

## Research Ethics Approval

9 February 2023

Stoyan Mihaylov, PhD.  
Junction Bulgaria  
122, Cherni Vrah Blvd.  
1407 Sofia, Bulgaria

RE: Ethics Review Board findings for: *Formative Evaluation of the State Programmes for Development of Education with the Focus on Inclusivity* (HML IRB Review #680KAZA23)

Dear Dr. Mihaylov,

Protocols for the protection of human subjects in the above study were assessed through a research ethics review by HML Institutional Review Board (IRB) on 31 January – 09 February 2023. This study's human subjects' protection protocols, as stated in the materials submitted, received **ethics review approval**.

You and your project staff remain responsible for ensuring compliance with HML IRB's determinations. Those responsibilities include, but are not limited to:

- ensuring prompt reporting to HML IRB of proposed changes in this study's design, risks, consent, or other human protection protocols and providing copies of any revised materials;
- conducting the research activity in accordance with the terms of the IRB approval until any proposed changes have been reviewed and approved by the IRB, except when necessary to mitigate hazards to subjects;
- promptly reporting any unanticipated problems involving risks to subjects or others in the course of this study;
- notifying HML IRB when your study is completed.

HML IRB is authorized by the United States Department of Health and Human Services, Office of Human Research Protections (IRB #1211, IORG #850, FWA #1102).

Sincerely,



D. Michael Anderson, Ph.D., MPH  
Chair & Human Subjects Protections Director, HML IRB

cc: Raushan Ibrasheva, Zhanar Zhumabekova, Zhaiyk Sultan, Tatiana Aderkhina, Penelope Lantz, JD



HML Ethics Review Board

## Research Ethics Review Document

Review of UNICEF Research Project Materials for the Protection of Human Subjects

v.2023.1

This document serves to meet UNICEF ethical standards in research and is the official record of an ethics review. It is designed to ensure effective processes and accountability for ethical oversight and to ensure the protection of, and respect for, child and adult rights within all research, evaluation, and data collection processes undertaken or commissioned by UNICEF. It conforms with the [UNICEF Procedure for Ethical Standards in Research, Evaluation, Data Collection and Analysis](#); Document Number: CF/PD/DRP/2015-001; Effective Date: 01 April 2015, Issued by Director, Division of Data, Research and Policy.

### **The Purpose of Research Ethics Review**

The purpose of an Ethics Review Board (ERB) or Institutional Review Board (IRB) is the protection of human research subjects' rights. These rights include *Respect* for individuals to make free decisions, *Justice or equity* regarding distribution of the burdens and benefits of research, and *Beneficence* or the obligation to do good and avoid harm.

ERBs review research protocols that involve the collection and analysis of data from human subjects to ensure that ethical standards are upheld. This is to protect the rights and welfare of subjects and to ensure that:

- subjects know the purpose of the study and are not placed at undue risk;
- participation is voluntary and confidential;
- subjects are provided and agree to informed consent prior to their participation;
- relevant protocols are in place to assure subjects' protection and safety, and;
- data collection and analysis does not result in the violation of privacy or discrimination.

Before issuing approval, the ERB must determine that the following requirements are satisfied:

- informed consent is sought from each subject or the subject’s legally authorized representative;
- the proposed research design is scientifically sound and that risks to subjects are minimized;
- any risks to subjects are reasonable in relation to anticipated benefits;
- subject selection is equitable;
- safeguards are included for subjects likely to be vulnerable to undue influence or coercion;
- subjects’ safety, privacy, and confidentiality are maximized.

<b>Materials Requested for Review:</b>	<b>Also, please include:</b>
<ol style="list-style-type: none"><li>1. Inception Report / Research Protocol, containing, e.g.,: specific aims or objectives, research questions, study design, subject recruitment, subject protection and data protection plans.</li><li>2. Copies of all Informed Consent documents.</li><li>3. Copies of all data collection instruments.</li></ol>	<ol style="list-style-type: none"><li>4. Written protocols to ensure subjects’ safety.*</li><li>5. Written protocols for the protection of human subjects’ identities.*</li><li>6. Written protocols for the protection of data.*</li><li>7. Other relevant documents.</li></ol> <p>*These may be statements incorporated into research plans and/or embedded in a single protection protocol.</p>

HML IRB is an autonomous committee authorized by the United States Department of Health and Human Services, Office for Human Research Protections (IRB #1211, FWA #1102, IORG #850), to review and approve research involving human subjects before the start of research, and to conduct annual reviews of that research independent of affiliation with the research organization submitting materials for review.

