

Donor Cash Forum Statement and Guiding Principles on Interoperability of Data Systems in Humanitarian Cash Programming

1. Introduction and importance of interoperability

The Donor Cash Forum's (DCF)¹ founding document, the Joint Donor Statement on Cash, states:

“We envisage solutions whereby interoperable, non-proprietary, data registries can allow a level of data sharing between humanitarian agencies and private sector service providers that is safe, secure and improves humanitarian programming through enhanced accountability. Data protection safeguards need to be in place, and people should be consulted on the use of their data.”²

The DCF's ten guiding principles on data interoperability in cash programming are relevant across the spectrum of sector and sub-sector programming along the Humanitarian-Development-Peace Nexus.

Historically, humanitarian cash programmes' information management systems have been fragmented or poorly aligned, hindering data sharing among humanitarian agencies, host governments that are primary duty bearers in responses, and others. Data interoperability sits at the core of many of the main challenges that donors seek to address, including, but not limited to:

- Impeded inter-agency coordination between those implementing cash programmes
- Limitations to enhancing the referral pathways for an integrated and multi-sectoral approach
- Repetitive/duplicative and burdensome registration and other data collection exercises (such as programme monitoring)
- Omission or duplication of crisis affected people from receiving cash and other forms of assistance, and challenges bundling cash transfers where appropriate
- Blockages to sequencing, layering, and integrating interventions and linking with local organisations and governments
- Blockages to achieving longer-term ambitions around linking with social protection systems
- Little to no control by affected populations over the data that humanitarian agencies collect on them
- Inconsistent application of data management, storage and sharing methods and tools to protect affected population data

These and other interoperability challenges can be overcome by establishing context-specific standard operating procedures (SOP), accountable and responsive governance systems, and intuitive structures for data sharing. We define data sharing as *“The ability of organisations to interact towards mutually beneficial goals, involving the sharing of information and knowledge between organisations, through the business processes they support, by means of exchanging data with other systems using common standards”*.³

¹ The Donor Cash Forum is an informal grouping of nine humanitarian donors (ECHO, USG, FCDO, SDC, Canada, Sweden, Norway) seeking to support better cash programming in humanitarian response.

² [Joint Donor Statement on Humanitarian Cash Transfers \(March 2019\)](#)

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https://ec.europa.eu/echo/files/policies/sectoral/thematic_policy_document_no_3_cash_transfers_en.pdf#%20data%20in%20the%20development%20sector.pdf

As well as overcoming the challenges above, enhancing interoperability is crucial to making progress on existing commitments, including Grand Bargain cash sub-commitments 4 and 5:

“4. Collaborate, share information and develop standards and guidelines for cash programming in order to better understand its risks and benefits.

5. Ensure that coordination, delivery, and monitoring and evaluation mechanisms are put in place for cash transfers.”⁴

Several humanitarian initiatives have explicit commitments on interoperability, including the UN Common Cash System (UNCCS),⁵ the Collaborative Cash Delivery (CCD) Network,⁶ and the Barcelona Principles on digital payments in humanitarian response.⁷ The DCF’s guiding principles outlined below will build upon these interoperability commitments to ensure coherency of action among all cash programming actors in the humanitarian system, and will inform UNCCS and CCD’s work. The DCF’s principles will also assist donors in determining funding levels and with performance assessments and evaluations of interoperability initiatives.

2. Shared ambitions

To help steer the development of interoperable information management systems in the humanitarian community, donors and implementers require a shared vision and goals. The DCF seeks to highlight these mutually desired ambitions, to spur further discussions with implementers, technology providers, and others.

Achieving interoperability requires technical solutions, but must be context specific. Mobilising and sustaining political will and addressing data collection and management challenges unique to different countries will remain critical components of all interoperability efforts. The principles set out here will help organisations deliver programming and investments in data collection and sharing systems that will **facilitate the secure exchange of data and information among organisations**.

We hope these principles will guide humanitarian organisations’ data collection and management policies, along with efforts towards building data sharing and interoperability, aiming to increase appropriate transparency, promote responsible data sharing, and **open up closed datasets when appropriate**. In doing so, interoperability should **enhance existing, and facilitate new, partnerships** - not just within existing consortia or framework agreements but also across sectors with actors such as national and local government, non-state actors and the private sector, including financial service providers (FSPs) and technology organizations, where possible and appropriate. The range of actors who should be included in interoperability initiatives will depend on the context, as well as their ability to align with humanitarian and data protection principles. However, new partnerships may be mutually beneficial and support a **transition from emergency assistance to longer term national social protection**.

