POPULATION COUNCIL KENYA

DATA PROTECTION AND SECURITY POLICY

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DEFINITION OF KEY TERMS

Data

Any piece of information that is systematically collected for reference or analysis. Within PC Kenya, this includes operations/personnel data and data generated from research activities.

Data Subject

An identified or identifiable natural person who is the subject of personal data.

Personal Data

Any information relating to an identified or identifiable individual.

Personally Identifiable Information (PII)

Any information that contains personal identifiers or enough specific information to allow inference of subject identities. PII may contain direct identifiers (e.g., name, national identification number, passport information, personal phone numbers or e-mail addresses) that can identify a person uniquely, or quasi-identifiers (e.g., ethnicity, geographical location) that can be combined with other quasi-identifiers (e.g., date of birth) to identify an individual.

Data Processing

Any operation or a set of operations which is performed on personal data or sets of data, whether or not by automated means, such as:

(a) collection, recording, organization, structuring;
(b) storage, adaptation or alteration;
(c) retrieval, consultation or use;
(d) disclosure by transmission, dissemination, or otherwise making available; or
(e) alignment or combination, restriction, erasure/deletion or destruction.

Data De-identification

Data de-identification refers to the process used to prevent someone's personal identity from being revealed from shared data. This involves removing any personally identifiable information (PIIs) which may include names, phone numbers, national identification card and/or passport numbers (if collected), landmarks details, school names and any other information that may reveal the identity of a data subject.

De-identified Data

Data that can be linked to an identifiable individual but not immediately – e.g., data that can be linked using a "key" of subject identification (ID) numbers, where the key is stored elsewhere.

Anonymized Data

Data that cannot be linked to an identifiable individual by any means.

Sensitive Data

Data that would be considered harmful or embarrassing to an individual if accessed by unauthorized individuals (e.g., medical or mental health records, sexual or criminal behavior).

Data Protection

A set of laws, regulations and best practices guiding the collection and use of personal data about individuals. Data protection encompasses personal data and includes requirements above and beyond the base requirements of information security.

Data Encryption

The process of converting data and files into a code which requires a password, personal identification number (PIN), or key to de-encrypt (e.g., using BitLocker).

Password

A code needed to access an operating system or file. Windows or other operating systems (OS) require passwords, but these do not encrypt the underlying data and do not provide adequate protection should a device be stolen.

Key

A designation that links personally identifiable data to other data used for analysis, for instance, subject-identification numbers used in a database that are also represented in a screening log with subject names. It is also a variable value applied to a string or block of text to encrypt or decrypt it.

Data Breach

A breach of security leading to accidental or unlawful destruction, loss, alteration, or unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed.

Data Sharing Agreement

A legal contract governing the sharing or transfer of personal data between PC Kenya and a third party. It sets out the related protections, rights, and obligations of both parties and delineates the specific purpose(s) for which the data may be used.

Informed Consent

Any manifestation of express, unequivocal, free, specific, and informed indication of the data subject's wishes by a statement or by a clear affirmative action, signifying agreement to the processing of personal data relating to the data subject.

Ethics Review

Process of obtaining approval from the relevant local and international institutional review boards (IRB) and local regulatory bodies in the conduct of research involving human subjects.

LIST OF ACRONYMS

AI	Artificial Intelligence
DMU	Data Management Unit
DPC	Data Protection Committee
DPIA	Data Protection Impact Assessment
DPO	Data Protection Officer
DSA	Data Sharing Agreement
GDPR	General Data Protection Regulation
GPS	Global Positioning System
HR	Human Resource
ID	Identification
IT	Information Technology
MDM	Mobile Device Management
ODK	Open Data Kit
PC	Population Council
PI	Principal Investigator
PII	Personally Identifiable Information
PIN	Personal Identification Number
RBAC	Role-based Access Control
SMT	Senior Management Team
SOP	Standard Operating Procedure
USB	Universal Serial Bus
VPN	Virtual Private Network

1.0 BACKGROUND

Population Council Kenya (PC Kenya or "the organization") is a locally registered non-governmental research organization committed to building an equitable and sustainable world that enhances the health and well-being of current and future generations. PC Kenya envisions an equitable and sustainable future for the health and well-being of all people in Kenya and the East Africa region.

PC Kenya is committed to upholding the confidentiality and privacy of human subjects involved in research or administrative data. Increasingly, funders and partners expect funded organizations to implement robust data security measures, particularly in light of new challenges and risks posed by emerging technologies. This Data Protection and Security Policy (the "Policy") encompasses a comprehensive data governance, management, and security framework for PC Kenya. It also details the mechanisms for policy monitoring and enforcement, as well as the roles and responsibilities of key stakeholders.

2.0 PURPOSE AND SCOPE OF THIS POLICY

2.1 PURPOSE OF THIS POLICY

This Policy outlines the key standard procedures that must be followed by the different person(s) handling data at different levels in PC Kenya office. It conforms to the Kenya Data Protection Act of 2019 ("the Act"), the Kenya Data Protection (General) Regulations of 2021 ("the Regulations"), and international data protection frameworks, including the European Union General Data Protection Regulation (GDPR), and PC-Kenya's affiliate, the Population Council, Inc. (PC Inc.) Research Data Security Policy. The object and purpose of this Policy are:

(a) to regulate the processing of personal data in the PC Kenya office.

(b) to protect the privacy of individuals who provide data (data subjects).

(c) to ensure that the processing of personal data of a data subject is guided by the highest standards of data protection principles.

(d) to provide rights and remedies to protect the personal data of data subjects.

2.2 SCOPE OF THIS POLICY

This Policy applies to all PC Kenya employees (including full-time staff and temporary hires), fellows, interns, contractors, vendors, and subaward recipients that are involved in handling of data within or on behalf of PC Kenya. Data includes operations data from Finance and Administration Department (Human Resources and Finance) that mostly handles personnel data as well as research data generated by different projects implemented by PC Kenya. This policy may be used together with other data-related

documents such as other standard operating procedures (SOPs) for different components of data collection, management, analysis or sharing.

3.0 DATA GOVERNANCE

This section of the Policy outlines the administrative systems and processes that shall be followed at PC Kenya to ensure secure and ethical processing of research and operations data.

3.1 DATA PROTECTION OFFICER (DPO)

Article 24 of the Kenya Data Protection Act of 2019 requires a data processor or controller to appoint a Data Protection Officer (DPO). The Data Manager at PC Kenya shall serve as the organization's DPO. The DPO shall ensure PC Kenya's compliance with the Kenya Data Protection Law (the Act and the Regulations). This shall include ensuring that the organization's registration with the Office of the Data Protection Commissioner (ODPC) is up to date and that the DPO's contacts are communicated to ODPC as required by the Act. The detailed roles and responsibilities of the DPO are outlined in Section 7 of this Policy on "Roles and Responsibilities".

3.2 DATA PROTECTION COMMITTEE (DPC)

The Data Protection Committee (DPC or "the Committee") at PC Kenya shall comprise a minimum of four individuals and shall include representatives from the Data Management Unit (DMU), Information Technology (IT), Finance, and Human Resource (HR). The Committee shall be responsible for providing oversight on collection, processing, and storage of research and operations data within PC Kenya. The Committee shall further prepare an organizational-wide annual data protection and privacy report that highlights key issues around data protection and security in the organization. The report shall be presented to the Executive Director who shall use it to appraise the PC Kenya Board on matters relating to data protection and security. The detailed roles and responsibilities of the Committee are outlined in Section 7 of this Policy on "Roles and Responsibilities".

3.3 DATA CATEGORIZATION

PC Kenya data shall be categorized in terms of the level of sensitivity and the potential severity of harm to data subjects resulting from disclosure. Levels of sensitivity shall range from Level 0 (L0 - not sensitive) to Level 3 (L3 - highly sensitive) as defined in Table 1. L0 data do not contain personally identifiable information (PII) while L1-3 data contain such information (see Appendix A1 for examples of PII). All PC Kenya employees (including full-time staff and temporary hires), fellows, interns, contractors, vendors, and subaward recipients handling research or operations data on behalf of the organization shall assess the level of sensitivity of such data and the potential severity of impact of disclosure on data subjects based on the criteria outlined in Table 1 in this Policy before processing the data. The employee, fellow, intern, contractor, vendor, or subaward recipient shall discuss

with the Data Protection Committee the results of the assessment. The Committee shall make a determination of the circumstances under which the data can be processed in a manner that safeguards the data and the data subjects.

Level of sensitivity	Definition	Examples	Severity of harm
Level 0 (L0) (Not sensitive)	Data that contains neither personal identifiers nor enough specific information to allow inference of subject identities	Anonymized or aggregated data; pseudonymized data that does not contain enough information to allow inference of subject identities	Low
Level 1 (L1) (Moderately sensitive)	Data that contains personal identifiers or enough specific information to allow inference of subject identities; Accidental disclosure is unlikely to result in harm to data subjects or harm that is not greater than that associated with daily life	Data from a survey about reading habits; data from an experiment on pattern recognition	Medium
Level 2 (L2) (Sensitive)	Data that contains personal identifiers or enough specific information to allow inference of subject identities; Accidental disclosure can present a risk of civil liability, moderate psychological harm, financial harm, or material social harm that is greater than those associated with daily life	Data on employment history or personal relationships; data on sexual behavior that would not cause significant harm if exposed	High
Level 3 (L3) (Highly sensitive)	Data that contains personal identifiers or enough specific information to allow inference of subject identities; Accidental disclosure may cause significant harm to data subjects if exposed (e.g., serious risk of criminal liability, serious psychological harm, significant injury, loss of employability, financial harm, or significant social harm)	Data for which accidental disclosure could trigger criminal liability or risk serious physical harm (e.g., data on sexual behavior, illegal drug use, criminal behavior, crime victimization, or data from medical or mental health records)	Very high

3.4 DATA PROTECTION IMPACT ASSESSMENT (DPIA)

In compliance with Part VIII, Section 49(2) of the Kenya Data Protection (General) Regulations of 2021, a Data Protection Impact Assessment (DPIA) shall be conducted before any new research or operations data collection or processing activities within PC Kenya using the DPIA form (Appendix A2). The DPIA form shall be completed by Principal

Investigators (PIs) of research projects or PC Kenya employees, fellows, interns, contractors, vendors, or subaward recipients handling operations data before initiating new research or data processing activities. The completed form shall be submitted to the Data Protection Committee. The Committee shall make a determination of the actions the PI, employee, fellow, intern, contractor, vendor, or subaward recipient shall take to ensure secure and ethical collection or processing the data. PC Kenya shall also engage the services of external vendors with relevant expertise to conduct organizational-wide DPIA and systems audit once every two years. Based on the review, the vendors shall make recommendations regarding strengthening data protection and security within PC Kenya.

