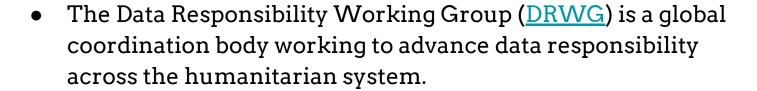
Overview of Revision Process for IASC Operational Guidance on Data Responsibility

InterAction Consultation 18 November 2022

Data Responsibility Working Group







 The primary aim of the DRWG is to coordinate, support, and monitor collective action on data responsibility, primarily through the lens of the <u>IASC Operational Guidance on Data</u> <u>Responsibility in Humanitarian Action</u>.

DRWG CO-CHAIRS AND MEMBERS AS OF NOVEMBER 2022











Members













































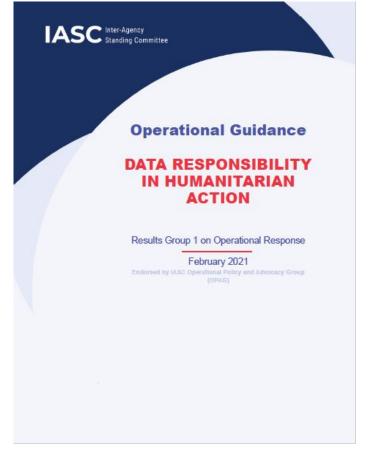


Background on the IASC Operational Guidance

The IASC Operational Guidance on Data Responsibility in Humanitarian Action supports concrete steps for data responsibility in all phases of humanitarian action.

This Operational Guidance offers **a set of principles and actions** that support the implementation of data responsibility in humanitarian action.

It complements and is informed by existing guidance on data responsibility, both from development actors and within the broader humanitarian community.



Endorsed February 2021



Data responsibility in humanitarian action is the **safe**, **ethical and effective management of personal and non-personal data for operational response**, in accordance with established frameworks for personal data protection.

- **Safe** | Data management activities ensure the security of data at all times, respect and uphold human rights and other legal obligations, and do not cause harm.
- **Ethical** | Data management activities are aligned with the established frameworks and standards for humanitarian ethics and data ethics.
- **Effective** | Data management activities achieve the purpose(s) for which they were carried out.

Data responsibility requires the implementation of **principled actions at all levels of a humanitarian response**. These include for example actions to ensure **data protection and data security**, as well as strategies to **mitigate risks while maximizing benefits** in all steps of **operational data management**.

PRINCIPLES FOR DATA RESPONSIBILITY IN HUMANITARIAN ACTION

- Accountability
- Confidentiality
- Coordination and Collaboration
- Data Security
- Defined Purpose, Necessity and Proportionality
- Fairness and Legitimacy
- Human Rights-Based Approach
- People-Centred and Inclusive
- Personal Data Protection
- Quality
- Retention and Destruction
- Transparency

Principles for Data Responsibility in Humanitarian Action

Accountability

In accordance with relevant applicable rules, humanitarian organizations have an obligation to account and accept responsibility for their data management activities. Humanitarian organizations are accountable to people affected by crisis, to internal governance structures, to national and international humanitarian partners, and, if applicable, to national governments and regulatory bodies. To achieve their accountability commitments, humanitarian organizations should put in place all measures required to uphold and monitor adherence to these Principles. This includes establishing adequate policies and mechanisms and ensuring the availability of sufficient competencies and capacities, including but not limited to personnel, resource and infrastructure capacity.¹⁴

Confidentiality

Humanitarian organizations should implement appropriate organizational safeguards and procedures to keep sensitive data confidential at all times. Measures should be in line with general confidentiality standards as well as standards specific to the humanitarian sector¹⁵ and applicable organizational policies and legal requirements, while taking into account the context and associated risks.

Coordination and Collaboration

Coordinated and collaborative data management entails the meaningful inclusion of humanitarian partners, national and local authorities, people affected by crisis, and other stakeholders in data management activities, all where appropriate and without compromising the humanitarian principles for these Principles. Coordination and collaboration should also aim to ensure that appropriate connections are established between humanitarian operational data management activities and longer-term development-oriented data processes and data investments. Local and national capacity should be strengthened wherever possible, and not be undermined.

