Digital Gender Gap Audit Scorecard Toolkit

The Sustainable Development Goals (SDGs) provide a historic opportunity to halt and reverse growing digital inequality by turning political commitment into concrete interventions. With respect to digital equality, the SDGs commit UN member states to:

- enhance the use of enabling technology, in particular information and communications technology (ICT), to promote the empowerment of women (SDG 5b);
- achieve universal, affordable Internet access in least developed countries by 2020 (SDG 9c); and
- ensure equal access to basic services [and] appropriate new technology for all women and men by 2030 (SDG 1.4).

As web-enabled ICTs become increasingly central to all aspects of everyday life, integrating women's perspectives in all aspects of policy and outreach becomes a major cause for attention.

In order to turn the SDG pledges into action it is critical that digital equality, women's rights, and digital rights advocates are able to present policymakers and the private sector with clear, evidence-based policy recommendations, and to monitor progress towards implementation and impact.

The aim of this toolkit is to...

- Introduce the Digital Gender Gap Audit Scorecard to stakeholders

- Encourage use of the Scorecard as a tool to:
  - develop evidence and monitor country progress towards closing the digital gender gap; and
  - support the development and implementation of policy measures to achieve the Sustainable Development Goals (SDGs) on women and technology, including:
    - Goal 1.4: Ensure equal access to basic services [and] appropriate new technology for all women and men by 2030;
    - Goal 5b: Enhance the use of enabling technology, in particular information and communications technology (ICT), to promote the empowerment of women;
    - Goal 9c: Achieve universal, affordable Internet access in least developed countries by 2020;

- Provide a source of information and resources about global frameworks, SDG commitments and targets related to:

  - [Internet Access and Women's Empowerment](#)
  - [Affordability](#)
  - [Digital Skills and Education](#)
  - [Relevant Content and Services for Women](#)
  - [Online Safety](#)

Data for Gender-Responsive ICT Policy

Governments have a long road ahead to achieve SDG commitments on ensuring equal access to new technology for all women and men by 2030, and leveraging ICTs to empower women. Although nearly every woman we surveyed in our Women's Rights Online (2015) research owned or had access to a phone, the ICT revolution is not yet transforming their lives. Recent data from the International Telecommunications Union (2016) reveals that the digital gender gap is actually increasing in size.

ICT policies can and must address growing digital gender inequality for women to participate and be heard in the digital revolution, yet a majority of countries' ICT strategies and policies remain gender-blind. Of the ten countries reviewed in the first phase of our Digital Gender Gap Audit (2016), only four (Colombia, Nigeria, India, and Ghana) have national or sub-national policies to encourage increased access, training, and use of the web by women and girls. But in many of these cases (as in other countries reviewed), no official, concrete targets exist. A report by the Broadband Commission's Working Group on Gender found that a vast majority of National Broadband Plans fail to include gender targets (2013).

Furthermore, it is nearly impossible to track progress. Despite the opportunities that exist for implementing policies to support women's rights on and through the web, there is very little statistically relevant data on women and ICTs, and none of the major gender equality indices incorporate ICTs. When ICT data excludes data on women specifically, women's social realities become ignored in data and in policy (Hafkin 2002, Partnership on Measuring ICT for Development 2014). Currently, only 69 countries submit gender-disaggregated data on Internet access to the UN agency responsible for tracking this indicator (the International Telecommunications Union (ITU)). The ITU has no gender-disaggregated data at all on other important ICT indicators. As noted by the Partnership on Measuring ICT for Development, "Aggregate data collection masks gender differences, which implies that women's realities remain unrecorded and are ignored, not only in statistics but also in policy". This has to change. SDG 17 commits governments to increase significantly the availability of high-quality, timely, and reliable gender-disaggregated data. Technology has an increasingly vital role in achieving all SDG targets, facilitating access to information and public participation.As the importance of access to and use of ICTs grows, so too does the need — and urgency — to collect gender-disaggregated data on whether and how women are accessing and using these technologies. Without this data, measuring and achieving meaningful progress will remain impossible.

Resources: How to make ICT policy gender-responsive?