3.5 DATA SHARING

For the purposes of this Policy, data sharing involves making data available to other users or organizations while still retaining ownership. All data shared externally or internally shall have no personally identifiable information (PII). All data must be de-identified before sharing. De-identified research data must be approved by the project lead while operations data must be approved by the Finance and Administration Manager before it is shared externally. This process shall be undertaken for all research after completion of data collection. The PIIs shall also be removed from research data that are shared for analysis, whether analysis is conducted internally or externally. Where PIIs are required to be shared, express approval must be obtained from the data subjects and project Principal Investigator (PI) with written proof that justifies the need for such information. Such data must be shared using secure means and ONLY with the relevant persons authorized to access such data. At NO time shall any research or operations data be shared on social media. Where required that data is posted in public repositories, the data shall be completely anonymized.

For multi-partner projects, a Data Sharing Agreement (DSA) shall be developed outlining the purpose of data sharing, the categories of data involved, and the roles and responsibilities of each party in processing the data. Data may only be shared with third parties under a Data Sharing Agreement (DSA) provided or approved by the authorized individuals.

3.6 DATA TRANSFER

For the purposes of this Policy, data transfer involves change of ownership and may occur when PC Kenya is required to: (i) submit research data to project implementing partners (or vice versa – sub-award recipients are required to submit data to PC Kenya) or funders as part of contractual obligations; (ii) move research data from one country to another; or (iii) submit organizational data to legal entities in Kenya (e.g., court or the government). Transfer of data from PC Kenya to an implementing partner (or vice versa) shall be guided by contractual or data transfer agreements between the parties. Where such agreements are in contravention of the respective countries' laws on data transfer, the laws of those countries shall prevail. Transfer of data between countries shall be guided by applicable laws of the countries where data is collected. Transfer of data from PC Kenya to legal

entities in Kenya shall require written communication duly signed by a competent officer of the judicial system, such as a magistrate or judge. In all cases, PC Kenya employee, fellow, intern, contractor, vendor, or subaward recipient responsible for overseeing the transfer of data shall work with the Data Protection Committee to ensure proper anonymization, encryption or access control based on the levels of sensitivity defined in Table 1 before transferring the data.

3.7 ETHICS IN PROCESSING OF DATA

3.7.1 ETHICS REVIEW PROCESS

Unless otherwise stated with justifiable reasons, especially if the research involves collecting information from human subjects, the project Principal Investigator shall obtain approval from relevant ethical review boards and regulatory bodies before conducting research. The application process for approval by the ethical review or regulatory boards shall follow the procedures set out by the relevant ethical review or regulatory boards.

3.7.2 INFORMED CONSENT PROCESS

Informed consent (written or verbal) must be obtained from all data subjects before collecting data. The age of consent for participating in research in Kenya is 18 years. However, research subjects under 18 years who have assumed adult responsibilities such as household headship, marriage, or procreation are considered emancipated minors and can grant individual consent provided they are given sufficient information regarding their participation in research. For research subjects below 18 years of age (minors), informed consent shall be obtained from the parents, guardians or responsible caregiver first before obtaining assent from the research subjects. PC Kenya shall use informed consent or parental consent and assent form templates developed by the PC Inc. Institutional Review Board (IRB) (Appendices A3-A8). Data subjects must be informed about the following broad topics:

- the aim of the research and methods to be used;
- institutional affiliations of the research;
- anticipated benefits and potential risks and follow-up of the study;
- duration of the study;
- compensation, if any;
- discomfort participation in the research may entail;
- right to abstain from participating in the research or to withdraw from it at any time without reprisal;
- contact information of the investigators and national authorities; and
- measures to ensure the confidentiality of information provided (and potential to share their de-identified/anonymized data for future research where applicable).

3.7.3 NOTIFICATION OF DATA SUBJECTS WHEN DATA IS COLLECTED INDIRECTLY

Where PC Kenya collects personal data about a data subject indirectly (i.e., from a source other than the data subject), the employee, fellow, intern, contractor, vendor, or subaward recipient collecting the data shall ensure that the data subject is notified of such collection within fourteen (14) days of the data being collected (in accordance with Part II, Section 3 of the Kenya Data Protection (General) Regulations). The notification process ensures that data subjects are aware that their personal data has been collected, understand how it will be used, and are informed of their rights. The notification shall be provided through appropriate channels, depending on the available contact information for the data subject, and may include email, text message, phone call, or written communication. The notification shall contain key pieces of information to ensure the data subject is fully informed of the data collection and their rights, including:

- The identity of the organization collecting the data (PC Kenya), its name and contact details, and its role as a data controller or processor responsible for processing the personal data.
- The purposes for which the data is being collected and processed, the categories of personal data that have been collected indirectly, whether the personal data may be shared with third parties, and if so, the categories of those third parties and the purposes of such sharing.
- A clear explanation of the data subject's rights, including the right to access their data, the right to request that their data be corrected or deleted, the right to object to the processing of their data, and the procedure that the data subject must follow in order to exercise these rights.
- How long the data will be retained, and the contact details of a designated person or department within the organization that they can contact for any inquiries or concerns they may have regarding their personal data.

3.7.4 ETHICS TRAINING CERTIFICATION

In accordance with requirements of ethical review boards in Kenya and PC Inc. policy, all study investigators and data collection teams involved in PC Kenya research projects shall undertake an online ethics training course conducted by a recognized institution, e.g., through the CITI PROGRAM, before conducting research. Study investigators and data collection teams MUST provide a valid ethics training certificate that is no more than three years old before being deployed to oversee, supervise or collect data.

4.0 DATA MANAGEMENT

This section of the Policy outlines the processes for capturing, storing and processing research and operations data at PC Kenya.

4.1 DATA CAPTURE

Electronic data shall be collected using only PC Kenya devices unless otherwise stated in this Policy. All research data collection devices shall be issued to Research Assistants upon signing of agreement forms for the care of equipment and witnessed by PC Kenya authorized staff. By signing the forms, the Research Assistants agree to protect the devices from harmful substances such as fluids or high temperatures. They also agree to make sure the devices are used only for the study purposes and must be returned at the end of the study before they receive their final payments for the work done. They also agree that all data in the devices are kept secure from unauthorized access. All mobile and any handheld devices used for data collection must be returned to PC Kenya immediately and not more than 5 days after data collection is completed. In special circumstances, which must be approved by the Principal Investigators (PIs) or their designates, Research Assistants may be allowed to use their personal devices to collect data that may not have sensitive information. Whether information is sensitive or not must be approved by the study PI or their designates based on the criteria outlined in Section 3.3 of this Policy. In such situations, the data saved in the personal devices MUST be deleted from the devices within 5 days of completion of data collection and upon confirmation by the PC Kenya Data Manager that all data have been submitted and have no obvious errors. The contracted Research Assistants shall be responsible for such deletion, even if the device was borrowed.

Any operations data collected through the Finance and Administration department for organizational processes shall be collected through PC-Kenya official forms and electronically via secure official emails. The emails shall be accessed only through official computers assigned to staff by the IT department which have endpoint and email security to guarantee data security.

4.2 DATA TRANSMISSION

Data transmission is the process of sending and receiving paper-based or electronic data from one device or system to another over a communication medium, such as wired (e.g., Ethernet, fiber optics) or wireless (e.g., Wi-Fi cellular) networks. All sensitive data from Level 1 to Level 3 shall be transmitted from any device, either external data collection or storage device like a tablet, recorder, computer or a smart phone only through secure channels approved by PC Kenya IT and Data Management Unit. Before and after the transmission, users shall scan the data for any virus or malware before transmitting to any of the PC Kenya-approved cloud-based platforms or devices. In accordance with the PC Kenya policy on Data Retention (see Section 4.5.1 of this Policy), any data captured on

paper (such as consent forms) shall be kept in locked cabinets in PC Kenya office or in the approved warehouse and destroyed after seven years following the end of the project.

For all qualitative data collected on audio or video recorders, the data shall be uploaded on to PC Kenya SharePoint managed by the Data Management Unit and accessed only by the authorized study team members. The data must not be erased from the audio or video recorders in the field. The audios and videos shall not be uploaded on to individual Research Assistants' computers or other mobile devices except for the instance where the Research Assistant has been contracted to transcribe the data (see Section 4.3 of this Policy on "Data Transcription"). Upon completion of data collection, the audio and video recorders must be returned to the Data Management Unit within 5 days.

