

DIS data ethics policy

Introduction

Data ethics is about the ethical considerations an organization should take in relation to the responsible use of data and new technologies. DIS complies with all legal requirements, but recognizes that data ethics goes beyond legal compliance, and that risks may still exist for those whose data is processed legally. DIS has developed the following data ethics policy to ensure that the well-being of those whose data is processed is inherent to the work done by the organization. This is documented here pursuant to section 99d of the Danish Financial Statements Act.

Data types and sources

DIS collects and uses data for purposes closely aligned to the mission and values of DIS. DIS collaborates locally and globally with students, housing partners, local residents, university partners, and others, and uses data from these diverse groups to facilitate connections and fulfill the agreements DIS has with them.

The sources of the data are almost exclusively from the individuals themselves, wherein DIS strives to be transparent with clear, understandable language about what kind of data is needed and why before collecting it. Third-party referrals from existing users are the exception in certain circumstances, which DIS then uses to work directly with the individual. This direct approach ensures the greatest possible transparency and ownership for the those whose data is used.

Use of new technologies

Data is most often used at the human-scale at DIS, and emerging technologies such as machine learning, artificial intelligence, and algorithmic tracking are not in use in any systematic way at DIS.

If in the future, it is identified that the use of emerging technologies could provide specific value to those whose data DIS uses, then ethical evaluations and impact assessments from the users' perspectives would be essential components of that consideration, long before any implementation. This responsibility is rooted in the governance structure detailed below.

Principles for ethical data use

DIS uses the following principles in relation to its use of data in an ethical way:

- Transparency and accountability – It should be clear and easily understandable to those whose data DIS uses, what DIS collects from them and why, and what their recourse is for any questions or concerns about the use of their data.
- User-centered decisions – Considerations about existing and new data uses should keep the 'user', or the students, et al. whom DIS works for and collaborates with, at its heart. This is both in regard to protecting the privacy and well-being of the individual, and ensuring that considerations about the value to the user themselves are determining factors.
- Security for data access and use – DIS continually assesses and improves the security of systems and processes involving data use in the organization. This includes securing against accidental or unauthorized access or disclosure outside the organization, and using purpose-driven limitations to access within the organization. DIS pursues the principle of data minimization and uses clear retention policies to further protect that data it uses.'

- Vendor requirements – DIS uses the systems of and collaborates with third-party vendors, and our responsibility for ethical data use extends to them as well. Whether vendors have a proven track-record of ethical data usage is an essential selection criterion in deciding whether DIS will decide to work with them.
- Employee communication and policies – To ensure that data ethics is an integral part of the work done at DIS, regular communication and awareness-training about safe, legal, and ethical uses of data is in place. All employees with access to data are bound by confidentiality clauses to further protect the data of those whom with we work and collaborate.

Governance

This data ethics policy, and the responsibility for continual ethical assessment of data uses and new technologies at DIS, is anchored in the Data Analytics and Privacy Committee. This committee is integrated with top management at DIS, including the Executive Director and two other members of the Executive team, and is liaised by the Data Protection Officer at DIS to align ethical considerations with legal compliance.

Last revised: February 2, 2023