Data Security

Humanitarian organizations should implement appropriate organizational and technical safeguards, procedures and systems to prevent, mitigate, report and respond to security breaches. These measures should be sufficient to protect against external breaches as unauthorized or inappropriate internal access or manipulation, accidental disclosure, damage, alteration, loss, and other risks related to data management. Measures should be adjusted based on the sensitivity of the data managed and updated as data security best practice

1

¹⁴ This includes upholding the IASC, Commitments on Accountability to Affected People and Protection from Sexual Exploitation and Abuse (2017), available at: https://linteragencvstandingcommittee.org/accountability-affected-populations-including-protection-sexual-availation-and-abuse/comments-64">https://linteragencvstandingcommittee.org/accountability-affected-populations-including-protection-sexual-availation-and-abuse/comments-64">https://linteragencvstandingcommittee.org/accountability-affected-populations-including-protection-sexual-availation-and-abuse/comments-64">https://linteragencvstandingcommittee.org/accountability-affected-populations-including-protection-sexual-availation-and-abuse/comments-64">https://linteragencvstandingcommittee.org/accountability-affected-populations-including-protection-sexual-availation-and-abuse/comments-64">https://linteragencvstandingcommittee.org/accountability-affected-populations-including-protection-sexual-availation-and-abuse/comments-64"

¹⁵ The ICRC Handbook on Data Protection in Humanitarian Action and the IASC Policy on Protection in Humanitarian Action and the IASC Policy on Protection in Humanitarian Action and the IASC Policy on Protection in Humanitarian action and the 18th Intelligence of Intelligence on In

¹⁶ For more information on the humanitarian principles, see OCHA on Message: Humanitarian Principles. Available here: https://reliefweb.int/sites/reliefweb.int/files/resources/oom-humanitarianprinciples- eng-june12.pdf.

AREAS OF ACTION FOR DATA RESPONSIBILITY



DATA RESPONSIBILITY DIAGNOSTIC

A data responsibility diagnostic entails the identification and review of existing laws, norms, policies and standards in the response; processes and procedures; and technical tools for data management.



DATA ECOSYSTEM MAP AND DATA ASSET REGISTRY

A data ecosystem map provides a summary of major data management activities, including the scale, scope, and types of data being processed, stakeholders involved, data flows between different actors, and processes and platforms in use.

A data asset registry provides a summary of the key datasets being generated and managed by different actors in a response.



DATA IMPACT ASSESSMENT¹⁴

A data impact assessment helps determine the expected risks, harms and benefits, as well as privacy, data protection and/or human rights impacts of a data management activity.



DESIGNING FOR DATA RESPONSIBILITY

Designing for data responsibility entails accounting for the *Principles for Data Responsibility in Humanitarian Action* from the outset of a data management activity and monitoring adherence to the Principles throughout the process.



INFORMATION SHARING PROTOCOL AND DATA & INFORMATION SENSITIVITY CLASSIFICATION

An Information Sharing Protocol (ISP) should include a context-specific Data and Information Sensitivity Classification¹⁵, articulate common actions for data responsibility, contain clauses on personal data protection if applicable and specify how to handle breaches to the protocol.



DATA SHARING AGREEMENT

A data sharing agreement (IDSA) establishe the terms and conditions that govern the sharing of personal data or sensitive non-personal data. It is primarily used for data sharing between two parties and typically established at the country level.



DATA INCIDENT MANAGEMENT¹⁶

Managing, tracking, and communicating about data incidents requires standard operating procedures for incident management and a central registry or log that captures key details about the nature, severity, and resolution of each incident



COORDINATION AND DECISION-MAKING ON COLLECTIVE ACTION FOR DATA RESPONSIBILITY

Existing coordination mechanisms can be used to make decisions about collective action for data responsibility at different levels of a response. This includes the Humanitarian Country Team, the Inter-Cluster Coordination Mechanism and clusters/sectors. among others.

