

Institute of Primate Research

STANDARD OPERATING PROCEDURE (SOP) DOCUMENT

Development, review, and updating of DS&AS policies and strategies

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Approvals			
	Name	Signature	Date
Developed by:	_Patrick Waweru Mwaura_		6 th October; 2025_
Reviewed by:			
Approved by:			

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1. PURPOSE

To establish a standard process for developing, reviewing, and updating data analytics policies and strategies within the Data Science & Analytics Section (DS&AS), ensuring compliance with the Kenya Data Protection Act (2019), institutional regulations, and international best practices (e.g., FAIR principles, GDPR alignment).

2. SCOPE

This SOP applies to all DS&AS staff involved in policy formulation, review, and implementation. It covers policies related to:

- Data governance and management
- Data analytics and modelling standards
- Ethical data use and compliance with national regulations
- Alignment with KIPRE's strategic goals, national health priorities, and global standards

3. PERSONS RESPONSIBLE:

- **Head of DS&AS** Leads policy development and review process; ensures compliance.
- **Policy Development Committee (PDC)** Comprised of DS&AS representatives, Data Protection Officer (DPO), ICT lead, and legal/ethics officer.
- **Director of Research and Product Development** Provides approval before institutional adoption.
- External Stakeholders (as needed) Regulators, ethics review committees, collaborating partners for consultation.

4. FREQUENCY

- **Policy development** As required for new needs, technologies, or regulations.
- **Policy review** Annually by DS&AS, with a **comprehensive review every 3 years** in line with institutional review cycles.
- Interim updates Triggered by significant legal/regulatory changes (e.g., amendments to the Data Protection Act) or emerging best practices.

5. MATERIALS

- KIPRE Strategic Plan (2023–2027)
- DS&AS Strategic Framework & Policy Proposal
- Kenya Data Protection Act (2019) and relevant ICT/Research Acts
- Institutional Data Protection & Sharing Policy 2024

- International standards and guidelines (FAIR, GDPR,RSS, WHO/ASA ethics frameworks)
- Templates: Policy draft template, review checklist, approval form

6. PROCEDURE

Step 1: Needs Assessment

- Identify policy gaps through monitoring, audits, and stakeholder feedback.
- Benchmark against national legislation and international standards.

Step 2: Drafting

- DS&AS prepares a draft policy/strategy document using the institutional template.
- Incorporate provisions for data access, security, anonymisation, quality assurance, and compliance workflows.

Step 3: Internal Review

- Policy Development Committee reviews draft for technical accuracy, legal compliance, and ethical considerations.
- Revisions made based on committee feedback.

Step 4: External Consultation

- Where relevant, circulate draft to ethics committees, regulators, and external partners for input.
- Document all feedback and incorporate as appropriate.

Step 5: Approval

• Final draft submitted to the Director of Research and Product Development and institutional leadership for approval.

Step 6: Dissemination

- Publish approved policy on KIPRE's intranet and data governance portal (foreseeable).
- Conduct staff sensitization workshops and training sessions.

Step 7: Monitoring & Review

- DS&AS tracks compliance and effectiveness via audits, KPIs, and governance dashboards.
- Update policy as needed following annual or 3-year review cycle.

7. REFERENCES

To be updated.