- Alliance for Affordable Internet: Affordability Report:
  http://a4ai.org/affordability-report/report/2015/#gender_inequality:_exacerbating_affordability_challenges
- ITU Partnership for Measuring ICT for Development: Measuring ICT and Gender:
  http://www.uis.unesco.org/Communication/Documents/measuring-ict-and-gender.pdf
- Broadband Commission Working Group on Gender:
  http://www.broadbandcommission.org/documents/working-groups/bb-doubling-digital-2013.pdf
- UNCTAD: Empowering Women Entrepreuners through ICT:
  http://unctad.org/en/PublicationsLibrary/dtlstict2013d2_en.pdf
- World Wide Web Foundation: Women's Rights Online: Translating Access Into Empowerment:
  http://webfoundation.org/docs/2015/10/womens-rights-online_Report.pdf
- World Wide Web Foundation: Gender Digital Divide Audit Scorecard:
  http://webfoundation.org/about/research/digital-gender-gap-audit/
- Women in Gender, Science and Technology (WISAT): Gender and ICT Statistics: the Policy Perspeciive:
  http://wisat.org/data/documents/FINAL-Rev.-NH-10th-WTIM-gender-ICT-policy-perspective.pptx
- Nancy Hafkin: Gender Issues in ICT Policy in Developing Countries (see Table 1, page 12):
  http://www.un.org/womenwatch/daw/egm/ict2002/reports/Paper-NHafkin.PDF
- UN Women & ITU Action Plan to Close the Digital Gender Gap:
  https://www.itu.int/en/action/gender-equality/Documents/ActionPlan.pdf

Digital Gender Gap Audit Scorecard

To help ensure that there is sustained pressure for the implementation of policy to achieve the SDGs on women and technology, the World Wide Web Foundation developed a **Digital Gender Gap Audit Scorecard,** with support from UN Women. This Scorecard aims to fill the evidence gap in assessing the digital gender divide by bringing together 14 simple indicators for which reliable empirical evidence exists. Looked at collectively, these indicators can be used to measure country progress towards closing the digital gender divide in the interim until national gender and ICT indicators are developed and data is regularly collected to monitor women's Internet access, use, and digital empowerment. The Scorecard is intended to be a simple, user-friendly tool which aggregates **existing secondary data and proxy indicators to monitor government commitments and implementation of gender-equitable ICT access and digital equality online.**

The results of the Scorecard are intended to be used as a starting point for broad national, regional and global consultations. By providing proxy indicators for data which is otherwise largely unavailable at the national and global levels, the Scorecard is intended to be used to **hold governments accountable for progress on the SDG gender and ICT targets**, by monitoring country-level policy commitments, implementation and outcomes on an annual basis.

The Scorecard can also be used to **identify evidence gaps where data on women and ICTs is missing or not publically available**, despite national commitments to monitor related indicators as part of SDG commitments. Evidence of missing data provides a "Red Flag" on the need for the country to urgently develop and implement a strategy to collect national data on that indicator, and to report data to global bodies like the ITU and UNESCO.

The Scorecard is an "open source" framework which may be further adapted based on indicators and data that are relevant to national and local contexts.

Our inaugural Digital Gender Gap Audit, released in September 2016, covers 10 countries across Africa, Asia and Latin America. **More information and country specific findings can be found here:** http://webfoundation.org/about/research/digital-gender-gap-audit/

Digital Gender Gap Audit Scoring Process:

Review and score indicators
- The Scorecard is based on available secondary data sources and expert assessment methodology. It is informed by background desk reviews and key informant interviews.
- Each indicator is scored by an expert reviewer on a scale of 0 - 10. The scoring criteria was developed so the specific benchmarks for a score of 0, 5 and 10 are comparable across all indicators.[1] Each indicator is weighted the same; all indicators are assigned equal value.
- In cases of missing data for an indicator, that indicator would not be included in the Scorecard. Therefore, missing data does not negatively impact scores but rather signals a "red flag" on the need to collect data on that indicator. The indicator is included once data is available.
- Once a first reviewer has scored the indicators, a second expert reviewer (and third if possible) should check scores and justifications, probing for further justification where the case for a score is not strong or where evidence is missing.

Calculate thematic sub score
- Take an average of the scores in each of the five themes for **thematic sub-scores.**

Calculate country score
- Take an average of scores across ALL indicators for the **country score** (note that it is not an average of thematic sub-scores).