Please submit your materials in English for review to:  
D. Michael Anderson, PhD, MPH, HML IRB Chair & Human Subjects Protections Director  
and Penelope A. Lantz, JD, HML IRB General Counsel  
[unicef@hmlirb.com](mailto:unicef@hmlirb.com)

**HML IRB**  
**1101 Connecticut Avenue, NW**  
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**Washington, DC 20036 USA**  
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## UNICEF Research Ethics Review for Human Subjects' Protections

→ **INVESTIGATORS:** Please confirm your project information and any additional information requested below.

Section 1	<b>Project Overview</b> <b>Please provide any requested information</b>	
1.1	<b>Project Title:</b>	<i>Formative Evaluation of the State Programmes for Development of Education with the Focus on Inclusivity</i>
1.2	<b>HML IRB Research Ethics Review ID#:</b>	680KAZA23
1.3	<b>Initiating UNICEF Official:</b> Name, office, email	Raushan Ibrasheva, Child Rights Monitoring and Evaluation Specialist, Kazakhstan CO, <a href="mailto:ribrasheva@unicef.org">ribrasheva@unicef.org</a>
1.4	<b>Principal Investigator/Project Manager:</b> Name, degree(s), organization, & address	Stoyan Mihaylov, PhD., Junction Bulgaria
1.5	<b>Other Key Personnel:</b> Names & titles	Natalia Mihaylova - Team leader Raya Mihaylova – International Consultant Aliya Bizhanova – National Consultant Kamila Rollan – National Consultant Nurlan Imangaliev – National Consultant
1.6	<b>Contracting Firm:</b> Name & address	Junction Bulgaria Ltd. 122, Cherni Vrah Blvd. 1407 Sofia, Bulgaria
1.7	<b>Primary study site(s):</b> CO, RO, countries	Kazakhstan: Almaty city, Almaty region, Astana city, Turkistan oblast, Atyrau city, Pavlodar
1.8	<b>Project duration:</b> Dates from -- to	October 2022 – March 2023
1.10	<b>Duration of Subjects' Participation:</b> Dates from -- to	February – March 2023

1.11	<b>Thematic Area/Areas:</b>	Education	Child Protection	Indicators/SDG
1.12	<b>Target population:</b>	National and local government		

1.13	<b>Date of ERB Request</b>	31 January 2023
1.14	<b>Date(s) ERB Comments Returned</b>	07 February 2023
1.15	<b>Date Final Documents Received</b>	09 February 2023
1.16	<b>DATE OF ERB APPROVAL</b>	09 February 2023

## UNICEF Ethics Review Process

HML Ethics Review Board (UNICEF LTAS 42107154) will conduct a research ethics review of submitted materials and make comments below under **Additional Information Needed**. We will then return this template for responses from investigators.

Please respond to **our comments** in **another colour**, directly under each comment.

- Please provide any requested or revised materials, and please note where revisions to your materials may be found by page or paragraph number.
- Please do not alter ERB comments or the format of this document.

This HML ERB review document serves as the official record of the ethics review for the project named below. This document, including all comments and responses, will be retained by UNICEF and HML ERB as a record of this review. Once you and we have agreed on the ethical rights of your research subjects, we will issue a letter of approval.

	<b>Ethics Review Board Criteria of Interest</b>	<b>Additional Information Needed</b> → Investigators: <b>Please respond to ERB info requests in another color directly below the request</b>	<b>X or NA</b> equal <b>PASS</b> (for ERB use)
Section 2	<b>ERB Submission: Are all requested project information, materials, and final documents provided separately or incorporated in text? This includes:</b>		
2.1	Inception Report or Research Protocol, containing, e.g.,: specific aims or objectives, research questions, study design, analysis & dissemination plans	<b>Please keep us informed of any subject protection protocol or research design changes that need to occur in adaptation to the COVID pandemic in the sites of your study.</b> We will keep you informed of any subject protection protocol or research design changes that need to occur in adaptation to the COVID pandemic in the sites of our study	<b>X</b>
2.2	Informed Consent documents		<b>X</b>
2.3	Surveys and data collection instruments	<b>Please add instructions to review and obtain consent in the interview and focus group guide warm up.</b> Please, find attached the revised Inception report with the added instructions in the interview and Focus group guides.	<b>X</b>
2.4	Written protocols to ensure subjects' safety		<b>X</b>
2.5	Written protocols for protection of subjects' identities		<b>X</b>
2.6	Written protocols for protection of data		<b>X</b>
2.7	Other relevant documents		<b>X</b>
2.8	Is <i>UNICEF Procedure for Ethical Standards</i> cited? <b>Cited</b>		<b>X</b>
2.9	Have informed consent and data collection instruments been pre-tested?	<b>Please respond.</b> The consent form and data collection instruments are developed according to the requirements of UNICEF Procedure for Ethical Standards. In the inception phase	<b>X</b>

