Ethical Data Guidelines

Scope and Purpose

The purpose of this guide lays out the key principles, processes and policies Solar Sister has put in place to ensure responsible and ethical data practices.

The scope of this guide is limited to the data Solar Sister collects from program beneficiaries (referred to as “respondents”). The principles outlined here apply to anyone employed or contracted with Solar Sister, including research partners.

Updated: October 2018
Socially Responsible Data Principles

Key Principles

1. **Entrepreneurs First**
   Solar Sister’s data policies prioritize the needs of entrepreneurs and ensure they are heard. Entrepreneurs and respondents will never be put at risk. Policies will ensure that entrepreneurs and all those who are collecting and providing data are treated with respect and dignity. Solar Sister is committed to acting in the best interest of respondents.

2. **An Informed Team**
   All Solar Sister staff are trained on data protection policies. Solar Sister will put in place channels that provide opportunities for team members to contribute feedback on data processes and policies. The language of policies should be easily understood and clear, avoiding jargon. Each staff member is empowered to be responsible for ethical data practices.

3. **Quality over Quantity**
   Solar Sister limits the amount of data collected from entrepreneurs, focusing on the quality of data collected over the quantity. This keeps M&E systems efficient, respects the limited time of entrepreneurs and reduces the burden on respondents. Less data = less risk to respondents.
Core Tenants of Socially Responsible Data Management

- Legal Compliance
- Data Integrity
- External Sharing and Publication
- Storage and Access
- Collection and Informed Consent
Legal Compliance

Solar Sister commits to complying with all legal regulations and frameworks regarding data privacy and protection in its countries of operation.

However, compliance with existing regulations is not enough. Solar Sister commits to enact all policies necessary to protect the privacy of its data and do no harm to those it is collecting data from. Solar Sister commits to basing policies on best practices. Where necessary, Solar Sister will seek legal advice and external expertise.
Data Integrity

Data will be collected, stored and analyzed in ways that ensure accuracy, consistency and the protection of privacy. This includes:

- Data when collected originally is tagged with identifiable characteristics including date of collection, last modified date, collector, and location of collection.
- Data that is shared with external parties is anonymized. Data is anonymized when shared internally as much as possible.
- Data should only be used for its specified use (agreed on by respondent).
- Data should be recorded legibly.
- Data will be recorded at the time given and will not be manipulated by data collectors.
- Data collectors are trained on data integrity practices, processes and principles.
- Source data will be preserved and accessible.
Collection and Informed Consent

Data will only be collected with informed consent. This means:

- Respondents will be made aware of why their data is being collected and how it will be used.
- Respondents will be made aware that they can choose to not give or withdraw consent at any point without consequence.
- Evidence must be recorded of respondent’s consent.
- Consent applies to all types of data being captured including media.
- Consent process will be explained in respondent’s local language.
- A grievance process for respondents exists for when policies are violated, and is communicated to respondents.
- Only those who are 18 years or older can give consent.
External Sharing and Publication

Solar Sister only shares data for purposes that further support our entrepreneurs and impact on the ground. Personal data is not shared with an external party unless specifically consented to by entrepreneurs and for the purposes of research. Data is never shared if it will put the respondent at risk. All data shared publicly removes personally identifiable markers. All grant contracts which require sharing data with donors necessitate a Non-Disclosure Agreement (or contractual equivalent) which sets forth data use and sharing policies clearly. Solar Sister’s data privacy policies are public information and are made easily accessible to all those interested.
Storage and Access

Solar Sister commits to protecting the data of respondents to the best of our ability. This includes:

- Storing all data in Salesforce which is password protected and requires 2-factor authentication.
- Providing limited access to data whenever possible in our team (team members only have access to information they need).
- Consistently updating Salesforce and reaching out to their team when challenges arise.
- Training all staff on how to use Salesforce properly, store data in ways that protect privacy, and on access principles.

- Right to be forgotten - respondents can request that all data collected from them is permanently deleted at anytime. Respondents are made aware of this and the process for requesting this.
- Right to data access - if respondents request to see all data on them used by Solar Sister, this request will be fulfilled within 72 hours in a way that is accessible to the respondent.
Additional Policies - Research Partnerships

The principles outlined here apply to any research partnerships Solar Sister engages with.

There are also additional guidelines Solar Sister puts in place for research partnerships which can be found in its Monitoring and Evaluation Guidelines Manual.