely sensitive data, has test hacking into the database been attempted?
  - Have we put into place processes to ensure that data is backed up to mitigate any accidental loss, damage or destruction? Are regular back-ups factored into the data lifecycle? Is data stored in two separate places?
  - Is all data stored both password protected and encrypted throughout the data lifecycle, from collection through to storage and analysis to disposal?
  - Have we avoided storing data on girls' phones, USBs or Flash Drives in contexts where these could be stolen or seized by authorities?
  - Has remote wipe been enabled?
  - Have we trained data collectors to disable wi-fi, cellular data signals and GPS during the data collection process unless specified in the data

	<p>collection protocol (and after proper risk analysis and mitigation processes have been conducted)?</p> <ul style="list-style-type: none"> <li>• Has the possibility of making the phone SIM-free been considered?</li> <li>• Have we set a timeline for data retention/data disposal?</li> </ul> <ul style="list-style-type: none"> <li>• Do we feel confident that the data collected is safe and secure and will create limited risk for girls and their families and communities? In cases where we feel unsure, have we conducted Threat Modeling to identify potential adversaries who may be interested in the data we are collecting and ward against them?</li> <li>• In cases where topics are extremely sensitive, have we analyzed and decided on the least risky form of digital data collection? (Eg., video may be higher risk than audio only, text may be higher risk than audio)</li> <li>• Have we eliminated or limited to the degree possible any questions related to areas that could put participants at great risk now or in the future, such as: religious affiliation, ethnicity, political affiliation, sexual orientation, sexual conduct, illness or disability that stigmatizes, or situations of violence, assault, conflict or other sensitive or taboo topics?</li> <li>• Do we feel confident that we are not compromising girls' safety?</li> <li>• Have we looked into measures to protect enumerators or others involved in the research process, especially in the case of sensitive topics or conflict zones?</li> <li>• Have enumerators been trained on data security and privacy and protection for themselves and for those they interview? Have we put in support measures for them, especially in conflict areas?</li> </ul>
<p><i>Be accountable and responsible.</i></p>	<ul style="list-style-type: none"> <li>• In the case of any type of data breach or crisis, do we have a basic plan in place to inform participants in the research and to offer them our support?</li> <li>• Have we created a mechanism that allows participants to alert a team member or manager to any danger for the interviewer or respondent (such as a panic button)?</li> <li>• Has the research or MEL plan been approved by an Internal Review Board and has this approval been documented?</li> <li>• Have we completed an overall risk assessment for the initiative to help us document our design and decision making processes and to indicate responsibility for different areas? (See Risk Matrix Format)</li> <li>• Have we informed girls where and how to lodge complaints about the use of their data and do we have procedures in place for receiving and responding to complaints?</li> <li>• Have we scheduled in a yearly review of our privacy and security practices, given how quickly the situation shifts and changes?</li> <li>• Have we conducted due diligence on any/all partners and documented our decision-making process regarding selection of partners?</li> <li>• Do we have mechanisms in place for destroying data upon conclusion of the research project or the project period?</li> </ul>

## Additional resources:

Ways to Practice Responsible Development Data (2014) Responsible Data Forum (multiple authors).

<https://responsibledata.io/ways-to-practise-responsible-development-data/>

Oxfam's Responsible Program Data Policy (2014) [https://www.oxfam.org/sites/www.oxfam.org/files/file\\_attachments/story/oxfam-responsible-program-data-policy-feb-2015-en\\_1.pdf](https://www.oxfam.org/sites/www.oxfam.org/files/file_attachments/story/oxfam-responsible-program-data-policy-feb-2015-en_1.pdf)

Tactical Technology Collective (2013) Security in a Box's Toolkit, chapter 9 on social networks <https://securityinabox.org/en/chapter-9> and Chapter 10 on mobile phone security <https://securityinabox.org/en/chapter-10>.

Brown, I., Wright, J., & Erdos, D. (2013). Ethical Privacy Guidelines for Mobile Connectivity Measurements. Retrieved from <http://www.oii.ox.ac.uk/research/projects/?id=107>

ESOMAR Passive data collection, observation and recording [https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR\\_Codes-and-Guidelines\\_Maintaining-Distinctions-MRDM.pdf](https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR_Codes-and-Guidelines_Maintaining-Distinctions-MRDM.pdf)

ESOMAR Interviewing children and young people [https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR\\_Codes-and-Guidelines\\_Interviewing-Children-and-Young-People.pdf](https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR_Codes-and-Guidelines_Interviewing-Children-and-Young-People.pdf)

ESOMAR Data Protection Checklist [https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR-Data-Protection-Checklist\\_January-2015.pdf](https://www.esomar.org/uploads/public/knowledge-and-standards/codes-and-guidelines/ESOMAR-Data-Protection-Checklist_January-2015.pdf)

[1] The definitions on this page are adapted from the 2012 GSMA. Mobile Privacy Principles: Document: Promoting a user-centric privacy framework for the mobile ecosystem. (2012) <http://www.gsma.com/publicpolicy/wp-content/uploads/2012/03/gsmaprivacyprinciples2012.pdf> and Privacy Design Guidelines for Mobile Application Development <http://www.gsma.com/publicpolicy/wpent/uploads/2012/03/gsmaprivacydesignguidelinesformobileapplicationdevelopmentv1.pdf>

# Sample Risk Matrix



Please find attached the Excel 'Sample Risk Matrix'

<https://docs.google.com/spreadsheets/d/1qsbegV4uTfXdQKD-YdlpaCYyOabyZiZXn5AaTjSmXSI/edit?pref=2&pli=1#gid=773614129>