Report

Responsible Data Sharing with Donors: Accountability, Transparency and Data Protection in Principled Humanitarian Action - Towards a Common Approach

1 September and 23 September 2021 | WP1777V2

In partnership with:

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In association with the Government of Switzerland, the International Committee of the Red Cross (ICRC), and the United Nations Office for the Coordination of Humanitarian Affairs (OCHA) Centre for Humanitarian Data

Humanitarian organisations are facing increased incentives to collect and share data for various purposes such as improved coordination, more efficient service provision and accountability. At the same time, they have to ensure that data is only used for humanitarian purposes and does not cause harm to vulnerable populations.[1]

In order to shape shared principles and practices for data sharing, the Humanitarian Data and Trust Initiative (HDTI), convened by the Government of Switzerland, the International Committee of the Red Cross (ICRC) and the United Nations Office of Humanitarian Affairs (UN OCHA) Centre for Humanitarian Data, launched a dialogue process on responsible data sharing between humanitarian organisations and donors at Wilton Park in September 2020.

Following this initial convening, the HDTI commissioned two empirical studies on the risks and constraints associated with humanitarian data sharing as well as related donor objectives and practices. Together, these studies engaged over 50 humanitarian and donor representatives across headquarters and field locations.

In support of these activities and in the lead up to the UN World Data Forum in October 2021, this follow-on Wilton Park meeting in September 2021 was designed to support two aims:

- Facilitate a dialogue around the key findings of the empirical research commissioned as part of the HDTI-Wilton Park dialogue process; and

- Introduce and seek feedback on the draft framework and principles for responsible data sharing between humanitarian organisations and donors.

The dialogue consisted of two virtual sessions:

- **Part I, on 1 September 2021**, took stock of the findings from research on the risks and constraints associated with humanitarian data sharing as well as related donor objectives and practices.

- **Part 2, on 23 September 2021**, focused on a draft framework of principles on responsible data sharing designed to inform a common approach by humanitarian organisations and donors.

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[1] Wilton Park Event Report, "Responsible Data Sharing with Donors: Accountability, Transparency and Data Protection in Humanitarian Action", Thursday 17 - Friday 18 September 2020. Available here: https://www.wiltonpark.org.uk/wp-content/uploads/2020/08/WP1777V-Report-1.pdf

This report draws together the discussions from the plenary and breakout sessions and offers a summary of the key outcomes and next steps from the two-day virtual dialogue.

Discussion of research findings

1. The first part of the dialogue focused on the findings of two research projects commissioned by the HDTI partners following the September 2020 HDTI-Wilton Park meeting.

2. The research conducted by the Global Public Policy Institute (GPPi) assessed how risks related to data sharing with donors may materialise in practice. For this, GPPi conducted 45 confidential interviews with humanitarian staff and donor government representatives, both at field and headquarters level, in addition to a desk review of existing research and guidelines on the identified risks. More information about the methodology and key findings from this research project can be found in the final report.[2]

3. The research by the University of Manchester's Humanitarian and Conflict Response Institute (HCRI) focused on how and why donor governments request data from humanitarian actors. This research involved a desk-review of donor policies, contractual language, and related guidance, as well as expert interviews to help better understand the formal and informal requirements for data sharing. This second research project is still underway; a final report summarising key findings will be published once available.

4. Participants welcomed the contributions of both research projects. They also acknowledged the gaps and limitations in the research as explained by GPPi and the University of Manchester, and agreed that additional evidence generation in this area would add value and should remain a priority for humanitarian organisations and donors.

5. In addition to providing substantive feedback on the key findings of the two projects, participants offered recommendations for linking the research findings to the draft framework for responsible data sharing with donors. They specifically pointed to the importance of ensuring that the framework addresses the key opportunities and constraints identified in the research in order to make the framework robust and evidence-based.

Presentation and discussion of the draft framework for responsible data sharing

6. The second part of the dialogue focused on a presentation and discussion of the draft framework for responsible data sharing between humanitarian organisations and donors. Participants had the opportunity to review the framework prior to the meeting and to provide more detailed feedback during the plenary and break-out group sessions.

7. The plenary session explored two key questions related to the draft framework: (a) does this set of principles meet your expectations in terms of format and level of detail? (b) and are these principles well-suited to reach our common goal and well-tailored to be put into practice?