4.3 DATA TRANSCRIPTION

Data transcription involves converting information from one format to another, for example, from paper-based to electronic format or from audio or video recordings to electronic format. Data transcription shall only be conducted using software or media approved by PC Kenya. Transcription of audio- or video-recorded data shall ONLY be conducted by PC Kenya contracted Research Assistants or Project Team. Research Assistants may be allowed to use their personal devices to transcribe data that may not have sensitive information. In such situations, the data saved in the personal devices MUST be deleted from the devices within 5 days of completion of data transcription and upon confirmation by the PC Kenya Data Manager that all data have been submitted and have no obvious errors. The contracted Research Assistants shall be responsible for such deletion, even if the device was borrowed.

Transmission of audio or video data shall follow the process outlined under the section on Data Transmission (Section 4.2 of this Policy). All transcripts shall be submitted to the relevant project team members approved by the Principal Investigator to receive such data. Data must be submitted via secure means recommended by PC Kenya IT and the Data Management Unit.

4.4 DATA STORAGE

Physical documents that contain PII data shall be kept under lock and key in the PC Kenya premises and the key shall be under the custody of the Principal Investigator for research data documents, and the Finance and Administration department for operations data documents. The documents shall be securely stored in the PC Kenya premises until the time they are transported to the authorized warehouse. All the physical documents moved from the PC Kenya premises to the warehouse and/or vice versa shall be clearly recorded on a data retention/transmission form. A copy of this form shall be shared with the Data Protection Committee for organization documents, or with the Data Protection Committee, the Principal Investigator and thematic area lead for research documents. Electronic data shall be securely stored only on approved cloud-based platforms (e.g., Microsoft365, ODK

Central server) and secure access management implemented to ensure that the data is only accessed by authorized users or applications.

4.5 DATA RETENTION AND DELETION

PC Kenya recognizes the importance of managing data throughout its entire lifecycle, from initial collection to eventual deletion. This part of the Policy establishes the procedures for both retention and deletion of data in accordance with applicable national laws and regulations in order to optimize the use of storage resources, and mitigate the risks associated with retaining data that is no longer necessary.

4.5.1 DATA RETENTION

Specific retention periods are outlined for different categories of data depending on data format and the levels of sensitivity outlined in Section 3.3. of this Policy. There is no specific retention period for Level 0 electronic data. Level 1 to Level 3 electronic data shall generally be retained for a maximum of seven years from the end of the project or when it is no longer actively used for business purposes, unless project-specific or legal requirements stipulate otherwise. Physical records (all levels of sensitivity) shall be retained for a maximum of five years from the end of the project or when they are no longer actively used for business purposes, unless project-specific or legal requirements stipulate otherwise. Audio or video recordings shall be retained until after transcription and confirmation of data accuracy are completed, unless a different retention period is specified in this Policy or project-specific or legal requirements stipulate otherwise.

4.5.2 DATA DELETION

When data reaches the end of its designated retention period, PC Kenya shall employ secure deletion methods to prevent any possibility of data recovery or unauthorized access. Every step of the deletion process shall be documented to maintain accountability and ensure compliance with applicable data protection laws. The documentation shall include the date of deletion, a precise description of the data records, files, or media that were deleted, the name and title of the personnel overseeing the deletion, and documented approval for the deletion, including references to the relevant data retention schedule. The documentation shall also detail the specific method used for data deletion, such as secure data wiping for electronic data, physical shredding for paper documents, or degaussing for magnetic media. PC Kenya shall maintain evidence of successful deletion, which may include photographs or video recordings of physical destruction, deletion logs from data wiping tools, or signed attestations of deletion.

PC Kenya IT shall maintain a signed data deletion form, records of any communication related to the data deletion process, and a centralized log of all data deletion activities, including system configurations for electronic data deletion. Designated administrative

personnel shall be responsible for overseeing the destruction of physical records when due and maintaining the required documentation.

5.0 DATA SAFETY AND SECURITY

This section of the Policy outlines the procedures for protecting PC Kenya research and operations data from unauthorized access or accidental or intentional loss or damage.

5.1 DATA ACCESS

All data stored in the PC Kenya cloud-based servers shall be secured by strong passwords, encrypted, with firewall security and restricted access to only the data management team. User access rights configuration shall use role-based access control (RBAC) model while strong password configuration shall be set with strict specification – at least 10 characters long, difficult to guess, taking into account password history and complexity, and password lockout feature where a user shall be locked out of the system if incorrect password is entered 5 consecutive times. User account creation process on the active directory shall be a controlled process. Only authorized personnel shall submit account creation requests to IT through the employee tracker platform. The resources accessed by any account shall be determined by the group under which the account is allocated through RBAC model. Physical documents shall be securely stored under lock and key at the office and in a secure warehouse with only approved personnel authorized to visit and coordinate with the approved warehouse provider regarding storage and destruction of documents.

5.2 USE OF MOBILE AND END-USER DEVICES

PC Kenya recognizes the importance of safeguarding the confidentiality, integrity, and availability of data, especially when accessed through mobile devices such as tablets, phones or audio or video recorders. To secure the increasing number of mobile devices used within the organization to collect data, PC Kenya shall implement a Mobile Device Management (MDM) solution for both organization-owned and personal devices that includes measures such as device enrollment, strong passwords, and encryption. Mobile device users must adhere to security configurations and specific guidelines provided for organization-owned and personal mobile devices.

Prior to being used for handling PC Kenya data, all mobile devices MUST be approved and registered by the IT department using a formal process as outlined in the IT standard operating procedures (SOPs). Users are expected to access only necessary data, employ secure connections like VPNs, and avoid unsecured networks. The use of removable media, such as USB drives or memory cards on PC Kenya-owned mobile devices is strongly discouraged. Sensitive work-related data storage on personal devices is strongly discouraged, and when necessary, it must be done in encrypted containers. In the event

of a lost or stolen device, users are required to report it immediately to the IT department so that PC Kenya can take the necessary steps to protect the data.

5.3 USE OF NEW OR EMERGING TECHNOLOGIES

PC Kenya recognizes that the use and adoption of new or emerging technologies including Artificial intelligence (AI) in data processing have grown tremendously and will continue to evolve. The DPC shall conduct a data protection impact assessment (DPIA) to evaluate the risks of processing personal data using new or emerging technologies such as AI before the adoption of such technologies within PC Kenya.

5.4 SYSTEMS AUDIT AND VULNERABILITY ASSESSMENT

PC Kenya IT shall regularly audit the data systems to determine functionality, review access rights, and address vulnerabilities. PC-Kenya IT shall conduct regular vulnerability assessments and penetration tests and implement patch management to any vulnerabilities identified during these assessments. A systems audit shall also be conducted by external vendors every two years as part of the organization-wide data privacy impact assessment (DPIA) to identify any vulnerabilities that PC Kenya might be exposed to. The external vendors shall prepare a review report with recommendations and submit to PC Kenya IT for action.

5.5 DATA BREACH

Data breach may occur when any section of this Policy, or other governing Country laws on data protection, such as the Kenya Data Protection Act, is violated.

5.5.1 CONSEQUENCES OF DATA BREACH

Data breach may have the following adverse consequences for PC Kenya:

a) Legal liability:
   (i) A breach could result in legal action against PC Kenya that may result in fines being imposed on the organization or compensation for person(s) whose data is breached.
   (ii) Loss of data that may affect or leave data subjects prone to criminal activity or malicious use of their data.
b) Reputational risk: Severe impact on PC Kenya's reputation which may result in loss of trust and confidence from data subjects who may feel that their data is not secure, and loss of confidence from funders and partners.

In order to prevent adverse consequences of data breach, where necessary, any PC Kenya employee, fellow, intern, contractor, vendor, or subaward recipient who grossly commits a data breach as stated in this Policy and/or the Kenya Data Protection Act knowingly or unknowingly shall provide written communication to their direct supervisor(s) on what led

to such breach (see Section 5.5.2 of this Policy on "Reporting of Data Breach"). PC Kenya may constitute a committee to discuss the matter and upon finding that the person(s) is(are) liable, legal action for non-compliance with data protection measures may be pursued against the said person(s) in accordance with the Kenya Data Protection Act, Part VIII Section 58, and/or any other relevant law, or as stated in this Policy.

5.5.2 REPORTING OF DATA BREACH

Upon committing, suspecting or learning of a data breach by another person, the person committing the breach or the person who learns of the breach must report such breach in writing (via official email or official letter) within 72 hours to the PC Kenya Data Protection Committee, or as otherwise advised. Failure to do this shall constitute committing an offense punishable by law. The Data Protection Committee, in consultation with the PC Kenya Senior Management Team, shall then initiate a follow-up process on the case to establish the extent of the breach, and whether legal action needs to be pursued in accordance with procedures stated under Section 5.5.1 ("Consequences of a Data Breach").

5.6 DATA SUBJECTS' RIGHTS

PC Kenya recognizes the importance of upholding data subjects' rights when processing personal data as an integral component of data safety and security. PC Kenya employees, fellows, interns, contractors, vendors, or subaward recipients MUST uphold data subjects' rights to the following when processing personal data:

- Right to request confirmation whether their personal data is being processed, where and for what purpose;
- Right to request to be forgotten, which entails the removal of all the data related to the data subject;
- Right to withdraw consent for processing their data at any time without explaining why;
- Right to be notified of personal data breach which is likely to lead to adverse consequences for the data subject; and
- Right to make a complaint to PC Kenya, the ethics review board or any other appropriate supervisory authority that approved the processing of their data.

6.0 POLICY IMPLEMENTATION AND MONITORING

This section describes the processes and procedures for monitoring the implementation of this Policy within PC Kenya.