For affected populations, interoperability can be a **driver for increasing inclusion** in programming and increasing rights via **decentralising control of personal data**, whilst also ensuring stronger data protection and safeguarding. We also hope it will save beneficiaries time and effort through reducing assessment fatigue and/or re-registration.

⁴ <https://www.grandbargain4ngos.org/workstreams/increase-the-use-and-coordination-of-cash-based-programming/>

⁵ <https://reliefweb.int/report/world/un-common-cash-statement-unccs-questions-answers-july-2020>

⁶ https://www.collaborativecash.org/_files/ugd/79d5cf_4bc6650c8c874aaf975a5d369f80e518.pdf

⁷ <https://nextbillion.net/eight-principles-for-digital-payments-in-humanitarian-response/>

At the donor-implementer relationship level, agreement on collective interoperability principles should lead to enhanced effectiveness and efficiency of aid, in line with the Grand Bargain commitments: **increasing value for money**, promoting inclusion and user rights, through creating large economies of scale. This can be achieved through connecting and layering different forms of assistance, as well as ensuring that as much aid funding as possible **reaches its intended beneficiary**. Value for money will also be sought through aligning investments in systems in order to **prevent the development of duplicative or non-compatible interoperability and data sharing models**.

3. Principles

The DCF's guiding principles are structured to move from higher-level to more detailed and technical:

1. **Respect humanitarian principles:** The principles of neutrality, independence, humanity, and impartiality should guide all aspects of the work of humanitarian organisations, including on data. Protection needs of refugees, other forcibly displaced persons and conflict affected populations must be identified and incorporated into any approach regarding data. Interoperability should enhance rather than compromise these principles, and its primary objective should be a more accountable, transparent, and effective response to the needs of crisis affected people.
2. **Put people at the centre:** Investments in interoperability should empower the people and communities from whom data is collected. The needs and rights of affected populations should be prioritised across the data lifecycle, including through involvement in the design, implementation and monitoring of systems which will manage their personal data. Interoperability should not come at the expense of the experience and dignity of crisis affected people. Effective community engagement should take place throughout the data lifecycle, with the ambition for regular two-way communications with communities to ensure they are aware of the status of their data, in line with linked commitments around accountability and participation. Feedback received from communities and individuals, including around destroying data, should be followed. Giving the communities from which data is collected as much ownership as possible should be an overall goal, and control over personal data should be passed as much as possible to the level of the person concerned rather than the agency or donor. Therefore, individuals must be fairly and appropriately informed about their data rights from the start.
3. **Protect rights and respect privacy:** Data should be collected and stored based on harmonised interpretations of data protection commitments and standards. Data collection should take place according to appropriate legal bases, and with the understanding and awareness of the populations from which the data is collected (where possible, with informed consent – but recognising that considerable challenges exist around this). For instance, data should only be collected when the individual has received clear information in a language and, where possible, a format they understand well. Registration data needs to be understood in its complexity – registration data on refugees will contain sensitive information related to the source of persecution, which must be protected and kept private. In addition, appropriate, strong, and effective safeguards for the privacy and security of data, as well as mechanisms for informing data subjects about how their data will and will not be used, should be built into all interoperability initiatives. Data protection impact assessments and mechanisms for the re-verification of stored data should be employed to further advance data privacy and security. Many organisations have existing standards of privacy and data security,

such as the CaLP Network's Data Responsibility Toolkit,⁸ ICRC Handbook on Data Privacy in Humanitarian Setting,⁹ IASC Guidelines on Data Responsibility in Humanitarian Response,¹⁰ and OCHA's Data Responsibility Guidelines.¹¹ We support the application of these standards by agencies, and application of the other principles should not compromise data protection and privacy.