8. Participants confirmed the pertinence of the framework and pointed out that the principles were generally clearly articulated, usable and concise. The discussion surfaced a number of substantive issues of common interest that should be addressed in the revised framework.

9. Concerning putting principles into practice, many participants considered

[2] Westphal, Florian and Meier, Claudia. Global Public Policy Institute. Research on the *Specific Risks or Constraints Associated with Data Sharing with Donors for Reporting Purposes in Humanitarian Operations.* 6 September 2021. Available here: https://www.gppi.net/2021/09/06/data-sharing-with-humanitarian-donors

implementation as the real challenge, pointing out that it should be very clear as to who is taking responsibility for which actions, outlining consequences (if any) of not following these principles and implementing action plans. Greater clarity on the adoption process would be important - the act of endorsing these principles should ideally generate a feeling of shared ownership.

10. Participants noted that every agency is subject to different obligations; some that may be legal in nature, while others might be internal to each entity. In addition, as revealed through the research conducted for this framework, donors would face a number of other requirements related to counter-terrorism and accountability. Some participants therefore requested clarity as to how the proposed principles took into account different forms of government regulations, specifically, in addition to the references already made to different existing humanitarian frameworks.

11. This raised questions about harmonisation and standardisation more generally, and the need to ensure that we are not 'reinventing the wheel'. In this regard, clear oversight and accountability approaches are key to implementing these principles in order to avoid duplication and to ensure that the added value of this framework is understood.

12. It was noted that data protection permeated all of the principles. There was a suggestion to consider making this a stand-alone principle. Other participants preferred to retain the current approach, where data protection was integrated across the principles of the framework.

13. In break-out groups participants explored in more detail each of the draft principles, as well as the draft framework overall.

Conclusions

14. Overall, participants agreed that the framework was adequate and actionable and there could be a lot of value in having donors and agencies sign on to these principles, which could serve as a reference point for others. The feedback included the following recommendations for improving the draft framework and moving toward widespread endorsement or adoption:

   a. Add a more concrete **problem statement** or rationale to situate the framework.

   b. Include a more concrete **scope** and related definitions to clarify what is covered by this framework and to whom it applies.

   c. Clarify **roles and responsibilities** between donors and humanitarian organisations in the application of each principle.

   d. Clarify how existing **'principles'** and related guidance inform the HDTI-WP framework and recommended '**principled practices'**.

   e. Ensure and clearly explain **how the principles will align with and relate to existing frameworks for data responsibility** including, inter alia, the Inter-Agency Standing Committee (IASC) Operational Guidance on Data Responsibility.

   f. Clarify how this framework relates to **individual government's legal, policy and regulatory instruments**

   g. Explain **the process for endorsement** in the framework so that donor states and humanitarian organisations are clear on how to engage.

   h. Clarify the most **appropriate mechanism** to monitor donors' and humanitarian organisations' adherence to the framework in their collaboration.

Next steps: toward a common framework for responsible data sharing

15. Moving forward, the HDTI partners commit to the following activities to support the revision and finalisation of A Common Framework for Responsible Data Sharing Between Humanitarian Organisations and Donors:

    a. Presentation of outcomes to-date and next steps for the HDTI-Wilton Park dialogue process at the UN World Data Forum in Bern, Switzerland, on 6 October 2021.

    b. Revision of the framework based on feedback provided during the Wilton Park event and subsequent consultations.

    c. Circulation of the revised framework with donor states and humanitarian organisations for an additional round of review and feedback in December 2021.

    d. Finalisation of the framework and presentation for formal consideration and endorsement in 2022.

16. Donor states and humanitarian organisations interested in engaging in these activities should contact the Government of Switzerland for additional information.

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Wilton Park | January 2022

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References

[Data responsibility in humanitarian action: from principle to practice, organised in association with the Centre (WP 1688)](#)

[Digital Dignity in armed conflict: a roadmap for principled humanitarian action in the age of digital transformation, organised in association with the ICRC, Norway, and Switzerland (WP1698)](#)

[Responsible Data Sharing with Donors: Accountability, Transparency and Data Protection in Humanitarian Action (WP 1777V)](#)

HPG background paper for Wilton Park 1777 meeting: Responsible data sharing with donors - Accountability, transparency and data protection in principled humanitarian action (available on request).

[Humanitarian Data and Trust Initiative](#)