6.1 POLICY IMPLEMENTATION AND MONITORING OVERSIGHT

Implementation and monitoring of this Policy shall entail interpreting, assessing, and ensuring compliance with its requirements. The Senior Management Team (SMT) of PC Kenya shall be responsible for providing overall oversight for implementation and monitoring of this Policy. The Data Protection Committee (DPC) shall work closely with the SMT to monitor policy compliance and address any cases of violation through an appropriate incidence response plan which includes assessing the risk, notifying the affected individual and relevant authorities, and implementing proper measures to prevent future incidents. In cases of any policy violations, the concerned employee, fellow, intern, contractor, vendor, or subaward recipient must report such policy violation to the DPC. The DPC shall then conduct investigations to determine if the person is non-compliant. Any employee, fellow, intern, contractor, vendor, or subaward recipient who is determined to be non-compliant shall face appropriate penalties which may include, but are not limited to, denial of access to data, suspension of funding, loss of employment, or legal action.

6.2 TRAINING AND SENSITIZATION ABOUT THE POLICY

The PC Kenya IT department and the Data Management Unit shall provide training and sensitization to PC Kenya employees, at least once a year, on existing and/or emerging data protection and security policies and practices in order to foster constant awareness among employees about their roles and responsibilities in ensuring data protection and security. All research assistants involved in research projects shall, prior to being engaged in data collection or being granted access to any sensitive or confidential research data or systems, must undergo training specifically focused on data protection and security, the relevant legal and regulatory requirements (including the Kenya Data Protection Act), and PC Kenya's data protection and security policies and procedures. The training shall equip the research assistants with the necessary knowledge and skills to handle data responsibly and securely in order to minimize the risk of accidental or intentional data breaches. The minimum content requirements for training research assistants on data protection and security are outlined in Appendix A9 of this Policy.

6.3 UNDERSTANDING AND ADHERENCE TO THE POLICY

All PC Kenya employees, fellows, interns, contractors, vendors, or subaward recipients must acknowledge their understanding and readiness to adhere to this Policy by signing a physical or electronic form (Appendix A10) upon hiring/engagement and periodically thereafter (annually and/or upon updates) to ensure constant awareness about the organization's data protection and security guidelines. A signed acknowledgement form shall not be taken to be a contract of engagement between PC Kenya and the concerned

individual, but shall serve to confirm the individual's receipt, understanding, and agreement to the terms of this Policy, their commitment to all guidelines, and their acknowledgement of potential disciplinary and/or legal action for violation of the Policy. Signed acknowledgment forms shall be securely stored by the Human Resources department or the relevant department managing consultant engagements.

Additionally, all research assistants engaged in research projects must sign a legally binding data confidentiality agreement form (Appendix A11) before being engaged to collect or access data. Signed data confidentiality agreement forms shall serve as an acknowledgement by the research assistants of a clear understanding of their ethical and legal obligations concerning the protection of organizational or research data, and accountability and potential recourse in case of a breach. A clause on data protection and security shall be included in the research assistants' contracts that are binding during the duration of their engagement in a research project. The Principal Investigators shall take accountability measures against any research assistant who violates the Policy. Violation of the Policy may include committing a data breach, falsifying data or violating ethics requirements pertaining to the research. Accountability measures may include recommending performance improvement, further training, termination of contract for gross misconduct, or having the research assistant reimburse PC Kenya for losses.

6.4 POLICY REVIEW AND UPDATES

This policy shall be reviewed and updated periodically, at least after every three years, to ensure that it remains relevant to evolving technological and legal landscape pertaining to data protection and security in Kenya and/or globally.

7.0 ROLES AND RESPONSIBILITIES

This section of the Policy outlines in detail the roles and responsibilities of various entities within PC Kenya in ensuring compliance with the guidelines stipulated herein as well as applicable national laws, including the Kenya Data Protection Act and the Kenya Data Protection (General) Regulations.

7.1 DATA PROTECTION OFFICER (DPO)

- Provide advice on data processing requirements that are outlined in this Policy to PC Kenya employees, fellows, interns, contractors, vendors, or subaward recipients.
- Ensure that PC Kenya employees, fellows, interns, contractors, vendors, or subaward recipients comply with this Policy.
- Facilitate training and sensitization of PC Kenya employees, fellows, interns, contractors, vendors, or subaward recipients on data protection and security.
- Serve as the point of contact between PC Kenya and Office of the Data Protection Commissioner.
- Ensure that data processing activities conducted within PC Kenya are in compliance with this Policy and national laws.
- Represent the Data Management Unit in the Data Protection Committee.

7.2 DATA PROTECTION COMMITTEE (DPC)

- Review PC Kenya data protection and security policies, procedures, and guidelines.
- Assess and manage data protection and security risks within PC Kenya and potential impacts.
- Monitor compliance with PC Kenya and national data protection laws and regulations.
- Oversee handling of data protection and security incidents and data breaches.
- Provide guidance on data protection impact assessment.

7.3 INFORMATION TECHNOLOGY (IT)

- Facilitate training and sensitization of PC Kenya employees, fellows, interns, contractors, vendors, or subaward recipients on secure data storage and transfer.
- Maintain a list of approved software, hardware and services, including web-based services, for secure data collection, transmission, transcription, analysis and storage.
- Manage user access controls to different PC Kenya data platforms.

- Manage electronic data retention and deletion.
- Maintain Incident Response Plan for data breach.
- Represent the IT department in the Data Protection Committee.

7.4 HUMAN RESOURCES (HR)

- Onboard new PC Kenya employees, fellows, interns, contractors, vendors, or subaward recipients on this Policy.
- Represent HR department in the Data Protection Committee.

7.5 PRINCIPAL INVESTIGATOR (PI)

- Maintain a list of authorized members of the research team who can access personal data.
- Complete a data protection impact assessment form before the start of a new research project and remain accountable for the information and procedures outlined in the form.
- Ensure all members of the research team review and adhere to this Policy.
- Facilitate training of members of the research team on data protection and security.

7.6 FINANCE AND ADMINISTRATION MANAGER

- Approve destruction of non-electronic data.
- Ensure compliance with protection and security of finance and administration data.
- Nominate a representative of the Finance department to the Data Protection Committee.

7.7 STAFF AND CONTRACTORS

- Read, understand and adhere to this Policy.
- Participate in mandatory training and/or sensitization related to this Policy.
- Report any suspected or real incidents of data breach and/or cyber threats.

7.8 SENIOR MANAGEMENT TEAM (SMT)

- Review and approve the Policy.
- Provide oversight for the implementation and monitoring of the Policy.

APPENDICES

APPENDIX A1: EXAMPLES OF PERSONAL IDENTIFIERS

CATEGORY	EXAMPLES	
Names	• Name of person	
Numbers	• Phone numbers • Fax numbers • Electronic mail addresses • Social Security numbers • Medical record numbers • Health plan beneficiary numbers	• Account number • Certificate/license numbers • Vehicle license plates and serial numbers Device identifiers and serial numbers
Website/internet	• Web Universal Resource Locators (URLs) • Internet Protocol (IP) address numbers	• Journal entries or personal writings where descriptions can be linked back to an individual
Biometrics	• Fingerprints • Voice prints	• Full face photographic images
Location	• GPS coordinates • Street address	• Place of employment • Small geographic area
Other	• Any other unique identifying number, characteristic, or code (note this does not mean the unique code assigned by the investigator to code the data)	

APPENDIX A2: DATA PROTECTION IMPACT ASSESSMENT FORM

DATA PROTECTION IMPACT ASSESSMENT FORM

Instructions

1. Fill out this template prior to the commencement of any processing activity of personal data, or if you are making a significant change to an existing process.
2. Integrate the final outcomes into your project plan.

Part 1: Description of the processing operations

S/NO.	ASSESSMENT QUESTION	RESPONSE
1	Project title	
2	Project Outline: Explain broadly what the project aims to achieve and what type of processing it involves	
3	Who are the targeted data subjects? a. What are the classes of data to be collected; b. What is the class of data subjects to be involved (i.e., are there any vulnerable groups/ children that form part of the data subjects)	
4	Describe the Information Flow (i.e. the collection, use and deletion of personal data) here. It may be in a flow diagram or another format of explaining data flows a. Where you are getting the data from; b. How is the data being collected; c. How much data is likely to be collected; d. Where the data will be stored; e. How long will the data be stored; f. To what extent is the data being processed	

	g. Where data could be transferred to; and h. How many individuals are likely to be affected by the project.	
5	Describe how the data processing flow complies with the seven data protection principles- Lawfulness, fairness and transparency a. Purpose limitation b. Data minimization c. Accuracy d. Storage limitation e. Integrity and confidentiality f. Accountability	

Part 2: Assessment of necessity and proportionality of processing operations in relation to the purpose

S/NO.	ASSESSMENT QUESTION	RESPONSE	DPC -REMARKS *(to be filled in by DPC)*
	Describe compliance and proportionality, measures, in particular:		
1	What is your lawful basis for processing?		
2	How is consent to be obtained, if at all?		
3	Does the processing actually achieve your purpose?		
4	Is there another way to achieve the same outcome?		
5	How will you ensure data quality and data?		
6	What information will you give individuals?		
7	How will you help support their rights?		
8	What measures do you take to ensure compliance by the		

	Controller and Processor?		
9	What parties are involved in the processing and what are their specific roles?		
10	How do you safeguard the processing of personal data?		
11	How do you safeguard any international transfers?		