The Scorecard is based on a total of 14 indicators across five themes:

1. Internet Access & Women's Empowerment
2. Affordability
3. Digital Skills & Education
4. Relevant Content & Services for Women
5. Online Safety

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[1] A score of 10 would imply virtually no room for improvement, which is not likely to be the case in the large majority of countries. Similar due care should be exercised when allocating a score of 0 for an indicator. In both cases, the evidence needs to be very strong in support of scores at the extremes (10 and 0).

Gender Digital Divide Audit Scorecard

Indicator	Source	Notes	Scoring Criteria		
Internet Access and Women's Empowerment			For a score of 0	For a score of 5	For a score of 10
National collection and reporting of sex-disaggregated ICT data	ITU gender and ICT data OR Data available at National Statistics Offices (NSOs) on Internet users, disaggregated by gender	The newly developed ITU indicator on 'proportion of individuals owning a mobile phone, by sex' was approved by the World Telecommunication/ICT Indicators Symposium (WTIS) 2014. It is the indicator assigned to SDG Target 5b: Enhance the use of enabling technology, in particular information and communications technology, to promote the empowerment of women. Sex-disaggregated data for this indicator should be collected at the national level starting from 2015 through an annual questionnaire that ITU sends to national statistical offices (NSO). A definition of the	No sex-disaggregated ICT data is systematically collected at the national level (on an annual basis), nor is it available from the national statistical office or any government source.	ICT data on Internet users is disaggregated by sex but it may not be readily accessible online or through national departments.	Sex-disaggregated ICT data is collected and available from the national statistical office or any other government source on female Internet users, female mobile phone ownership or women's empowerment and ICT themes.

			For a score of 0	For a score of 5	For a score of 10
		Indicators assigned to 5b is [here].			
Existence in national ICT strategies or broadband plans of clear time-bound targets to overcome gender and poverty divides in Internet use, and provision of budget for implementation	[Web Index (2014)] as a baseline — with new expert assessment review	Our Web Index (2014) research shows that many national plans or strategies include a rhetorical commitment to gender equity, but fail to translate this into concrete, measurable targets backed by resources. Only 30% of the Web Index countries score higher than a five out of ten for implementing concrete targets for gender equity in ICT access and use. A report by the [Broadband Commission's Working Group on Gender] (2013) found that a vast majority of National Broadband Plans fail to include gender targets.	There is very little, if any, discussion at any level of government about the need to encourage greater access to and use of the web by women and girls, or of increased training in how to use the web for women and girls. There are no related concrete policy targets and budget allocations at all.	There may be sub-national and/or national policies encouraging increased access, training and use of the web by women and girls, but no official national concrete targets exist. In the absence of a national target, there may be public recognition from a senior government figure (e.g. Cabinet minister) and/or parliamentarians encouraging greater female access to the web.	There is an official national policy or directive designed to encourage increased access, training and use of the web for women and girls, with concrete targets for gender equity in this area. Specific and adequate resources and programmes are allocated and identified for that purpose and the programme is being clearly implemented, with evidence of success in some areas where the initiative is being implemented.

			For a score of 0	For a score of 5	For a score of 10
Women's internet access	[Women's Rights Online study (2015)](#) or other national data source on the percentage of women with access to the Internet	This is based on data collected in 2015 through the Women's Rights Online study, representative of urban poor/slum areas	Under 10% of women surveyed reported having used the Internet.	50% - 59% of women surveyed reported having used the Internet.	100% of women surveyed reported having used the Internet.
			For a score of 0	**For a score of 5**	**For a score of 10**
Empowering use of the web	[Women's Rights Online study (2015)](#) — average of data for women's use of the Internet to: a) look for work, b) seek information, c) voice opinion	The data collected in 2015 through the Women's Rights Online study is representative of urban poor/slum areas. In cases where nationally representative data is available on urban and rural women, that data could be used for scoring.	Under 10% of women surveyed reported having used the Internet in the past six months to: a) look for work, b) seek information, c) voice opinion	50% - 59% of women surveyed reported having used the Internet in the past six months to: a) look for work, b) seek information, c) voice opinion	100% of women surveyed reported having used the Internet in the past six months to: a) look for work, b) seek information, c) voice opinion
			For a score of 0	**For a score of 5**	**For a score of 10**
Gender gap in internet access	This indicator comprises the average gender gap across (1) [Women's Rights Online study of poor urban areas (2015)](#) & (2) [Pew Global Attitudes nationally](#)	For the purpose of this Scorecard, the Gender gap is calculated as: % male Internet users - % female Internet users	The online gender gap is more than 80%	The gender gap is 30%	The online gender gap is less than 2%