System-Wide

Actions	Recommended Approach	Roles and Responsibilities This diagnostic should be completed on an annual basis by the relevant Inferagency mechanism(s) (both the ICCMINCGAIS GCS and the IMWG) with support from OCHA. The diagnostic should be presented to the HCT for reference and as a tool for monitoring progress on key issues. The data ecosystem mapping exercise should be completed on an annual basis by the relevant Interagency mechanism(s) (both the ICCMINCCGAISCG and the IMWG) and presented to the HCT for reference. The ISP should be developed through a collective exercise led by the relevant Interagency mechanism(s) (both the ICCMINCCGAISCG and the IMWG) and presented to the HCT for refevence. The ISP should be developed through a collective exercise led by the relevant Interagency mechanism(s) (both the ICCMINCCGAISCG and the IMWG) with support from OCHA. Once drafted, the ISP should be presented to the HCT for review and endorsement. All stakeholders involved in data management should be aware of the ISP and their respective obligations.		
Conduct a system- wide data responsibility diagnostic. [Dafa Responsibility Diagnostic Template]	The system-wide data responsibility diagnostic provides an overview of interagency / inter-louser / interaction data responsibility measures. It supports joint decision-masking on how to focus and prioritize collective action on data responsibility.			
Generate and maintain a system- wide data ecosystem map. [Data Esosystem Map Temptots]	The system-wide data ecosystem map provides a summary of major data management activities undertaken in the overall response. It requires inputs from clusterisectors and other inter-agency bodies, as well as individual organizations.			
Develop and maintain a system- wide information Sharing Protocol (information Charing Protocol Template)	The system-wide Information Sharing Protocol (ISP) serves as the primary document of reference governing data and information sharing in the response. It should include a context-specific Data and information Sensitivity Classification outlining the sensitivity and related disclosure protocol for key data types in the response.			
Track and communicate about data incidents.	At the system-wide level, tracking of and communication about data incidents should include a central registry that captures key details about the nature, severity, and resolution of different incidents. When appropriate, this may be linked with other system-wide incident, monitoring processes and tools, e.g. security and access monitoring systems. Measures for confidentiality and protection of sensitive data should be taken when establishing such a registry.	The ICCM and IMWG are responsible for establishing and maintaining the central registry of incidents and providing regular updates to the HCT. This registry should be populated with inputs from the clusters/sectors and individual organizations. The HCT, with support from CCHA, is responsible for monitoring data incidents at the system-wide level.		
Support coordination and decision-making on collective action related to data responsibility through existing inter-agency mechanisms.	Inter-agency and inter-cluster/sector structures should provide a common fora or platform for coordination and decision-making on data responsibility at the system-level. These groups should also monitor collective progress and/or challenges and opportunities for data responsibility in the context.	The HCT is responsible for monitoring issues related to data responsibility as needed / on and a hoc basis. The ICCM and IMWG are responsible for providing regular updates to the HCT on their respective areas of focus vis-a-vis data responsibility.		

Cluster/Sector

Actions	Recommended Approach	Roles and Responsibilities This diagnostic should be completed on an annual basis (or more frequently if the response environment changes significantly) by the Cluster/Sector Lead and Co-Lead Agencies in collaboration with their partners.		
Conduct a cluster/ sector-level data responsibility diagnostic [Data Responsibility Diagnostic Template]	The cluster/sector-level data responsibility diagnostic provides an overview of data responsibility measures within the cluster/sector. It informs joint decision-making on how to focus and prioritize actions and support by the cluster/sector on data responsibility in the context. It complements (feeds into and/or builds on) the system-wide diagnostic.			
Create and maintain a cluster/sector data ecosystem map [Femples for Deta Ecosystem Map]	The cluster/sector data ecosystem map should capture all existing data management activities relevant to key response interventions within the cluster/sector. It helps svoid duplication of efforts and supports data sharing within the cluster and the response more broadly. It also informs inputs by the cluster/sector to the system-wide data ecosystem mapping exercise.	The cluster/sector data ecosystem mapping exercise should be completed and subsequently updated on an annual basis by the Cluster/sector Lead and Co-Lead Agencies in collaboration with their partners.		
Develop and maintain a cluster/sector- specific information Sharing Protocol. Information Sharing Protocol Tempists	In cases where a cluster/sector identifies common issues that are specific to data management within their cluster/sector and not sufficiently addressed in the system-wide ISP, an additional ISP should be developed to cate to these needs and endorsed by all cluster/sector members. The cluster/sector-specific ISP should align with and complement the system-level ISP, as well as refevant applicable laws, norms, policies, and standards in the context.	The ISP should be developed through a collective exercise led by the Cluster/sector Lead and Co-Lead in collaboration with their partners. Once drafted, the ISP should be endorsed by all cluster/sector partners and presented to the relevant inter-agency mechanism(s) for reference.		
Offer technical and advisory support to cluster/ sector members on data responsibility.	Allocation of the necessary human and financial resources for data responsibility at the cluster/sector-level is essensified to strengthen data responsibility within the cluster/sector isself and across its members. This is particularly important when members undertake or participate in joint data management activities on behalf of or to the benefit of the cluster/sector overall. Content on data responsibility (e.g. how to conduct Data Impact Assessments, secure transfers of sensitive data, data hygiene, etc.) should be incorporated into cluster's sector-level capacity development activities.	The Cluster/Sector Lead and Co-Lead have a responsibility to advocate for the necessary resources and promote nelevant capacity development activities.		
Design for data responsibility in cluster/sector-led data management activities.	Model different approaches to responsible data management through joint or common activities (e.g. joint needs assessmeth) 3p. 4y.9y (p. oppose cluster/sector-members to different measures and strategies for safe, ethical, and effective data management.	The Cluster/Sector Lead and Co-Lead should ensure that any cluster-led data management activities are designed in-line with this Operational Guidance.		
	Clusters/Sectors may also wish to develop and support the use of common standards and tools for			