4. **Collaborate and cooperate:** The humanitarian sector as a whole should seek to build a culture that encourages openness and sharing of data, and in which interoperability is seen as a mutually beneficial exercise. Interoperability should be agreed at a system level and implemented at the operational level. This can build on existing frameworks such as the UNHCR-WFP-UNICEF Data Sharing Agreement,¹² and Minimum Core Assistance Delivery Dataset,¹³ expanding beyond the UN. Successful collaboration will depend on political commitment, adequate resourcing, and sufficient time horizons for delivering accountable interoperability, and working to overcome competitive pressures around data access and market share. Interoperable programmes should envisage coordination mechanisms at both the local and global level. Coordination may start between a coalition of willing actors but should aim to be multi-stakeholder, incorporating local actors, civil society, and governments (where relevant).
5. **Governance:** Cooperation between organisations should include the ambition to develop SOPs and appropriate structures for the governance of data sharing at the local and possibly global levels - where possible and appropriate, this should be through a formal collective forum. For cash assistance, this may be the Cash Working Group; initiatives should also be aligned with or integrated into wider interoperability work such as that of the Inter Cluster Working Groups. These structures may be the same as envisaged under principle 4, and should equally allow for multi-stakeholder representation, as well as appropriate dispute resolution mechanisms.
6. **Design for inclusivity:** The goal of interoperability should be to facilitate the access, participation, and inclusion of a wide range of organisations. At the same time, we recognise there is a need also to protect humanitarian space, and that a diversity of approaches is often desirable. Where possible, however, interoperability should be designed to facilitate the sharing of data with local and national actors, including governments where and when appropriate, and local civil society and the local private sector. In particular, building linkages with social protection systems should be a key priority of information management systems for cash programmes where appropriate; this is a key blockage often cited by those working on bringing social protection and humanitarian cash transfers more closely into alignment. Information management systems should be designed to facilitate entry of new actors over time with minimal burden.

⁸ <https://www.calpnetwork.org/publication/data-responsibility-toolkit-a-guide-for-cva-practitioners/>

⁹ <https://www.icrc.org/en/data-protection-humanitarian-action-handbook>

¹⁰ <https://interagencystandingcommittee.org/system/files/2021-02/IASC%20Operational%20Guidance%20on%20Data%20Responsibility%20in%20Humanitarian%20Action-%20February%202021.pdf>

¹¹ https://data.humdata.org/dataset/2048a947-5714-4220-905b-e662cbcd14c8/resource/60050608-0095-4c11-86cd-0a1fc5c29fd9/download/ocha-data-responsibility-guidelines_2021.pdf

¹² <https://www.unhcr.org/602e24a94.pdf>

¹³ <https://www.unhcr.org/5f4fa8a14>

7. **Balance global predictability and local specificity:** Interoperability will be built both on harmonisation and adoption of global principles and common SOPs as well as more granular and context-specific local-level cooperation. Both the local and the global aspects should be taken into consideration when designing interoperability investments, with successful local-level actions being scaled, replicated, and used to inform common global and regional agreements where possible, such as the Collaborative Cash Delivery Network data sharing agreement,¹⁴ and global principles being applied at the local level in data collection, management and sharing activities.
8. **Build on what already exists:** In general, the connection of existing, independent, and sometimes closed data management systems will be preferable to the creation of new systems. Interoperability initiatives should aim to allow for a distributed or federated network, although in some cases centralised data or closed systems may be necessary. Where possible, use of open standards, open data and platforms that prevent lock-in to a specific proprietary technology will facilitate the integration of a range of different systems and actors over time, especially those with fewer resources or access to technology.
9. **Standardisation and harmonisation:** Organisations should cooperate to ensure the standardisation of data structures, exchange methods, and a minimum amount of data variables, including common identifiers, to facilitate the safe sharing of data. Registration, privacy notice documentation and data collection forms should be further harmonised, with due consideration to facilitating compatibility with a range of systems. These efforts at harmonisation should be ensured at the country/crisis level, through leveraging existing multi-stakeholder coordination structures or creating new ones where appropriate fora do not exist.
10. **Invest in interoperability:** Interoperability requires adequate investment. Where possible, existing data initiatives should be oriented to be as interoperable as possible. Agencies should also ensure that staff have the right background and skillset, that teams are familiarised with the concept of interoperability and encouraged to view it as a positive, and programmes are designed with data interoperability in mind. This may require new investments in skills and staff, but much can be achieved with changes to current capacities and practices.

¹⁴ <https://www.collaborativecash.org/data-sharing-working-group>