			For a score of 0	For a score of 5	For a score of 10
	representative survey (2014). Other data may include survey data from National Statistics Offices.	% female Internet users x 100 = Internet Gender Gap			
Affordability			**For a score of 0**	**For a score of 5**	**For a score of 10**
Existence of specific policies to promote free or low-cost public internet access (such as budget allocations for internet access in public libraries, schools and community centers, or provisions for spectrum use by community WiFi options)	A4AI Affordability Drivers Index (2015)	The digital divide is a poverty and gender divide. The very high cost of data and devices hits hardest those who earn the least, particularly women and rural dwellers. Women surveyed in our Women's Rights Online study cited high costs as one of the major reasons that they are not using the internet. In the countries with the highest Internet costs as a proportion of average income, our study found the lowest numbers of women online and the largest gender gaps in internet use. Unless specific steps are taken to make the Internet affordable and accessible to these groups, blanket initiatives to "connect everyone" risk	There is no evidence of a policy or ICT/Broadband Plan that supports/ promotes public and/or access.	There is evidence of policies for public access and shared access in the country, but resources to implement policies and plans are limited and/or there are very few places set up to offer those services/options.	There are specific policies to support public or shared access in order to create affordable access. These have resulted in a situation in which anyone who wants access to services has the option to access them relatively cheaply through a public place or shared WiFi hotspot.

			For a score of 0	For a score of 5	For a score of 10
		deepening existing male/female and urban/rural disparities. SDG 9c commits governments to strive to achieve universal, affordable internet access by 2020. Public access via libraries, community centres, and municipal WiFi schemes — funded by well-run Universal Service and Access Funds — is critical to deliver access to populations who are excluded from connecting.			
Internet affordability (price of 1 GB data / average monthly income)	ITU, World Bank (2014)	High costs are keeping billions offline. Women — who earn almost 25% less than men globally — are particularly impacted by this high cost to connect and, as a result, face limited digital opportunities. SDG 9c commits governments to strive to achieve universal, affordable Internet access by 2020.	The price of 1GB is 11% of more of average monthly income.	price of 1GB is between 6-6.99% of average monthly income	Price of 1GB is less than 2% of average monthly income

		The UN defines affordable broadband as 500MB of mobile data priced at 5% or less of average monthly income. For the purpose of this Scorecard, we adopt the Alliance for Affordable Internet's (2016) new proposed target, of 1GB of mobile data priced at 2% or less of average monthly income.			
Digital Skills and Education			**For a score of 0**	**For a score of 5**	**For a score of 10**
Proportion of ICT-qualified teachers in schools	Web Index (2014) as a baseline — with new expert assessment review	"Not knowing how" to use the Internet is the barrier most widely cited by poor, urban women who don't use the Internet. Digital capabilities are also increasingly critical to maximise women's earnings and employment prospects. Monitoring the "Percentage of youth/adults with ICT skills, by type of skill" is a SDG indicator under Goal 4.4 which commits states to "substantially increase the number of youth and adults who have relevant skills,	Very few — if any — education sector workers are trained in the use of web-powered ICTs to deliver better education services children, and those who are, tend to be in the private education sector. This is not a stipulation or a commitment in any official	A few pilot projects have been implemented in some districts, but there is no systematic uptake; it is not a prerequisite for obtaining teacher qualifications, but it is part of the government's national education sector plan/strategy.	Teachers and administrators in almost all the regions of the country have to receive regular training (at least once every 3 years) on how to deliver better education services using web-powered ICTs, especially to poor and marginalised

| | | including technical and vocational skills, for employment, decent jobs and entrepreneurship."

The World Summit on the Information Society (WSIS) notes that "*Work on removing the gender barriers to ICT education and training and promoting equal training opportunities in ICT-related fields for women and girls, is part of the action line, with early intervention programmes in science and technology targeting young girls with the aim of increasing the number of women in ICT careers as well as promotion [of] the exchange of best practices on the integration of gender perspectives in ICT education.*"

The World Summit on the Information Society (WSIS) also include a target: "*To adapt all primary and secondary school curricula to meet the challenges of the Information* | education sector policy documents and there is no budget allocation for it. | | communities. It is part of the official national education strategy, and it is part of the curriculum and training of all institutions that grant official qualifications to teachers. There is widespread adoption and implementation. |