Organization

tions	Recommended Approach		
nduct a organization level ta responsibility sgnoetic ta Haspons Bality Diagnostic uplate)			
	a response and/or an organization's own data management policies and/or practices change significantly.		
eate and maintain an ganization level data asset gletry and contribute to ta ecosystem mapping erclass.	Organizations should track all data management activities (e.g. assessments, response monitoring, situational analysis, etc.) but they are beading or involved with in a certral data sest registry. The organization-level data asset registry may also reveal gaps in an organization's data. Organizations should refer to the registry when making rigulas to clustratector- and system- salk data ecosystem maps where relevant.		
	The registry should be updated on a rolling basis and shared widely within a given organization as an institutional reference.		
nduct a Data Impact sessment for ganization-led data anagement activities da Impact Auswament 1 emplate)	Data impact assessments should be conducted before and during data management activities in order to inform project planning, design, and implementation. DIA's should be conducted in an inclusive marrow, involving constation with affected populations where feasible. A data management activity should be redesigned or cancelled if its foreseeable risks outweigh the intended benefits, despite prevention and mitigation measures.		
	The results of a DIA should be shared internally and, in some cases, externally with key actors involved in the data management activity and/or planning a similar activity in the context. This supports consistency in the assessment and mitigation of data-related risks over time.		
	Note: Many organizations have specific policies, requirements and guidelines for how DIA's should be conducted. For those winton do not, the template can serve as a useful reference (see Annex X).		
eign for data aponeibility in ganization-led data anagement activities.	Organizations should incorporate data responsibility into data management activities by design as part of the planning stage for a policylar evercior. This includes for example the following steps and considerations:		
	 Address concerns identified in the Data Impact Assessment for a given activity through appropriate, flexible, and obust prevention and mitigation measures for all major risks identified. When selecting tools for data management, floater complementarity, interoperability (where appropriate), and harmonization (including on data structure). Support measures for the self management of sensitive data (e.g. application of Statistical Disclosure Control for microdata from surveys or assessments, provision of secure solong, etc.) Adhere to relevant guidance and protocols on data responsibility and related processes and procedures, including system-vides and/or relevant dustries/cor level ISPs. This includes ensuring all data that needs to be shared for a specific purpose is made available through appropriate channels in a safe, efficial, and 		

TOOLS AND TEMPLATES FOR DATA RESPONSIBILITY

- Examples of Principles in Practice
- Data Responsibility Diagnostic Tool
- Data Ecosystem Map and Asset Registry Template
- Information Sharing Protocol Template (including a Data Sensitivity Classification)
- Data Sharing Agreement Builder
- Data Impact Assessment Template
- Standard Operating Procedure for Data Incident Management

Information Sharing Protocol TEMPLATE

INFORMATION SHARING PROTOCOL [NAME OF COUNTRY AND/OR SECTOR / CLUSTER]

[DATE]

OVERVIEW

This Information Sharing Protocol (ISP) is designed to support data responsibility – the safe, ethical, and effective management of data – whinn Number OF COLUNTER ANDORS ECTOR! CLUSTER! It establishes a clear approach, standards, roles & responsibilities for data and information sharing across different humanitations functions and activities. It provides a corroom framework for information and data exchange, informed by a shared definition of sensitivity and conditions for disclosure.

This ISP covers all data and information management activities in the INAME OF COUNTRY AMOOR SECTOR ("CUISTER) humanisharin response, for the purpose of this protectors, information refers to both raw data and the information products developed from it. This protector, information refers to both raw data and the information products developed from it. This MILE OF the Country of

The ISP has been developed through a collective exercise led by [NAME OF SECTOR / CLUSTER; ICCMICSGRICCG and IM/VIGI in accordance with IASC guidelines, which state that custer coordinators are responsible for generating and shaping up-to-date custer specific information in order to support inter-cluster information sharing. The ISP has been endorsed by

In this context, this ISP serves as the primary document governing data and information sharing in the (NAME OF COUNTRY ANDIOR SECTOR / CLUSTER) response. It is designed to complement existing policies and guidelines and does not in any way affect or replace obligations contained in applicable legal and regulatory frameworks or organizational policies.

