RESPONSIBLE DATA FOR CHILDREN

22 QUESTIONS TO ASSESS RESPONSIBLE DATA FOR CHILDREN (RD4C)

An Audit Tool toward Making the RD4C Principles Actionable

Version 1 - 2021

The RD4C Principles were developed by the GovLab and UNICEF to guide responsible data handling toward saving children's lives, defending their rights, and helping them fulfill their potential from early childhood through adolescence. In order to put these principles (detailed below) into practice, practitioners need to translate them into responsible data handling practices. This tool seeks to provide a structured approach for designing such practices.

The below Audit Tool provides 22 questions to rapidly assess initiatives or systems that handle data for and about children against the <u>RD4C</u> <u>Principles</u> — structured according to the:

- Why: establishing purpose and rationale for the data system;
- What: establishing a better understanding of the data handled through the system;
- Who: mapping the stakeholders involved in the system's use, including data subjects;
- How: establishing the presence of operations, policies, and procedures; and
- When and where: mapping temporal and place-based considerations.

The RD4C Audit Tool was developed for use by individuals and teams leading the design, implementation, and administration of data systems handling data for and about children — including those working in public agencies, private businesses, and the humanitarian and development sector. The questions below are not arranged sequentially but should be considered as a package. Many of the questions listed need to be answered in parallel or with an understanding of questions listed later in the questionnaire. Users are encouraged to review the <u>RD4C</u> <u>Selected Readings</u> library for additional guidance and resources to support putting the RD4C Principles into action.

The RD4C Principles

Participatory

Engaging and informing individuals and groups affected by the use of data for and about children

Professionally Accountable

Operationalizing responsible data practices and principles by establishing institutional processes, roles, and responsibilities

People-Centric

Ensuring the needs and expectations of children, their caregivers, and their communities are prioritized by actors handling data for and about them

Prevention of Harms Across the Data Lifecycle

Establishing end-to-end data responsibility by assessing risks during the collecting, storing, preparing, sharing, analyzing, and using stages of the data life cycle

Proportional

Aligning the breadth of data collection and duration of data retention with the intended purpose

Protective of Children's Rights

Recognizing the distinct rights and requirements for helping children develop to their full potential

Purpose-Driven

Identifying and specifying why the data is needed and how the intended or potential benefits relate to improving children's lives

Responsible Data Objective / Audit Question	Current State of Play	Recommendations
Objective / Audit Question What are the questions that will be answered through the use of data? Has the purpose been clearly specified; and shared with the data subjects? <i>Related RD4C Principles:</i> • Purpose-Driven • Participatory	[Describe the current response to the question, if any]	 Articulate and enshrine the data system's stated objectives in the form of core questions that the system can help answer. These questions can provide a useful roadmap for purpose-driven data use and reuse. The types of questions data could help to answer include: 1. Situational Awareness — understanding trends and the geographic distribution of various phenomena; 2. Cause and Effect — understanding key drivers and consequences of an observed situation; 3. Prediction — assessing and forecasting future risks, needs, and opportunities; and 4. Impact Assessment — determining which, whether, and how various interventions affect certain conditions.
		The question(s) can be defined through a participatory process that engages intended beneficiaries and other key stakeholders. The question(s) can also be refined, complemented, or replaced as conditions and priorities shift.

How will the insights generated inform action that can improve children's lives? <i>Related RD4C Principles:</i> • People-Centric • Purpose-Driven	[Describe the current response to the question, if any]	 Develop a structured process for identifying and assessing the potential value of data handled through the system. Consider categories or values such as: 1. <i>Improving Governance</i> through greater transparency and accountability; 2. <i>Empowering Citizens</i>, especially children and their caregivers, to make more informed decisions and advocate for their best interests; 3. <i>Creating New Innovations</i>, including new applications or digital services that can help to achieve overarching objectives; and 4. <i>Solving Public Problems</i>, by improving how organizations identify opportunities for bolstering efforts to improve children's lives.
How will the impact of data use on children's lives and well-being be measured?	[Describe the current response to the question, if any]	Establish a set of key metrics and measurement strategies directly associated with the core questions that provide a clear purpose for data collection, handling and use.