			For a score of 0	For a score of 5	For a score of 10
		Society, taking into account national circumstances". It is important to note that girls may or may not be exposed to computer classes in schools, as participation in ICT/computer science courses and Internet labs are often optional. In many cases this leads girls to self-select out. Oftentimes boys also are given more encouragement to participate. Designing and implementing digital literacy policies and programmes therefore requires a gender perspective.			
Percentage of women in technology and engineering research and development (R&D) fields	UNESCO indicator: "*Female researchers as a percentage of total researchers in technology and engineering*". "Researchers" are defined as "*Professionals engaged in the conception or creation of*	The number of women in technology and engineering worldwide is alarmingly low, and may be getting worse. The number of women in computing in the United States has fallen from 35 percent in 1990 to just 26 percent today. The drop-off rate for more advanced study in these areas amongst women is generally	The percentage of women in technology and engineering research and development (R&D) is 10% or less	The percentage of women in technology and engineering research and development (R&D) is at least 30%	The percentage of women in technology and engineering research and development (R&D) is at least 50%

	new knowledge, products, processes, methods and systems, as well as in the management of these projects, broken down by field". Engineering and technology include: -civil engineering; -electrical engineering, -electronic engineering, -information engineering; -mechanical engineering; -chemical engineering; -materials engineering; -medical engineering; -environmental engineering; -environmental biotechnology; -industrial biotechnology; -nano-technology; -other engineering and technologies.	high due to stereotypes, the dominance of men in IT fields, industry's lack of policies for inclusion of women, and skills gaps in STEM areas.			
Internet access at secondary schools	UNESCO Data on ["Educational Institutions with Access to the Internet"](#)	This is an official SDG indicator to monitor SDG target 4a. Connecting all secondary and primary schools with ICTs is	No data is collected on this indicator at the national level	50% or fewer secondary schools report having Internet access	Over 90% of secondary schools report

(Note that this is based on data reported to UNESCO, it is not necessarily fully reflective of on-the-ground implementation of connectivity in schools)	Note there is no data available for majority of countries. Therefore, "collection of data" has been included as part of the scoring criteria.	also a [target identified by the World Summit on the Information Society (WSIS).](#) While it is important that primary, secondary and tertiary schools all have access to the Internet, this indicator is focused on secondary schools because of limited available data on primary schools' connectivity.			having Internet access

Relevant Content and Services for Women			For a score of 0	For a score of 5	For a score of 10
Availability of user friendly information via ICTs (including web/Internet, IVR and SMS) about reproductive and sexual health rights and services for women and girls	[Web Index (2014)](#) as a baseline — with new expert assessment review	Web Index [research](#) shows that in 51% of countries the government and/or CSOs/ private service providers do not provide any information on the Web/other ICT platforms about reproductive and sexual health rights and services, or such information is not easy to find, outdated or incomplete so as to render it useless. Complete information about legal rights, reproductive and sexual health rights and services and services available	The government and/or CSOs/ private service providers do not provide any information on the Web/other ICT platforms about reproductive and sexual health rights and services, or such information is not easy to find, outdated or incomplete so as	The government and/or CSOs/ private service providers make available on Web-powered ICT platforms some information about reproductive and sexual health rights and services, but some key information may be incomplete or out of date. The information is easy to find and the language	The government and/or CSOs/ private service providers make available via web-powered ICTs information about reproductive and sexual health rights and services in the main local languages. Such information is factual, objective,

		to victims of gender based violence should be made available on Web-powered ICT platforms. Information should be regularly updated, easy to find and easy to understand (language not too technical). A single web-based, integrated information management system can be a cost-effective basis for the same information to be automatically published, updated and retrieved through many different channels: SMS messaging, IVR telephone hotlines, websites, social media, community radio broadcasts, etc. as appropriate to local circumstances	to render it useless.	is easy to understand (not too technical).	uncensored and presented in a user-friendly, interactive format. It does not contain technical / medical terms that are difficult to understand (for example translating legal statute relating to domestic violence into short and easy to understand FAQ structure with the ability to submit a question in a local language and context). Information provided includes antenatal and postnatal care, contraception and abortion, HIV & AIDS prevention, counseling, testing and

