



Civil society red flags for datafication reforms

Datafication reforms are often presented as improvements in efficiency, transparency, or service delivery. But more data and more connected systems do not automatically strengthen accountability.

These red flags can help civil society ask the right questions and push for data systems that serve the public interest.



Based on evidence from Nigeria, Colombia, and Brazil in the Global Data Barometer (2nd Edition, 2025).



Rules without data.

Laws, policies, or disclosure requirements may exist, but the information needed for scrutiny is missing, incomplete, outdated, or difficult to reuse.



Strong platforms, weak connections.

Procurement, company, political finance, lobbying, ownership, or asset declaration systems may work well individually, but cannot be connected to reveal relationships across sectors.



Integration for administration, limited connections for oversight.

Governments may develop substantial capacity to connect data for administrative purposes while comparable connections remain limited in areas relevant to public oversight.



Uneven visibility.

In the cases examined here, recurring gaps in politically sensitive data—such as lobbying, political finance, beneficial ownership, and asset declarations—remain unavailable or disconnected even where broader digital capacity is strong.



No clear accountability actor.

It is unclear who is responsible for data quality, connecting systems, investigating problems, demanding explanations, or ensuring corrective action.



Technical decisions without public scrutiny.

Decisions about which systems will be connected, for what purpose, under what legal authority, and with what safeguards are made without meaningful opportunities for civil society and affected communities to challenge them.

“The key advocacy question is not simply ‘Is the government becoming more data-driven?’ but ‘What is being made visible, what is being connected, for what purpose, and who can use those connections to demand accountability?’

The same infrastructure that increases state capacity can strengthen democratic oversight—or leave it behind.



A CHECKLIST FOR DATAFICATION REFORMS

1

WHAT DATA ACTUALLY EXIST?

Questions to ask:

- What data does the reform require the government to collect and publish?
- Are the data actually available, complete, timely, documented, and reusable?
- Which relevant datasets are still missing?
- Are politically sensitive datasets—such as lobbying, political finance, beneficial ownership, or asset declarations—less available than other government data?

RED FLAG:

Strong legal or policy commitments are presented as evidence of transparency even though the underlying data remain unavailable.

2

WHAT CAN BE CONNECTED—AND WHAT CANNOT?

Questions to ask:

- Which government systems can exchange information?
- Are there common identifiers and standards that allow records to be matched?
- Can procurement data be connected, where legally appropriate, with company ownership, political finance, lobbying, or asset declarations?
- Which connections necessary for public-interest investigations are missing?

RED FLAG:

Government points to sophisticated individual platforms, but information cannot be connected across institutional or sectoral boundaries.

3

CONNECTED FOR WHAT—AND FOR WHOM?

Questions to ask:

- What is the stated purpose of connecting these datasets?
- Is integration mainly intended to improve services, taxation, eligibility checks, enforcement, or internal administration?
- Are comparable connections available for audit, investigation, journalism, research, or public scrutiny?
- Who can access the connected information, and under what conditions?
- Which relationships become easier to see after the reform—and which remain difficult to trace?

RED FLAG:

Government can connect data for administration, but information needed for public scrutiny remains fragmented.

4

WHO CAN ACT ON WHAT THE DATA REVEAL?

Questions to ask:

- Which institution is responsible for acting when the data reveal a problem?
- Do oversight bodies have access, authority, resources, and technical capacity to investigate?
- Can journalists, CSOs, researchers, and affected communities meaningfully use the information?
- Is there a mechanism for demanding explanations?
- Can findings lead to review, correction, remedy, or sanctions?

RED FLAG:

The reform creates more visibility but no clear pathway from finding a problem to obtaining an explanation, correction, or consequence.

5

WHO DECIDES HOW THE DATA INFRASTRUCTURE WORKS?

Questions to ask:

- Who decides which datasets and systems will be connected?
- Under what legal authority?
- Were civil society, oversight institutions, technical experts, and affected groups involved before the system was built?
- Are decisions about inclusion, exclusion, access, and interoperability documented and open to challenge?
- What privacy, security, and confidentiality safeguards exist, and who can audit them?

RED FLAG:

Decisions about which systems are connected, for what purposes, and under what authority are not transparent or open to meaningful public scrutiny.



Use these questions early. Ask for clear answers.

Push for reforms that make public action visible, connected, and accountable.