Part 3: Assessment of the risks to the rights and freedoms of data subjects

Risk-ID	Explain what practical steps you will take to ensure that you identify and address privacy risks.	Response	If yes, please, give explanation/examples…
1	Will the project involve the collection of new identifiable or potentially identifiable data about data subjects?	○ Yes ○ No	
2	Will the project compel data subjects to provide information about themselves, i.e., where they will have little awareness or choice?	○ Yes ○ No	
3	Will identifiable information about the data subjects be shared with other organizations or people who have not previously had routine access to the information?	○ Yes ○ No	
4	Are you using information about data subjects for a purpose it is not currently used for in a new way, i.e. using data collected to provide care for an evaluation of service development?	○ Yes ○ No	
5	Where information about data subjects is being used, would this be likely to raise privacy concerns or expectations, i.e. will it include health records, criminal records or other information that people may consider to be sensitive and private and may cause them concern or distress?	○ Yes ○ No	
6	Will the project require you to contact data subjects in ways which they may find intrusive, such as telephoning or emailing them without their prior consent?	○ Yes ○ No	

7	Will the project result in you making decisions in ways which can have a significant impact on data subjects, i.e. will it affect the services a person receives?	○ Yes ○ No	
8	Does the project involve you using new technology which might be perceived as being privacy intrusive, i.e. using biometrics, facial recognition, or automated decision making?	○ Yes ○ No	
9	Is a service being transferred to a new supplier (re-contracted) and the end of an existing contract?	○ Yes ○ No	
10	Is processing of identifiable / potentially identifiable data being moved to a new organization (but with same staff and processes)?	○ Yes ○ No	

Part 4: Measures envisaged to address the risks and the safeguards, security measures and mechanisms to ensure the protection of personal data and to demonstrate compliance with the Data Protection Laws *(to be filled in for ALL yes-responses in part 3)*

Risk Assessment - Identifying Privacy Risks and Evaluating Privacy Solutions								
Risk ID	Risk Description	Consequence	Risk Owner	(provide details of how you currently manage the risk)	Assessment of Risk			Risk Register Owner: XXXX
					Impact (1,2,3,4,5)	Likelihood (1,2,3,4,5)	Score	Describe what further actions you will take to reduce the Impact/ Likelihood and mitigate the risk. State who is the risk owner for each action

Part 5: Sign Off and Record Outcomes

(For Official use Only)

Risk-ID	Risk Score (impact x likelihood)	Residual high risk? Y/N	Risk Owner	Outcome *(approved/Rejected)*	DPC remarks

Summary of DPC advice *(to be provided by DPO):*

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.....

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Consultation with Office of the Data Protection Commissioner (if any)

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.....

.....

Assessed By (DPC)_____ Signature_____ Date_____

Reviewed By (ODPC-personnel) _____ Signature _____ Date_____

(ODPC, if/where applicable)

APPENDICES A3-A8: INFORMED CONSENT TEMPLATES

Appendix A3: Informed Consent Template for Adults 18 years or Older

You are invited to take part in a research study. Before you decide whether to participate, you need to understand why the research is being done and what it would involve. Please take the time to read or to listen as I read the following information. You may talk to others about the study if you wish. Please ask me if there is anything that is not clear, or if you would like more information. When all of your questions have been answered and you feel that you understand this study, you will be asked if you wish to participate in the study, and if yes to sign this Informed Consent form. You will be given a signed copy to keep.

Summary of Key Information Regarding the Study

<Enter summary information regarding the study that is a concise and focused presentation of the key information that is most likely to assist a prospective subject or legally authorized representative in understanding the reasons why one might or might not want to participate in the research. This part of the informed consent must be organized and presented in this way.>

<Key information elements for summary here:

- Consent is being sought for research
- Participation is voluntary
- The purposes of the research
- Expected duration of participation
- Procedures to be followed
- Reasonably foreseeable risks or discomforts
- Benefits to subjects or others>

Purpose of the Study and Study Requirements

What is the study? The purpose of the study is <add what your study is about> We are interested in learning <add more> .

<may add funding source here>

Why have I been invited to take part? You have been invited to take part because <you live in X area, participated in X activity, go to X school, etc.>

What will happen if I take part? If you agree to take part in the study, we will ask you to sign this form. You will also be asked to <enter description of what participant will be asked to do here> .

How long will <the interview/survey/intervention/etc.> last? This will take <entire time range> .

We may contact you again if <add reasons for follow up>

Risks

What are the risks of the study? You may experience <side effects, etc.>

BE SURE TO ADD:

> *A risk may be a breach of confidentiality (something you say is accidentally provided to others) but we will take precautions to see that this does not happen.*

CONSIDER ADDING IF APPROPRIATE:

> *An inconvenience may be the time and effort you take to be a participant. You may find one or more questions that we ask to be upsetting or emotionally sensitive. You do not have to respond to any question that makes you uncomfortable. You may end the interview at any time without penalty or loss of any benefits to which you are entitled.*

Benefits

What are the benefits of participating? <add benefits here> .

> *CONSIDER ADDING IF APPROPRIATE: There are no direct benefits to you for participating in the study. You may find an indirect benefit in knowing you have participated in an important study that could help others in the future.*

Confidentiality

Will my participation in the study be kept confidential? During the study, personally identifying information and study information that is collected will be kept confidential. No one will be told that you have participated in the study. Your name or other identifiers will not be included in reports from this study. This data will be stored in a <computer, locked location, etc> dedicated to the study that only the study team can access.

The study team will make every effort to protect your privacy and maintain the confidentiality of all the information that you provide.

How will you protect the information you collect about me, and how will that information be shared?

When your participation ends, results of this study may be used in publications and presentations. Your study data will be handled as confidentially as possible. If results of this study are published or presented, individual names and other personally identifiable information will not be used [if appropriate, add phrase such as "unless you give explicit permission for this below"].

To minimize the risks to confidentiality, we will… [Explain data security measures to be taken, e.g., storage, coding, encryption, limited access to study records, etc. If disclosure of faces or voices is necessary to understanding the research and therefore identifying information may be used in reports/presentations, explain this and provide "I agree" "I do not agree" options at the end of the consent form.]

With your permission we would like to share the data we collect from you because this data could be useful in future research studies by other researchers– if we share the data that we collect about you, we will remove any information that could identify you before we share it - (tweak this data sharing language as needed to fit your study – for example, if you might share data that potentially could be identifiable, such as GPS data that identifies locations of household structures, videotapes, then you should make that clear).

Voluntariness

What are my rights as a research participant/subject? Your participation in this study is completely voluntary. If you decide not to participate, you will not lose any existing benefits to which you are entitled. If you agree to participate in this study, you may end your participation at any time without penalty or loss of existing benefits to which you are entitled. If you decide to take part, you are free

to skip any questions. You are free to withdraw at any time without affecting your relationship with the<school, program, clinic, employer, etc.>

Additional Information

What will I receive for participating? <enter compensation if any> .

What will happen to the results of the research study? The results of the study will be discussed<presented at conferences, published in a journal, etc.>

Who has reviewed the study for ethical issues? This study has been reviewed by <enter reviewers (Population Council IRB, local IRB)>

What if I need more information? If you have a concern about any aspect of the study, you should ask to speak to the researchers who will do their best to answer your questions. You may call <enter name> at this number <enter contact number> .

What if there is a problem? Any complaint about the way you have been treated during the study or any possible harm you might suffer will be addressed. Please contact <enter name> at <enter phone number here> .

Subject Statement: I have read the Informed Consent for this study. I have received an explanation of the planned research, procedures, risks and benefits and privacy of my personal information. I agree to take part in this study. I understand that my participation in this study is voluntary.

Your name:_____

Your signature:_____**Date:**_____

Investigator or person who conducted Informed Consent discussion: I confirm that I have personally explained the nature and extent of the planned research, study procedures, potential risks and benefits, and confidentiality of personal information.

Name of person obtaining consent:_____**Signature of person obtaining consent:**_____**Date:**_____

Appendix A4: Informed Consent Template for Emancipated Minors (15-17 years)

You are invited to take part in a research study. Before you decide whether to participate, you need to understand why the research is being done and what it would involve. Please take the time to read or to listen as I read the following information. You may talk to others about the study if you wish. Please ask me if there is anything that is not clear, or if you would like more information. When all of your questions have been answered and you feel that you understand this study, you will be asked if you wish to participate in the study, and if yes to sign this Informed Consent form. You will be given a signed copy to keep.

Summary of Key Information Regarding the Study

<Enter summary information regarding the study that is a concise and focused presentation of the key information that is most likely to assist a prospective subject or legally authorized representative in understanding the reasons why one might or might not want to participate in the research. This part of the informed consent must be organized and presented in this way.>

<Key information elements for summary here:

- Consent is being sought for research
- Participation is voluntary
- The purposes of the research
- Expected duration of participation
- Procedures to be followed
- Reasonably foreseeable risks or discomforts
- Benefits to subjects or others>

Purpose of the Study and Study Requirements

What is the study? The purpose of the study is <add what your study is about> We are interested in learning <add more> .

<may add funding source here>

Why have I been invited to take part? You have been invited to take part because <you live in X area, participated in X activity, go to X school, etc.>

What will happen if I take part? If you agree to take part in the study, we will ask you to sign this form. You will also be asked to <enter description of what participant will be asked to do here> .

How long will <the interview/survey/intervention/etc.> last? This will take <entire time range> .

We may contact you again if <add reasons for follow up>

Risks

What are the risks of the study? You may experience <side effects, etc.>

CONSIDER ADDING IF APPROPRIATE:

> *An inconvenience may be the time and effort you take to be a participant. You may find one or more questions that we ask to be upsetting or emotionally sensitive. You do not have to respond to any question that makes you uncomfortable. You may end the interview at any time without penalty or loss of any benefits to which you are entitled.*

A risk may be a breach of confidentiality (something you say is accidentally provided to others) but we will take precautions to see that this does not happen.

Benefits

What are the benefits of participating? <add benefits here> .

CONSIDER ADDING IF APPROPRIATE: There are no direct benefits to you for participating in the study. You may find an indirect benefit in knowing you have participated in an important study that could help others in the future.