		of the project the interview guide and consent form were pre-tested.	
2.10	Are all submitted documents final versions?	Please respond. Yes	X
2.11	May the final protocol and instruments be included in an internal UNICEF searchable database for colleagues to learn from your work?	It will be included into UNICEF's Evaluation and Research Tool  <a href="https://eisi.unicef.org/">https://eisi.unicef.org/</a>  INCLUDE	X
2.12	Additional comments or suggestions		X
Section 3	<b>Research Design: Do submitted materials describe the proposed research? This includes:</b>		
3.1	Is the study's background, rationale, and study design scientifically sound?		X
3.2	Type of data collection: a. survey questionnaire..... b. subject interview..... c. key informant interview (KII).....X d. focus group discussion (FGD).....X e. secondary document (desk) review.....X f. on-site observation.....X g. case study..... h. physical measurements ..... i. biological specimen ..... j. other.....		X
3.3	Is the type of data collection appropriate for this study design?		X
3.4	Are secondary data (desk review including documents, reports, publications): a. publicly available..... b. not publicly available containing personally identifiable information (PII).....	Does any of the secondary data contain PII? No	X

	c. not publicly available containing no PII.....		
3.5	Are types of data and variables in the secondary data set described?	Please describe. Yes, they are described in the Inception report, in 6.1.1. Desk Review and Secondary Data Analysis and 8.1. Annex 1 Evaluation matrix	X
3.6	Is how investigators' access to the secondary data described?		X
3.7	If the secondary data contained subject records, did subjects consent to reuse of their data?		X
3.8	Does study involve intervention, treatment, comparison, or control groups?		X
3.9	Number of Data Collections: a. one-time only.....X b. two or more (e.g., pre-post) .....		X
3.10	Sample size: Approximate total $n = 100$		X
3.11	Are any subjects children (<18 years old)? 14 – 17 yo		X
3.12	Does study include the use of technologies (e.g., on-line data collection or intervention, <i>U-Report</i> )?		X
3.13	Additional comments or suggestions		X
Section 4	<b>Subject Risks: Are risks reasonable in relation to any benefits to subjects and to the importance of knowledge that may be expected to result from the research?</b>		
4.1	Is the research <i>Minimal Risk Only</i> ?: This means the probability and magnitude of anticipated harm or discomfort is no greater than ordinarily encountered in daily life or during performance of routine physical or psychological exams or tests.		X
4.2	Does the research involve <i>greater than minimal risk</i> , but where risks are justified by anticipated benefits; where the relation of the anticipated benefits to risks is at least as favorable as available alternative approaches; and where the intervention or procedure is likely to yield		X

	generalizable knowledge? If so, are mitigating procedures described?		
4.3	Do study objectives show that risks are reasonable in relationship to expected gains and benefits are clearly articulated?		X
4.4	By their participation, are subjects vulnerable to any of the following?: a. physical risk ..... b. psychological risk .....X c. social risk ..... d. economic risk ..... e. legal risk ..... f. political risk ..... g. employment risk..... h. academic risk..... i. religious risk..... j. other.....	You identify psychological risk for subjects. Is this for all subjects? Please specify what the psychological risk is, and which subjects are at risk. The interview guide for children does not include per se sensitive or harmful questions. However, some of the questions may cause psychological distress from the past situations.	X
4.5	In event of any of the above risks, do protocols describe clear strategies to mitigate risks?	How will you mitigate the above risk? The guide for FGD take into account the culture, local language and terminology. The FGDs will be conducted by experienced moderators in order to avoid such situations. The way information is collected will minimize distress caused to children. For example: <ul style="list-style-type: none"> <li>• the sensitive questions are positioned in the middle of a focus group session to allow the children to warm up and cool down from these topics</li> <li>• we will take breaks during the discussion</li> <li>• the research will be conducted in a friendly and comfortable environment</li> </ul> We will provide information or encourage participants to seek help when an unmet need is disclosed. Debriefing children at the end of the research can help identify any needs.	X