The ISP will be reviewed and updated on a regular basis through a collaborative process overseen by the princent coordination mechanism in NALME OF COUNTRY NALIOR SECTION, or an activation of the process of the proce

PURPOSE AND OBJECTIVES

The purpose and objectives of responsible data and information sharing include:

SC Operational Guidance on Responsibilities of Chatter/Sector Leads and OCHA in Information Management. Available here: ps://www.humanitariannesponse.mis/vn/coardination/cluster/document/lass-operational-guidance-responsibilities-sector-cluster-

Data Impact Assessment

Conducting a Data Impact Assessment helps determine the expected risks, harms, benefits, as well as privacy, data protection and/or human rights impacts of a data management activity.¹

An assessment should inform the design and implementation of data management activities in a way that maximizes benefits and minimizes risks.

 Many organizations have specific policies, requirements and guidelines for how DIAs should be conducted. For those which do not, this template can serve as a useful reference.

Instructions for use:

Overview/Background

Data impact assessments should be conducted before and during data management activities in order to inform project planning, design, and implementation and adjustments / revisions. Diffs should be conducted in an indusive manner, involving consultation with affected populations where feasible. A data management activity should be redesigned or cancelled if its foreseeable risks outweigh the intended benefits, despite prevention and miligation measures.

The results of a DIA should be shared internally and, in some cases, externally with key actors involved in the data management activity and/or planning a similar activity in the context. This supports consistency in the assessment, monitoring and mitigation of data-related risks over time.

Instruction

This temptate data impact assessment is meant for use by humanitarian organizations looking to determine the impact of their data management activities. To complete the temptate, follow the storp below to fill out the assessment table.

1. Determine whom to involve and at which moment(s) the assessment should take pisco. A data management activity will typically be assessed in the design stage, but may be reassessed at regular intervals throughout the activity. Reassessments may also take piace when the discussmence of the activity change significantly, for example when an activity is expanded to a new geographic area, or if more sensitive data is nicholad.

¹ This Data Impedit Assessment Template build spready on the CCHA Carde for Humanitation Data Guidence Notion on Data Impedit Assessments, Including the review of valence assessment belos conduction in inform the Guidence Note. The Guidence Note is available have "their vicewin humanitation conductions not detail make assessmental" in good assessment in a great conduction of the CCHA CARDE CARD CARDE C

Information Sharing Protocol TEMPLATE

Instructions for the Data and Sensitivity Classification

- List the types of data and information that are being collected in your exercise. Examples of types of such data and information are listed in the table below.
 Please consult the table below and carefully read the information and data sensitivity.
- classification which help inform the level of sensitivity of the data or information at hand.

 3. According to the classification in the table, determine the level of sensitivity for each type of data and information and insert them in the corresponding column of the table.

Data and Information Sensitivity Classification for INAME OF COUNTRY AND/OF Data and Information Types information types and indicate level of aggregation, required sensitivity. Examples are included for reference. Low or No Sensitivity Classification: Public Data or information may be if disclosed or accessed national-level aggregate survey publicly disclosed. without proper authorization, are Methods for sharing public data unlikely to cause any Access restrictions (district) harm or negative impacts to affected 3W/4W data (at national and HDX humanitarian actors Other response-specific public sites Moderate Sensitivity Aggregated survey results Classification: Restricted Information or data that Data or information can be if disclosed or accessed shared within a wider without proper 3W/4W data* (for x, y and z humanitarian community, based clusters, this data at XX level is authorization, are likely on a clearly specified purpose to cause minor harm or and related standards for data protection. negative impacts

Data Impact Assessment Template

Description of data management activity	[Insert a description of the data management activity, including the following elements: The data being managed The context to which the activity relates The scale and diuration of the activity The stakeholders involved [Insert a modivation for a selection of the below elements to assess against]						
Assessment Element	Risk	Harm	Benefit	Privacy	Data Protection	Human Rights	
Observation of Impact	[insert observation]	(insert observation)	[insert observation]	[insert observatio n]	[insert observation]	(insert observation)	
Recommend ation for adjustment	[insert recommend ation]	(insert recommend atton)	[insert recommend atton]	[insert recommen dation]	[insert recommend ation]	[insert recommend ation]	





Revision Process

REVISION PROCESS



IASC OPAG Approval and Next Steps

- → IASC committed to reviewing and updating the Operational Guidance through a collaborative and consultative process every two years
- → On 15 June, IASC Operational Policy and Advocacy Group (OPAG) agreed to delegate authority for revision of OG to DRWG
 - → **27 Feb 2023**: Plan to submit final draft to OPAG for formal review and endorsement

REVISION PROCESS