Confidentiality

Will my participation in the study be kept confidential? During the study, personally identifying information and study information that is collected will be kept confidential. No one will be told that you have participated in the study. Your name or other identifiers will not be included in reports from this study. This data will be stored in a <computer, locked location, etc> dedicated to the study that only the study team can access. We will not share any of your information with your parents.

The study team will make every effort to protect your privacy and maintain the confidentiality of all the information that you provide.

How will you protect the information you collect about me, and how will that information be shared?

When your participation ends, results of this study may be used in publications and presentations. Your study data will be handled as confidentially as possible. If results of this study are published or presented, individual names and other personally identifiable information will not be used [if appropriate, add phrase such as "unless you give explicit permission for this below"].

To minimize the risks to confidentiality, we will… [Explain data security measures to be taken, e.g., storage, coding, encryption, limited access to study records, etc. If disclosure of faces or voices is necessary to understanding the research and therefore identifying information may be used in reports/presentations, explain this and provide "I agree" "I do not agree" options at the end of the consent form.]

With your permission we would like to share the data we collect from you because this data could be useful in future research studies by other researchers– if we share the data that we collect about you, we will remove any information that could identify you before we share it - (tweak this data sharing language as needed to fit your study – for example, if you might share data that potentially could be identifiable, such as GPS data that identifies locations of household structures, videotapes, then you should make that clear).

Voluntariness

What are my rights as a research participant/subject? Your participation in this study is completely voluntary. If you decide not to participate, you will not lose any existing benefits to which you are entitled. If you agree to participate in this study, you may end your participation at any time without penalty or loss of existing benefits to which you are entitled. If you decide to take part, you are free to skip any questions. You are free to withdraw at any time without affecting your relationship with the <school, program, clinic, employer, etc.>

Additional Information

What will I receive for participating? <enter compensation if any> .

What will happen to the results of the research study? The results of the study will be discussed<presented at conferences, published in a journal, etc.>

Who has reviewed the study for ethical issues? This study has been reviewed by <enter reviewers (Population Council IRB, local IRB)>

What if I need more information? If you have a concern about any aspect of the study, you should ask to speak to the researchers who will do their best to answer your questions. You may call <enter name> at this number <enter contact number> .

What if there is a problem? Any complaint about the way you have been treated during the study or any possible harm you might suffer will be addressed. Please contact <enter name> at <enter phone number here> .

Subject Statement: I have read the Informed Consent for this study. I have received an explanation of the planned research, procedures, risks and benefits and privacy of my personal information. I agree to take part in this study. I understand that my participation in this study is voluntary.

Your name:_____

Your signature:_____**Date:**_____

Investigator or person who conducted Informed Consent discussion: I confirm that I have personally explained the nature and extent of the planned research, study procedures, potential risks and benefits, and confidentiality of personal information.

Name of person obtaining consent:_____

Signature of person obtaining consent:_____**Date:**_____

Appendix A5: Informed Consent Template for Parent/Guardian Permission (Parent/Guardian of a Minor)

Your child is invited to take part in a research study. Before you decide whether to allow your child to participate, you need to understand why the research is being done and what it would involve. Please take the time to read or to listen as I read the following information. You may talk to others about the study if you wish. Please ask me if there is anything that is not clear, or if you would like more information. When all of your questions have been answered and you feel that you understand this study, you will be asked if you would like your child to participate in the study, and if yes to sign this Informed Consent form. You will be given a signed copy to keep.

Your child will also be asked whether he/she wants to participate in this study.

Summary of Key Information Regarding the Study

<Enter summary information regarding the study that is a concise and focused presentation of the key information that is most likely to assist a prospective subject or legally authorized representative in understanding the reasons why one might or might not want to participate in the research. This part of the informed consent must be organized and presented in this way.>

<Key information elements for summary here:
- Consent is being sought for research
- Participation is voluntary
- The purposes of the research
- Expected duration of participation
- Procedures to be followed
- Reasonably foreseeable risks or discomforts
- Benefits to subjects or others>

Purpose of the Study and Study Requirements

What is the study? The purpose of the study is <add what your study is about> We are interested in learning <add more> .

<may add funding source here>

Why has my child been invited to take part? Your child has been invited to take part because <you live in X area, participated in X activity, go to X school, etc.>

What will happen if my child takes part? If you agree to let your child take part in the study, we will ask you to sign this form. Your child will be asked to <enter description of what participant will be asked to do here> .

How long will <the interview/survey/intervention/etc.> last? This will take <entire time range> .

We may contact you again if <add reasons for follow up>

Risks

What are the risks of the study? Your child may experience <side effects, etc.>

BE SURE TO ADD:

A risk may be a breach of confidentiality (something you say is accidentally provided to others) but we will take precautions to see that this does not happen.

CONSIDER ADDING IF APPROPRIATE:

An inconvenience may be the time and effort your child takes to be a participant. Your child may find one or more questions that we ask to be upsetting or emotionally sensitive. Your child does not have to respond to any question that makes him/her uncomfortable. Your child may end the interview at any time without penalty or loss of any benefits to which he/she is entitled.

Benefits

What are the benefits of participating? <add benefits here> .

CONSIDER ADDING IF APPROPRIATE: There are no direct benefits to you or your child for participating in the study. You may find an indirect benefit in knowing your child has participated in an important study that could help others in the future.

Confidentiality

Will my child's participation in the study be kept confidential? During the study, personally identifying information and study information that is collected will be kept confidential. No one will be told that your child has participated in the study. Your child's name or other identifiers will not be included in reports from this study. This data will be stored in a <computer, locked location, etc> dedicated to the study that only the study team can access. We will not share any of your information with your parents.

The study team will make every effort to protect your child's privacy and maintain the confidentiality of all the information that he/she provides.

How will you protect the information you collect about my child, and how will that information be shared?

When your child's participation ends, results of this study may be used in publications and presentations. Your child's study data will be handled as confidentially as possible. If results of this study are published or presented, individual names and other personally identifiable information will not be used [if appropriate, add phrase such as "unless you give explicit permission for this below"].

To minimize the risks to confidentiality, we will… [Explain data security measures to be taken, e.g., storage, coding, encryption, limited access to study records, etc. If disclosure of faces or voices is necessary to understanding the research and therefore identifying information may be used in reports/presentations, explain this and provide "I agree" "I do not agree" options at the end of the consent form.]

With your permission we would like to share the data we collect from your child because this data could be useful in future research studies by other researchers– if we share the data that we collect about you, we will remove any information that could identify you before we share it - (tweak this data sharing language as needed to fit your study – for example, if you might share data that potentially could be identifiable, such as GPS data that identifies locations of household structures, videotapes, then you should make that clear).

Voluntariness

What are my child's rights as a research participant/subject? Your child's participation in this study is completely voluntary. If your child decides not to participate, he/she will not lose any existing benefits to which he/she is entitled. If you agree to let your child participate in this study, you may end his/her participation at any time without penalty or loss of existing benefits to which he/she is entitled.

Additional Information

What will my child receive for participating? <enter compensation if any> .

What will happen to the results of the research study? The results of the study will be discussed<presented at conferences, published in a journal, etc.>

Who has reviewed the study for ethical issues? This study has been reviewed by <enter reviewers (Population Council IRB, local IRB)>

What if I need more information? If you have a concern about any aspect of the study, you should ask to speak to the researchers who will do their best to answer your questions. You may call <enter name> at this number <enter contact number> .

What if there is a problem? Any complaint about the way your child has been treated during the study or any possible harm your child might suffer will be addressed. Please contact <enter name> at <enter phone number here> .

Subject Statement: I have read the Informed Consent for this study. I have received an explanation of the planned research, procedures, risks and benefits and privacy of my personal information. I agree to allow my child to take part in this study. I understand that my child's participation in this study is voluntary.

Your name:_____

Your signature:_____**Date:**_____

Investigator or person who conducted Informed Consent discussion: I confirm that I have personally explained the nature and extent of the planned research, study procedures, potential risks and benefits, and confidentiality of personal information.

Name of person obtaining consent:_____

Signature of person obtaining consent:_____**Date:**_____

Appendix A6: Assent Template for Child Under 14 Years Old

You are invited to take part in a research study. Before you decide whether to participate, you need to understand why the research is being done and what it would involve. Please take the time to read or to listen as I read the following information. You may talk to others about the study if you wish. Please ask me if there is anything that is not clear, or if you would like more information.

Your parent or guardian has already given permission. However, you do not have to say yes. We have talked to your parent or guardian and he/she agrees that you do not have to say yes.

Summary of Key Information Regarding the Study

<Enter summary information regarding the study that is a concise and focused presentation of the key information that is most likely to assist a prospective subject or legally authorized representative in understanding the reasons why one might or might not want to participate in the research. This part of the informed consent must be organized and presented in this way.>

<Key information elements for summary here:

- Consent is being sought for research
- Participation is voluntary
- The purposes of the research
- Expected duration of participation
- Procedures to be followed
- Reasonably foreseeable risks or discomforts
- Benefits to subjects or others>

Purpose of the Study and Study Requirements

What is the study? The purpose of the study is <add what your study is about> We are interested in learning <add more> .

<may add funding source here>

Why have I been invited to take part? You have been invited to take part because <you live in X area, participated in X activity, go to X school, etc.>

What will happen if I take part? If you agree to take part in the study, we will ask you to sign this form. You will also be asked to <enter description of what participant will be asked to do here> .

How long will <the interview/survey/intervention/etc.> last? This will take <entire time range> .

We may contact you again if <add reasons for follow up>

Risks

What are the risks of the study? You may experience <side effects, etc.>

BE SURE TO ADD:

A risk may be a breach of confidentiality (something you say is accidentally provided to others) but we will take precautions to see that this does not happen.