Responsible Data Objective / Audit Question	Current State of Play	Recommendations
Is the collection and use of data relevant, limited, and adequate to what is directly necessary for achieving its specific, intended purposes?	[Describe the current response to the question, if any]	Consider hosting " <u>data assemblies</u> "—citizens assemblies focused on responsible data handling. These data assemblies can engage different mini-publics representing different communities or interests (e.g. data subjects and their caregivers; domain experts; advocates and civil society professionals; and national and subnational government representatives).
How is data access managed to ensure that information is "open as possible and closed as necessary"?	[Describe the current response to the question, if any]	Conduct a data sensitivity and risk/benefit analysis to determine what data (if any) could be shared responsibly with stakeholders working to advance children's rights to inform their decision-making. Consider providing external stakeholders with data intelligence in the form of pre-processed insights, trends, and statistics in lieu of more granular data.
How is the integrity and quality of data collected ensured?	[Describe the current response to the question, if any]	Establish a timeline and process for regular checks of data quality, especially errors that could negatively impact downstream analyses or introduce risk. To maintain data integrity, ensure that procedures are in place to establish an audit trail in the event of inappropriate access or use of data.

Is the data only stored and managed as long as necessary to deliver on the intended purposes and needs of children and then discarded in a through a structured process?	[Describe the current response to the question, if any]	Define protocols for discarding personal data after it can no longer provide value in advancing the system's core purposes. These protocols could involve retaining aggregated information to inform longitudinal analyses without retaining individual-level data in the system.
 Related RD4C Principles: Prevention of Harms Across the Data Lifecycle Professionally Accountable Proportional 		

Responsible Data Objective / Audit Question	Current State	Recommendations
Who are the implementation partners (e.g. external stakeholders) and how are they identified during the deployment and use of the system? <i>Related RD4C Principles:</i> Participatory Professionally Accountable	[Describe the current response to the question, if any]	Across the data lifecycle—but especially at the early stages of the implementation process— consider using the <u>Decision Provenance</u> <u>Mapping tool</u> to monitor decision-making processes that could impact responsible data handling and ensure that there are clear lines of responsibility and accountability within and across participating institutions.
How do internal and external users engaging with the system demonstrate that they possess the expertise necessary to handle the data responsibly (e.g. through credentials or documented experience in data protection and responsible data handling)?	[Describe the current response to the question, if any]	Establish global protocols and processes for removing users from the system when their access to user data is no longer necessary, appropriate, or proportional.

How does the project team ensure that users of the data system are aware of and referring to relevant institutional policies and guidance documents and that they provide training to users of the system across implementing partners?	[Describe the current response to the question, if any]	Make relevant, plain-language policies and documentation easily accessible to all users of the data system. Create processes to alert users to any new or revised guidance.
Related RD4C Principles: Professionally Accountable 		

How have data subjects (populations from whom data is collected or are otherwise affected by the data analysis) and other key stakeholders been engaged in the design of the system? In particular, have marginalized and vulnerable population segments been consulted in the design of the data system? Have other partners, donors, and key stakeholders been part of the development? What processes are in place to guard against bias?

Related RD4C Principles:

- People-Centric
- Participatory
- Prevention of Harms Across the Data Lifecycle

[Describe the current response to the question, if any]

Develop a constituency map outlining key stakeholders that could be impacted by the system or might have useful expertise and experience to share. Engage identified stakeholders (and those working to advance their interests) with a clear understanding of how input received will be put into practice. Consider using the <u>People-Led Innovation</u> methodology to guide and structure these engagements.

How have data subjects (populations from whom data is collected or are otherwise affected by the data analysis) and other key stakeholders been given the information they need to understand what they are part of and how their data will be used, stored, shared?	[Describe the current response to the question, if any]	Develop targeted, plain-language communications strategies to inform relevant stakeholders about how the data system functions and toward what ends. Go beyond publishing a lengthy, opaque "Terms of Service" document by identifying in-person and digital channels through which stakeholders can be reached most effectively.
How are a system's operations and related policies and procedures aligned with the expectations of children, caregivers, and their communities? Related RD4C Principles: People-Centric Prevention of Harms Across the Data Lifecycle Professionally Accountable	[Describe the current response to the question, if any]	As discussed above, consider organizing data assemblies to better understand the expectations of children, caregivers, and their communities regarding data practices. These assemblies could ensure that activities are aligned with these expectations and establish a social license for data handling processes across the data life cycle.