4.6	Does the study request information or opinions where public disclosure may result in danger, limitations to future freedoms, or access to services?	No	X
4.7	Do gender, ethnicity, or other demographic characteristics -- or grouping of subjects by any of these characteristics, especially in FGDs -- increase subject risk?	How do you plan on including children not in school in school based focus groups? We will count to UNICEF and the local authorities to provide contacts of service providers and NGOs who work with out of school children.	X
4.8	If a subject discloses or is suspected to be at risk outside the study, are procedures in place to address or report risk and refer subject for relevant support?		X
4.9	Is local reporting abuse of children mandatory? If yes, has consideration been given to the impacts and consequences of mandatory reporting?	Is there a form or formal referral process for reporting abuse? If so, please describe or provide the form. Please, find the protocol in Annex 9 in the Inception report.	X
4.10	Additional comments or suggestions		X
Section 5	<b>High Risk: When subjects are vulnerable to heightened risk have additional safeguards been included to protect their rights and welfare?</b>		
5.1	Can subjects be perceived as vulnerable, including: children, especially unaccompanied or separated (UASC); lacking WASH, food, shelter, or medical care; refugees in conflict or post conflict; those in natural, ecological, or disaster settings; mothers & pregnant women; forced migrants and illegal or undocumented immigrants; prisoners or persons in institutions including orphanages or juvenile justice systems; gang members; those with mental or physical illness or disability; those with HIV/AIDS; those at economic or educational disadvantage; persecuted minority groups, or under high familial, peer, or social pressure? If yes, are study-specific protection protocols provided?		X
5.2	Does the sampling strategy target people at risk for issues such as: violence, torture, abuse, kidnapping;		X

	sexual exploitation, harassment, prostitution or pornography, female genital mutilation or cutting, reproductive or sexual issues; sexual orientation; child, early or forced marriage; suicide? If yes, are study-specific protection protocols provided?		
5.3	Are subjects involved in any of the following: slavery, including the sale and trafficking of children; forced labour, servitude, forced recruitment to armed groups; war or armed conflict; illegal activities, production or trafficking of drugs; economic exploitation; work that could damage health or safety; removal of organs for exploitation? If yes, are study-specific protection protocols provided?		X
5.4	Does the study request information relating to illegal activities? If yes, is an MOU in place with government to ensure that no participant is prosecuted? Have participants been notified of this agreement?		X
5.5	Additional comments or suggestions		X
<b>Section 6</b>	<b>Recruitment: Do submitted materials describe subjects and the recruitment process?</b>		
6.1	To what extent are subjects identified: a. names are recorded with responses..... b. names recorded separate from responses..... c. no names are recorded .....X d. other PII is recorded..... e. no PII is recorded .....X f. subjects are given a unique identifier..... g. other.....	How will you conduct remote data collection with no subject names or PII? Via Zoom. The recording will be started after the introduction.  How will you communicate the date and time of the focus group or arrange for them to participate remotely? Via email, providing link for Zoom and invitation to specified date and time. We will send the invitations to the institutional email addresses.	X
6.2	If subject name or any other PII is recorded, are procedures included for how this info will be kept separate from responses?		X
6.3	Are subject recruitment procedures & sampling strategy adequately described?	What if a selected school does not want to participate?	X

		<p>Another school will be selected according to the same criteria.</p> <p>How will you screen and recruit for your subject types described on p.29 for FGDs? The screening and recruitment will follow the steps below:</p> <ul style="list-style-type: none"> <li>Selecting the school according to the preliminary defined criteria, described in the inception report (page 30 in the inception report);</li> <li>Selecting the participants by screening questionnaires implemented by the school staff (Annex 4 in the Inception Report)</li> </ul>	
6.4	Do recruitment procedures clearly describe ways and means to ensure privacy of subjects throughout the recruitment process?		X
6.5	If subjects are children or other vulnerable groups, are materials (e.g.: survey instruments, focus group topics, etc.) age appropriate?		X
6.6	If subjects are children or other vulnerable groups, or if subject matter is sensitive, is recruitment sensitive to subjects' potential vulnerabilities (real or perceived) and does it ensure privacy throughout recruitment?	<p>If schools distribute and collect the parental consent forms for child subjects, is there any risk to child subjects in having the schools know if they participate or refuse? There is no risk as there is no specific interest of the school to know whether the child participates or not.</p>	X
6.7	Do recruitment procedures show indication of bribery, coercion, intimidation, compulsion, pressure, or force?	<p>In your ICs you ask; "Are you willing to participate in this study," and "If no, explain why." The same for children. However, if an individual does not want to be in your study you cannot collect information from them. Please remove this question. Done</p>	X
6.8	Is recruitment of some members of the population and not others likely to result in resentment for either		X