CONSIDER ADDING IF APPROPRIATE:

An inconvenience may be the time and effort you take to be a participant. You may find one or more questions that we ask to be upsetting or emotionally sensitive. You do not have to

respond to any question that makes you uncomfortable. You may end the interview at any time without penalty or loss of any benefits to which you are entitled.

Benefits

What are the benefits of participating? <add benefits here> .

CONSIDER ADDING IF APPROPRIATE: There are no direct benefits to you for participating in the study. You may find an indirect benefit in knowing you have participated in an important study that could help others in the future.

Confidentiality

Will anyone know what I say or do? During the study, personally identifying information and study information that is collected will be kept confidential. No one will be told that you have participated in the study. Your name or other identifiers will not be included in reports from this study. This data will be stored in a <computer, locked location, etc> dedicated to the study that only the study team can access. We will not share any of your information with your parents.

The study team will make every effort to protect your privacy and maintain the confidentiality of all the information that you provide.

How will you protect the information you collect about me, and how will that information be shared?

When your participation ends, results of this study may be used in publications and presentations. Your study data will be handled as confidentially as possible. If results of this study are published or presented, individual names and other personally identifiable information will not be used [if appropriate, add phrase such as "unless you give explicit permission for this below"].

To minimize the risks to confidentiality, we will… [Explain data security measures to be taken, e.g., storage, coding, encryption, limited access to study records, etc. If disclosure of faces or voices is necessary to understanding the research and therefore identifying information may be used in reports/presentations, explain this and provide "I agree" "I do not agree" options at the end of the consent form.]

With your permission we would like to share the data we collect from you because this data could be useful in future research studies by other researchers– if we share the data that we collect about you, we will remove any information that could identify you before we share it - (tweak this data sharing language as needed to fit your study – for example, if you might share data that potentially could be identifiable, such as GPS data that identifies locations of household structures, videotapes, then you should make that clear).

The study team will make every effort to protect your privacy and maintain the confidentiality of your information.

Voluntariness

What are my rights as a research participant/subject? Your participation in this study is completely voluntary. If you do not want to participate that is ok. If you want to participate, you may stop at any time. You are free to skip any questions.

Subject Statement: I have read the Informed Consent for this study. I have received an explanation of the planned research, procedures, risks and benefits and privacy of my personal information. I agree to take part in this study. I understand that my participation in this study is voluntary.

Your name:_____

Your signature:_____**Date:**_____

Investigator or person who conducted Informed Consent discussion: I confirm that I have personally explained the nature and extent of the planned research, study procedures, potential risks and benefits, and confidentiality of personal information.

Name of person obtaining consent:_____

Signature of person obtaining consent:_____**Date:**_____

Appendix A7: Assent Template for adolescents 14-17 Years Old

You are invited to take part in a research study. Before you decide whether to participate, you need to understand why the research is being done and what it would involve. Please take the time to read or to listen as I read the following information. You may talk to others about the study if you wish. Please ask me if there is anything that is not clear, or if you would like more information. When all of your questions have been answered and you feel that you understand this study, you will be asked if you wish to participate in the study, and if yes to sign this Informed Consent form. You will be given a signed copy to keep.

Your parent or guardian has already given permission. However, you do not have to say yes. We have talked to your parent or guardian and he/she agrees that you do not have to say yes.

Summary of Key Information Regarding the Study

<Enter summary information regarding the study that is a concise and focused presentation of the key information that is most likely to assist a prospective subject or legally authorized representative in understanding the reasons why one might or might not want to participate in the research. This part of the informed consent must be organized and presented in this way.>

<Key information elements for summary here:

- Consent is being sought for research
- Participation is voluntary
- The purposes of the research
- Expected duration of participation
- Procedures to be followed
- Reasonably foreseeable risks or discomforts
- Benefits to subjects or others>

Purpose of the Study and Study Requirements

What is the study? The purpose of the study is <add what your study is about> We are interested in learning <add more> .

<may add funding source here>

Why have I been invited to take part? You have been invited to take part because <you live in X area, participated in X activity, go to X school, etc.>

What will happen if I take part? If you agree to take part in the study, we will ask you to sign this form. You will also be asked to <enter description of what participant will be asked to do here> .

How long will <the interview/survey/intervention/etc.> last? This will take <entire time range> .

We may contact you again if <add reasons for follow up>

Risks

What are the risks of the study? You may experience <side effects, etc.>

BE SURE TO ADD:

A risk may be a breach of confidentiality (something you say is accidentally provided to others) but we will take precautions to see that this does not happen.

CONSIDER ADDING IF APPROPRIATE:

An inconvenience may be the time and effort you take to be a participant. You may find one or more questions that we ask to be upsetting or emotionally sensitive. You do not have to respond to any question that makes you uncomfortable. You may end the interview at any time without penalty or loss of any benefits to which you are entitled.

Benefits

What are the benefits of participating? <add benefits here> .

CONSIDER ADDING IF APPROPRIATE: There are no direct benefits to you for participating in the study. You may find an indirect benefit in knowing you have participated in an important study that could help others in the future.

Confidentiality

Will my participation in the study be kept confidential? During the study, personally identifying information and study information that is collected will be kept confidential. No one will be told that you have participated in the study. Your name or other identifiers will not be included in reports from this study. This data will be stored in a <computer, locked location, etc> dedicated to the study that only the study team can access. We will not share any of your information with your parents.

The study team will make every effort to protect your privacy and maintain the confidentiality of all the information that you provide.

How will you protect the information you collect about me, and how will that information be shared?

When your participation ends, results of this study may be used in publications and presentations. Your study data will be handled as confidentially as possible. If results of this study are published or presented, individual names and other personally identifiable information will not be used [if appropriate, add phrase such as "unless you give explicit permission for this below"].

To minimize the risks to confidentiality, we will… [Explain data security measures to be taken, e.g., storage, coding, encryption, limited access to study records, etc. If disclosure of faces or voices is necessary to understanding the research and therefore identifying information may be used in reports/presentations, explain this and provide "I agree" "I do not agree" options at the end of the consent form.]

With your permission we would like to share the data we collect from you because this data could be useful in future research studies by other researchers– if we share the data that we collect about you, we will remove any information that could identify you before we share it - (tweak this data sharing language as needed to fit your study – for example, if you might share data that potentially could be identifiable, such as GPS data that identifies locations of household structures, videotapes, then you should make that clear).

Voluntariness

What are my rights as a research participant/subject? Your participation in this study is completely voluntary. If you decide not to participate, you will not lose any existing benefits to which you are entitled. If you agree to participate in this study, you may end your participation at any time without

penalty or loss of existing benefits to which you are entitled. If you decide to take part, you are free to skip any questions. You are free to withdraw at any time without affecting your relationship with the <school, program, clinic, employer, etc.>

Additional Information

What will I receive for participating? <enter compensation if any> .

What will happen to the results of the research study? The results of the study will be discussed<presented at conferences, published in a journal, etc.>

Who has reviewed the study for ethical issues? This study has been reviewed by <enter reviewers (Population Council IRB, local IRB)>

What if I need more information? If you have a concern about any aspect of the study, you should ask to speak to the researchers who will do their best to answer your questions. You may call <enter name> at this number <enter contact number> .

What if there is a problem? Any complaint about the way you have been treated during the study or any possible harm you might suffer will be addressed. Please contact <enter name> at <enter phone number here> .

Subject Statement: I have read the Informed Consent for this study. I have received an explanation of the planned research, procedures, risks and benefits and privacy of my personal information. I agree to take part in this study. I understand that my participation in this study is voluntary.

Your name: _____

Your signature: _____**Date:** _____

Investigator or person who conducted Informed Consent discussion: I confirm that I have personally explained the nature and extent of the planned research, study procedures, potential risks and benefits, and confidentiality of personal information.

Name of person obtaining consent: _____

Signature of person obtaining consent: _____**Date:**_____

Appendix A8: Assent Template for Focus Group Discussion Consent

You are invited to take part in a research study. Before you decide whether to participate, you need to understand why the research is being done and what it would involve. Please take the time to read or to listen as I read the following information. You may talk to others about the study if you wish. Please ask me if there is anything that is not clear, or if you would like more information. When all of your questions have been answered and you feel that you understand this study, you will be asked if you wish to participate in the study, and if yes to sign this Informed Consent form. You will be given a signed copy to keep.

Summary of Key Information Regarding the Study

<Enter summary information regarding the study that is a concise and focused presentation of the key information that is most likely to assist a prospective subject or legally authorized representative in understanding the reasons why one might or might not want to participate in the research. This part of the informed consent must be organized and presented in this way.>

<Key information elements for summary here:

- Consent is being sought for research
- Participation is voluntary
- The purposes of the research
- Expected duration of participation
- Procedures to be followed
- Reasonably foreseeable risks or discomforts
- Benefits to subjects or others>

Purpose of the Study and Study Requirements

What is the study? The purpose of the study is <add what your study is about> We are interested in learning <add more> .

<may add funding source here>

Why have I been invited to take part? You have been invited to take part because
<you live in X area, participated in X activity, go to X school, etc.>

What will happen if I take part? If you agree to take part in the study, we will ask you to sign this form. You will also be asked to <enter description of what participant will be asked to do here> .

How long will the focus group discussion last? This will take <entire time range> .

We may contact you again if <add reasons for follow up>

Risks

What are the risks of the study?

An inconvenience may be the time and effort you take to be a participant. You may find one or more questions that we ask to be upsetting or emotionally sensitive. You do not have to respond to any question that makes you uncomfortable. You may end the focus group at any time without penalty or loss of any benefits to which you are entitled.