How does the project team identify and monitor who is responsible and accountable for data-handling activities across the data lifecycle?	[Describe the current response to the question, if any]	Leverage the <u>Decision Provenance</u> <u>methodology</u> to monitor internal and external decision-making processes that could impact responsible data handling; and ensure this mapping is made accessible to all relevant parties.
Related RD4C Principles: Prevention of Harms Across the Data Lifecycle Professionally Accountable 		

Responsible Data Objective / Audit Question	Current State	Recommendations
 What procedures are in place for conducting an end-to-end risk assessment on how children' rights are upheld across the data lifecycle from collection to processing and analyzing to eventual use? Related RD4C Principles: Prevention of Harms Across the Data Lifecycle Protective of Children's Rights 	[Describe the current response to the question, if any]	Establish processes for contextual risk and mosaic effect assessments to determine whether risks to individuals or groups are likely to emerge. Establish a separate procedure or component of this assessment aimed at identifying risks of <i>not</i> using data handled through the system in a responsible manner. This assessment process would focus on identifying potential partners, beneficiaries, and use cases for data that do not create undue risks or new sensitivities. Importantly, any new opportunities established through this process could require additional consent from data subjects and caregivers.
 What procedures are in place to mitigate risks identified in the previous end-to-end risk assessment, recognizing children's distinct needs and requirements? Related RD4C Principles: Professionally Accountable Prevention of Harms Across the Data 	[Describe the current response to the question, if any]	Develop flexible strategies for users of the system to respond to risks and opportunities identified through end-to-end risk assessment recommended above. The <u>Data Responsibility</u> <u>Journey</u> mapping tool can be used as a basis for this work.

What types of policies and guidance documents are in place to guide the responsible use of the data system by internal and external parties across the data lifecycle? Related RD4C Principles: Prevention of Harms Across the Data	[Describe the current response to the question, if any]	Codify responsible data guidance and establish good practices in documentation that can be shared with all personnel that engage with the system. Assess the need for updates to this documentation on a regular basis and alert all relevant personnel to any changes.
What procedures are in place for responding to data-related disputes, unauthorized access or data breach, critical incident management, a data subject's request to delete their data, and other emergent challenges?	[Describe the current response to the question, if any]	Establish clear processes for personnel to respond to common data protection risks and critical incidents, with a focus on the risks most likely to occur based on the risk/benefit analysis. Ensure these procedures are well- recognized and understood by users through, for example, training sessions, webinars, or tabletop exercises.
Related RD4C Principles: Prevention of Harms Across the Data		Create a process for regular checks and assessments of parties with access to data

Responsible Data Objective / Audit Question	Current State	Recommendations
How does the project team determine which policy and legal frameworks at the local, national, regional, and global level must be taken into account (e.g. national and intergovernmental data protection laws and regulations such as GDPR, sector-specific regulations relating to, for example, health or education data)? Related RD4C Principles: Prevention of Harms Across the Data Lifecycle	[Describe the current response to the question, if any]	Establish procedures for proactively assessing potentially disruptive or limiting policy or regulatory frameworks early in the process of identifying future implementation areas.
Is the breadth of data collected and the length for which it is held proportional with the system's purpose?	[Describe the current response to the question, if any]	Regularly and proactively assess whether data collected and retained is advancing the system's core purpose. Update policies and procedures as warranted to ensure that only data absolutely necessary for achieving the system's goals is collected and retained. Delete or destroy data deemed to be disproportionate to the system's purpose.

How does the project team ensure that data collection is timely and consistent enough to enable decision-making and address core questions?	[Describe the current response to the question, if any]	Determine the timeframe necessary to advance through the data lifecycle—from initial collection to processing and storage to sharing to analysis to eventual use. Assess whether collected data is likely to remain relevant and useful by the end of this process.
How does the project team monitor and oversee implementations of the system in different country environments?	[Describe the current response to the question, if any]	Outline lightweight responsible data handling practices in core documentation for users. Where applicable, provide partner organizations with standard operating procedures related to regular data responsibility assessments and request reports on the findings from those assessments.