	inclusion or exclusion? Have strategies to address this been adequately described?		
6.9	Are potential subjects likely to conflate participation with potential or actual goods or service provision? Have strategies to address this been adequately described?		X
6.10	If subjects are paid, compensated, provided a gift, or provided other benefits or services for participation, is the incentive described and justified as non-coercive? None	Any subject compensation? If so, what and how much? There are no incentives foreseen for any participants.	X
6.11	Additional comments or suggestions		X
Section 7	<b>Informed Consent: IC is a negotiation whereby subjects are informed about the study and their rights, and they agree to participate voluntarily. IC must be sought from each subject or the subject's authorized representative confirming this process.</b>		
7.1	Type of Informed Consent: a. written & signed .....X b. written not signed ..... c. written & signed by authorized representative....X d. written with online checkbox..... e. verbal & signed or recorded..... f. verbal & signed by authorized representative.... g. verbal not signed or recorded..... X h. active..... i. passive..... j. other .....	How and from whom will you obtain consent to conduct the observations? We will obtain verbal consent for observation of the school from the principle (added to 7.1)	X
7.2	Are the processes for obtaining each IC adequately described?		X
7.3	Does the IC include a clear and simple invitation to participate, an explanation of what the subject will be expected to do, and why they are being recruited?		X
7.4	Does IC include the purpose of the research presented in simple, age, education, and culturally appropriate local language?		X

7.5	Does IC state that participation is voluntary, and subject may choose to not respond to any or all questions or may withdraw anytime without consequences?	Please state clearly that participation is voluntary and participation or refusal will not impact any benefits or services (parents and children) or employment (teachers). The text is included in Consent and Assent forms.	X
7.6	Does IC include the expected duration of the subject's participation (hours/minutes)?		X
7.7	Are subjects given a clear indication of who will have access to their responses and in what form?		X
7.8	Are subjects given a clear description of potential re-use or sharing of data, with whom, and in what form?		X
7.9	Does IC include a description of any risks or benefits to subjects?	You noted the potential for psychological risk in your request for ethical review. Please include a statement of risk in all consent/assent forms. In the parental consent form there is a text: "The interview guide for children does not include per se sensitive or harmful questions. However, if there are any questions, which would potentially cause the child to disclose information regarding abuse, violence, neglect or similar occurrence or if the child decides to disclose such information him/herself, researchers are obliged to report this information. We will provide information or encourage children to seek help if an unmet need is disclosed.  Also, there is a text in the same form: "If they do not wish to answer a question, they don't have to and they can decide to leave the discussion."  In the Assent form the corresponding statement is "If you do not wish to answer a question, you don't have to and you can decide to leave the focus group."	X
7.10	Does IC include a statement describing how confidentiality (or anonymity) will be maintained, and if there are any limitations to confidentiality?	In the parental consent you assure anonymity. However, data collected in a focus group cannot be considered anonymous. The best you can assure is confidentiality. Please revise.	X

		<p>It is revised in the text of parental consent.</p> <p>Please also include your duty to report abuse as a limitation to confidentiality.</p> <p>It is included in the text of parental consent.</p>	
7.11	Does IC provide identity and contact info of investigators? Is the form of contact useful and appropriate given power dynamics and access to resources like phones or email?		X
7.12	For child subjects, is IC being obtained from parent, guardian, caregiver, or authorized representative? If not, is a justification provided for why this is unnecessary?	<p>How will you obtain parental consent for children not in school?</p> <p>Through service providers and NGOs who work with out of school children.</p> <p>Please do not ask parents to give a reason why their child cannot participate in the study on the parental consent form. (See Item 6.7, above.)</p> <p>Done</p> <p>If the FGD will take place during or outside of school hours, please mention in the parental consent form.</p> <p>Done</p>	X
7.13	For child subjects, is their role in the study described adequately and in an age and culturally appropriate manner for them to provide written or verbal assent?	<p>Please confirm you will review the child assent form with each child prior to data collection and obtain consent immediately prior to the FGD.</p> <p>It is reflected in the IR, 6.2. Ethical considerations, page 31. We confirm that we will collect all the parental consent and assent forms of children prior to the FGD.</p>	X
7.14	Do IC materials advise subjects to keep focus group discussions (FGD) confidential from anyone outside the group?	<p>Please include in children's assent.</p> <p>Included in the assent form</p>	X
7.15	Where subjects differ by type (e.g.: age, sex, risk, status, etc.), are IC documents specific for each type?		X