A risk may be a breach of confidentiality (something you say during the focus group is shared with others outside the group) but we will take precautions to see that this does not happen.

Benefits

What are the benefits of participating? There are no direct benefits to you for participating in the study. You may find an indirect benefit in knowing you have participated in an important study that could help others in the future.

Confidentiality

Will my participation in the study be kept confidential?

During the study, personally identifying information and study information that is collected will be kept confidential. Other focus group participants will know what you say during the focus group discussion. However, we will ask participants to keep information shared during the focus group confidential. Your name or other identifiers will not be included in reports from this study. This data will be stored in a <computer, locked location, etc.> dedicated to the study that only the study team can access.

The study team will make every effort to protect your privacy and maintain the confidentiality of all the information that you provide.

How will you protect the information you collect about me, and how will that information be shared?

When your participation ends, results of this study may be used in publications and presentations. Your study data will be handled as confidentially as possible. If results of this study are published or presented, individual names and other personally identifiable information will not be used [if appropriate, add phrase such as "unless you give explicit permission for this below"].

To minimize the risks to confidentiality, we will… [Explain data security measures to be taken, e.g., storage, coding, encryption, limited access to study records, etc. If disclosure of faces or voices is necessary to understanding the research and therefore identifying information may be used in reports/presentations, explain this and provide “I agree” “I do not agree” options at the end of the consent form.]

With your permission we would like to share the data we collect from you because this data could be useful in future research studies by other researchers– if we share the data that we collect about you, we will remove any information that could identify you before we share it - (tweak this data sharing language as needed to fit your study – for example, if you might share data that potentially could be identifiable, such as GPS data that identifies locations of household structures, videotapes, then you should make that clear).

Voluntariness

What are my rights as a research participant/subject? Your participation in this study is completely voluntary. If you decide not to participate, you will not lose any existing benefits to which you are entitled. If you agree to participate in this study, you may end your participation at any time without penalty or loss of existing benefits to which you are entitled. If you decide to take part, you are free to refrain from answering any questions. You are free to withdraw at any time without affecting your relationship with the <school, program, clinic, employer, etc.>

Additional Information

What will I receive for participating? <enter compensation if any> .

What will happen to the results of the research study? The results of the study will be <presented at conferences, published in a journal, etc.>

Who has reviewed the study for ethical issues? This study has been reviewed by <enter reviewers (Population Council IRB, local IRB)>

What if I need more information? If you have a concern about any aspect of the study, you should ask to speak to the researchers who will do their best to answer your questions. You may call <enter name> at this number <enter contact number> .

What if there is a problem? Any complaint about the way you have been treated during the study or any possible harm you might suffer will be addressed. Please contact <enter name> at <enter phone number here> .

Subject Statement: I have read the Informed Consent for this study. I have received an explanation of the planned research, procedures, risks and benefits and privacy of my personal information. I agree to take part in this study. I understand that my participation in this study is voluntary.

Your name:_____

Your signature:_____**Date:**_____

Investigator or person who conducted Informed Consent discussion: I confirm that I have personally explained the nature and extent of the planned research, study procedures, potential risks and benefits, and confidentiality of personal information.

Name of person obtaining consent:_____

Signature of person obtaining consent:_____**Date:**_____

APPENDIX A9: RECOMMENDED CONTENT FOR TRAINING RESEARCH ASSISTANTS ON DATA PROTECTION AND SECURITY

MODULE	TOPIC	LEARNING OBJECTIVES
Module 1	Introduction to Data Protection and Security	• Understand the fundamental concepts of data protection and security • Recognize the importance of safeguarding personal and confidential information in research
Module 2	Overview of Relevant Data Protection Laws and Regulations	• Identify and understand the key principles and requirements of the Kenya Data Protection Act, including data subjects' rights and organizational obligations • Be aware of other relevant international or local data protection regulations that may apply to the research
Module 3	PC Kenya Data Protection and Security Policies and Procedures	• Understand PC Kenya's specific data protection and security policies, standards, and procedures relevant to research activities • Know where to find and access these policies and procedures
Module 4	Handling Sensitive and Confidential Research Data	• Learn to identify and classify sensitive and confidential research data according to organizational guidelines • Understand best practices for handling, using, and managing this type of data responsibly and securely throughout the research lifecycle
Module 5	Data Access and Usage Guidelines	• Understand the principles of least privilege and need-to-know when accessing research data • Know the authorized methods for accessing specific datasets and systems • Be aware of restrictions on data usage for personal or unauthorized purposes
Module 6	Secure Data Storage, Transfer, and Disposal	• Learn about PC Kenya's requirements for secure data storage, including encryption methods, access controls, and physical security measures • Understand the protocols for secure data transfer, both electronically and physically • Know the procedures for the secure disposal or destruction of research data in compliance with organizational policies
Module 7	Data Breach and Security Incident Reporting	• Understand what constitutes a data breach or security incident in the research context • Know the step-by-step procedures for immediately reporting any suspected or actual incidents, including who to contact and what information to provide

APPENDIX A10: DATA PROTECTION AND SECURITY ACKNOWLEDGEMENT FORM

Document Information

Document Title: PC-Kenya Data Protection and Security Policy

Version Number: [Insert Version Number Here]

Effective Date: [Insert Effective Date Here]

Acknowledgment:

By signing below, I acknowledge that:

1. I have received a copy of the PC Kenya Data Protection and Security Policy, as identified above.
2. I have read the policy in its entirety and fully understand its contents, including my responsibilities and obligations as [employee/ fellow/ intern/ contractor/ vendor/ subaward recipient] of PC Kenya
3. I understand that this Policy is for informational and guidance purposes and does not constitute a contract, either express or implied, between the organization and me.
4. I unambiguously agree to comply with all policies, procedures, rules, and guidelines outlined in this document and any related data protection and security standards or directives issued by PC Kenya.
5. I acknowledge that any violation of this Policy may result in disciplinary action, including termination of employment/engagement, or legal action depending on the nature and severity of the violation.

Employee/Consultant Information

Full Name (Printed): _____

Employee ID (if applicable): _____

Signature (Physical or Electronic):

_____

Date of Signing: _____

Supervisor/Designated Authority Confirmation (optional)

Full Name (Printed): _____

Title: _____

Signature: _____

Date: _____

Instructions:

Please complete all sections of this form, sign and date it. Return the completed form to Human Resources Department]. A copy will be retained in your personnel file or engagement records.

Thank you for your cooperation in ensuring the protection and security of our data.

APPENDIX A11: DATA CONFIDENTIALITY AGREEMENT FORM FOR RESEARCH ASSISTANTS

This Data Confidentiality Agreement ("Agreement") is made and entered into as of *DD/MM/YYYY*, by and between POPULATION COUNCIL KENYA, located at 3rd Floor Avenue 5, Kilimani ("Organization"), and [***Research Assistant Name***], residing at [Research Assistant Address] ("Research Assistant").

The purpose of this Agreement is to protect the confidentiality of sensitive research data accessed or handled by the Research Assistant in connection with their work for the Organization.

For the purposes of this Agreement, "Confidential Information" shall include, but is not limited to:

- Any and all research data, regardless of format (e.g., written, electronic, oral), pertaining to the research project titled "[Research Project Title]".
- Any information relating to research participants, including but not limited to identifying information, personal data, and research findings.
- Any other information designated as confidential by the Principal Investigator or the Organization.

The Research Assistant agrees to the following:

1. Maintenance of Confidentiality: The Research Assistant shall hold all Confidential Information in strict confidence and shall not disclose it to any unauthorized person or entity. This obligation extends both during and after the termination of their engagement with the Organization.
2. Restrictions on Use and Disclosure: The Research Assistant shall not use, disclose, reproduce, or distribute any Confidential Information for any purpose other than the specific research activities authorized by the Principal Investigator or the Organization.
3. Secure Data Handling: The Research Assistant shall handle, store, and transmit all Confidential Information in a secure manner, in accordance with the following requirements:
    - Adhere to all applicable encryption standards.
    - Comply with all access controls implemented by the Organization.
    - Follow all physical security measures as outlined by the Principal Investigator and the Organization's policies.
4. Reporting Potential Breaches: The Research Assistant shall immediately report to Principal Investigator/Data Manager/Data Protection Officer) any potential or actual data breaches or security incidents they become aware of, regardless of their nature or scale.
5. Return of Data: Upon completion of their research tasks or termination of their engagement with the Organization, whichever occurs earlier, the Research Assistant shall return all Confidential Information, materials, and any copies thereof to the Principal Investigator or a designated authority.

6. Secure Data Destruction: If the Research Assistant is authorized to retain any Confidential Information temporarily, they shall securely destroy or dispose it of in full compliance with the Organization's data retention and disposal policies.

The Research Assistant acknowledges that any breach of this Agreement may result in serious consequences, including but not limited to:

- Legal action
- Financial penalties
- Damage to professional reputation

This Agreement shall be governed by and construed in accordance with the laws of Kenya.

The Research Assistant acknowledges that they have read this Agreement, understood its terms, and agree to be bound by them.

Research Assistant Information

Full Name (Printed): _____

ID (if applicable): _____

Signature: _____

Date of Signing: _____

Supervisor/Designated Authority Confirmation (optional)

Full Name (Printed): _____

Title: _____

Signature: _____

Date: _____

REFERENCES

European Union. 2016. General Data Protection Regulation (GDPR). https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679.

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Population Council, Inc. 2025. Research Data Security. New York: Population Council, Inc.

Republic of Kenya. 2019. The Data Protection Act No. 24 of 2019. Nairobi: Republic of Kenya.

Republic of Kenya. 2021. The Data Protection (General) Regulations, 2021. Nairobi: Republic of Kenya.