			For a score of 0	For a score of 5	For a score of 10
					treatment, other essential preventive services such as cervical cancer and breast cancer testing, sexual well-being, and sexual violence. The content is structured in accessible ways (e.g. FAQs, interactive search).
Percentage of women personally using mobile financial services	World Bank Financial Inclusion Data/Global Findex (2014): "*Percentage of women personally using a mobile phone to pay bills or to send or receive money in the past 12 months; or receiving wages, government transfers, or payments for agricultural products through a mobile phone in the past 12 months*"	Women's financial inclusion, (including access to banking and other financial services), is vital for women's economic opportunities. According to the UN High Level Panel Report on women's Economic Empowerment: "Research on Kenya's M-PESA highlights the potentially dramatic impacts of digital financial services on women's economic and social well-being. Countries should ensure that digital financial	Less than 1% of women are personally using a mobile phone pay bills or to send or receive money	5%-15% of women are personally using a mobile phone pay bills or to send or receive money	Over 60% of women are personally using a mobile phone pay bills or to send or receive money

	Select country. In "Series" search for: *Mobile account, female (% age 15+) [w2]* 	services are associated with greater access and use among women as well as men. A practical way to accelerate financial inclusion is to move cash payments of social benefits and wages into bank accounts. About 80 million unbanked women around the world receive government transfers and wage payments in cash. Making these payments digitally would expand their financial inclusion".			
Online Safety			**For a score of 0**	**For a score of 5**	**For a score of 10**
Extent to which law enforcement agencies and the courts are taking action in cases where ICT tools are used to commit acts of gender-based violence	[Web Index (2014)](#) as a baseline — with new expert assessment review	Women around the world report being bombarded by a culture of misogyny online and on social media in particular, including aggressive, often sexualized hate speech, direct threats of violence, and harassment, defamation, and "revenge porn" including individuals who use personal/private information.	Neither training nor clear guidelines are provided to the police or the judiciary on how to deal with gender violence carried out using ICT tools. Politicians and	There are some legal and regulatory stipulations in place. Training and guidelines are provided to both police and judiciary, but enforcement is non-existent or very inadequate (few or no arrests made or	Clear legal protection and laws in place. Training and clear guidelines are provided to both the police and judiciary on how to deal with such issues. Implementation

		Violence against women online often leads to self-censorship. Both the Web Index and APC research on government and corporate policies to end VAW online highlight a culture of impunity that currently exists around violence against women online. In 74% of Web Index countries, including many high-income nations, law enforcement agencies and the courts are failing to take appropriate actions in situations where web-enabled ICTs are used to commit acts of gender-based violence. Existing laws that may be invoked in cases of technology-related VAW include: - Gender equality laws/Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) - Laws defining and penalising violence against women —	policy makers have not publicly acknowledged that this is a serious issue in need of redressal. Existing laws may contain loopholes that allow ICT-based violence to escape criminal prosecution.	cases brought to court).	also takes place as evidenced by cases that have been brought to court in practice (regardless of final verdict).

			For a score of 0	For a score of 5	For a score of 10
		either existing as separate laws or contained within a country's penal law - Specific laws penalising technology-related VAW offences - Specific laws penalising ICT offences - Civil laws for damages.			
Existence and robustness of national data protection laws	Open Data Barometer (2016)	This indicator assesses the extent to which there is there a robust legal or regulatory framework for protection of personal data in countries that addresses public and private sectors. According to the Open Data Barometer, implementation of data protection laws globally has been inconsistent. The report notes: "In the past year there have been several scandals over the misuse of personal data collected by government agencies. In South Africa for example, a private company contracted to	A legal or regulatory regime to promote data protection does not exist or is so devoid of precision and/or the understood best practice as to render it useless in practice	A legal or regulatory regime exists but is missing some of the key elements understood to promote best practice around data protection policies, including broad applicability, the right of choice/consent to individuals, the right to access and/or correct one's personal data, clear responsibilities on information holders, and/or the right of redress against both	A legal or regulatory data protection framework exists that is broadly applicable, provides the right of choice/consent to individuals, provides the right to access and/or correct one's personal data, imposes clear responsibilities on information holders and provides a right of redress against

| | | distribute social grants to the poor is alleged to have [misused recipients' data](#) to sell them airtime and loans, while in the UK, there was public outcry when it emerged that the medical records of nearly a million NHS patients may have been [sold to insurance companies against their will](#)." | | private and public bodies that violate data privacy | both private and public bodies that violate data privacy |