DATA MANAGEMENT AND PROTECTION POLICY

Objective:

This Data Security Policy aims to reinforce Sambodhi's commitment towards protecting confidential, restrictive, or sensitive data. The policy outlines organizational systems as well as behaviours expected of employees when dealing with data and provides a classification of the types of data they should be concerned about, its storage and accessability.

Scope:

This policy applies to all employees and consultants of Sambodhi. Reference to the word 'employee' in this policy should be understood to include the above unless otherwise stated.

Introduction:

Sambodhi collects data using advanced technology, provides real-time and near real-time data, and integrates diverse data points into dashboards for use of its clients and partners. This aspect of our capacity is essential in the case of assignments, where the information collected is required to be processed and shared as feedback to project implementers and donors. Sambodhi collects field-level data using mini-laptops, tablets, PDAs, smartphones and GPS devices. By using technology to collect data, Sambodhi could reduce the time lag in data collection, cleaning, processing, analysis and sharing of findings. At the same time this helps us reduce errors in data collection and collation.

Field activities and data collection for various research studies are carried out by enumerators and supervisors with oversight and support from Sambodhi's in-house team of field executives, filed managers and researchers. The field team is, in turn, supported by an in-house logistics management team. Data collected for each project is uploaded on centralized and cloud-based secure servers daily/periodically and can be accessed by other researchers associated with the respective project who are authorized to access such data. Sambodhi has a robust data security system that ensures the safety and confidentiality of data collected electronically.

A qualified pool of skilled workforce manages the data processing centre/computing hub and quality control and data validation. Our data team is experienced and exceptionally well versed with data entry software like CS Pro, SurveyCTO, mWater, Survey Solutions, EPI Info, SQL and Fox Pro, etc. and data processing and analytics software such as MS Excel, SPSS, STATA, SAS and R+.

Survey Point, an in-house platform created by Sambodhi to aid the process of high-quality data collection with precision and efficiency provides data users with a friendly dashboard that helps understand and interpret data, making complex decision-making simpler. Survey Point reduces

the time and effort invested in data collection, which is critical in many projects such as in the case of concurrent monitoring programs, where data is required to be processed and shared as feedback to the implementer in a swift and time-bound manner. Tech-enabled data collection has also helped minimize errors, assuring clients high-quality and dependable results. Sambodhi also has robust data security systems that ensures the safety and confidentiality of data collected electronically.

Ethical Protocols:

Sambodhi employs a high level of ethical protocols used in social research, including but not limited to ensuring participant confidentiality, principles of no-harm, full disclosure of research methods and tools, etc. We procure external ethical review certification from Independent Review Boards (IRBs) before conducting any primary data collection exercise.

Some of the measures that are undertaken to address ethical concerns are listed below:

- Our teams are oriented to be aware and mindful of differences in the culture, local customs, religious beliefs and practices, personal interaction, gender roles, disability, age and ethnicity while conducting any study.
- Our teams are trained to be considerate about the time taken by the respondents to participate in any survey.
- Our research proptcols are designed to ensure that repsondents are informed and their consent is sought before participating in any survey.
- Our team are trained to select participants reasonably keeping in mind the aims of the evaluation/study, and not because of the availability and ease of inducting them into the study. To ensure fair representation and to to the expent plausible, we employ random methods for selecting sample.

It is ensured that all reposndents read a consent form and agree to it before administrating the study. Before administering the tools to children/minors, consent is taken from their parents/designated guardians/caregivers. We provide children and their parent(s), legal guardian(s), school authority or other relevant oversight authority with all necessary details to make an informed decision regarding their participation in any study/evaluation where children are the direct subject of the research, evaluation, and other work. In addition, informed consent is also obtained when the work includes obtaining any voice recordings, video or photographs of children.

We ensure the confidentiality of any information that is collected from the respondents. The scope and limits of confidentiality are conveyed to the respondents prior to the administration of the study.

Data Security Guideline:

Sambodhi follows a standard data security guideline as outlined below:

- The PI/team leader consults the IT manager on how to correctly configure laptops and other external devices for safe use in collecting and storing research data.
- All data collection and storage devices are protected with a strong password.
- All sensitive research information on portable devices is encrypted.
- Access to identifiable data is limited to members of the study team on a need-to-know basis.
- All data files are encrypted, and the identifiers are moved to a designated server as soon as possible.
- Portable devices are kept in a secure location when it is not in use.
- After completion of data collection, all data collected on portable devices is transferred to a designated servers as soon as possible and deleted from the devices.
- Use of Google Mail, Calendar services and other such apps/software is not permitted to collect, store, or transmit sensitive human subjects research data or any sensitive information.
- If research includes sensitive identifiable data, external consultants and vendors are required to sign a confidentiality agreement.
- Identifiers, data, and keys are placed in separate; password-protected/encrypted files and each file is stored in a different secure location.
- If the research design and procedure allow, the PI/Team Leader can delete or destroy identifiable information as soon as possible after collection.
- Data in any form are either archived for later use or destroyed as per client requirements.

  Usually, there are three scenarios followed for data destruction/deletion:

  - If the client requests data to be kept in the public domain until a specified time frame or perpetuity.
  - Data is destroyed after six months of the completion of the project after signed permission from the client.
  - Data is destroyed/deleted as pecified in the respective between Sambodhi and the client.