7.16	Where data collection differs by method (e.g.: survey, FGD, interview, audio recording), do ICs cover each method?	If you will audio or video record or take any photos please include in all three consent forms. Done	X
7.17	If IC is written, is a copy left with subjects or there is explanation for not doing so?		X
7.18	Additional comments or suggestions		X
Section 8	<b>Subject Protections: Do submitted materials clearly identify protection against risk?</b>		
8.1	Do materials describe protocols for subjects' safety throughout data collection, analysis, storage, and dissemination?	<p>How will you decide between in-person and remote data collection? The criteria for decision are related to the suitability of the method for the particular target group and the time and flexibility of respondents. The plan is to conduct all the FGDs with children, parents, and teachers F2F, as well as the interviews with school principals and KIIs with the main institutional stakeholders. At the same time, some of the KIIs with main institutions will be organized online due to the busy schedule of their representatives.</p> <p>What tool will be used for remote data collection? We will use Zoom platform with the same interview guides.</p> <p>How will you mask subjects' names or other identifiers during remote data collection? The KIIs which will be online are with representatives of institutions and there is no need to collect/record personal data. We will ask the participants to show the name of the institution instead of their personal names.</p> <p>Where will in-person data collection take place? If is at schools, how will you ensure that you are not overheard by school staff?</p>	X

		<p>The in-person data collection will take place mainly in school environment. We will ask for separate room to conduct the FGDs and KIIs with principles.</p> <p><b>What health and safety precautions will be used for in-person data collection?</b>  We will follow the school rules and precautions, if there are restrictions imposed due to the COVID 19 we will wear masks and will keep safety distance.</p>	
8.2	Are all data collected necessary for the purposes of evidence generation?		X
8.3	Do data analysis and reporting procedures ensure subject confidentiality (or anonymity) and security?		X
8.4	If future contact with subjects is planned, does it provide for confidentiality and data security through the research period and beyond?		X
8.5	Are backgrounds and qualifications of data collectors adequately described?		X
8.6	Have personnel collecting data from subjects, especially child subjects, had ethical training specific to the target group?	<p><b>Who will conduct the focus groups?</b>  Experts with relevant professional expertise in moderation, including in FGDs with children, and certified in Introduction to Ethics in Evidence Generation of UNICEF.</p>	X
8.7	Are personnel collecting data aware of ethical issues that may arise and provided mitigation strategies?	<p><b>Please discuss mitigation and reporting procedures for any risks observed during the school observations portion of the study.</b>  If any risks emerge during the observation, we will inform the school principals and follow the school reporting procedures.</p>	X
8.8	Additional comments or suggestions		X

Section 9	<b>Data Protections: Do data collection and storage protocols adequately ensure subject &amp; data safety?</b>		
9.1	Are data collection tools appropriate and constructed to assure subject confidentiality or anonymity?	<p>FGD recruitment seeks to enroll vulnerable children living in poverty, in social exclusion, in rural areas, and (possibly) with disabilities. How will these characteristics be collected during the recruitment phase? How will they be recorded in the FGD notes?</p> <p>Please, review Annex 4 with screening questionnaires. In the FGD notes we will use only initials without any PII.</p>	X
9.2	Do data collection procedures and environment ensure data security?	<p>Please describe.</p> <p>We are keeping the data in cloud environment which ensures higher level of security due to the authentication procedures for access. Cloud-based user authentication ultimately enables us to access information anytime, anywhere while maintaining control and reducing risk.</p>	X
9.3	Do procedures cover all data types (e.g., written, audio, video, observation), and are protections described for each type?	<p>How will ICs be stored by the schools and by data collectors in the field?</p> <p>We will ask the school principals to collect and store the parental ICs in safety place so to collect them during the data visit. The consent and assent forms will be stored by national and international consultants. For additional information, please, see Annex 10 in IR.</p> <p>How is data being collected for each type of data collection?</p> <p>For online and in-person KIIs and FGDs: By audio files and anonymized transcripts For observations: By observation protocols</p>	X
9.4	If data will be shared with partners, is there a clear agreement or NDA?		X
9.5	Do protocols describe chain of custody of data and protections for data transfer or transmission, management, and de-identification?		X

9.6	Do protocols state length of retention and destruction of raw data (months, years)?		X
9.7	Additional comments or suggestions		X