

THE CENTRE FOR HUMANITARIAN DATA

GUIDANCE NOTE SERIES

DATA RESPONSIBILITY IN HUMANITARIAN ACTION

RESPONSIBLE DATA SHARING WITH DONORS

KEY TAKEAWAYS:

- Sharing sensitive personal and non-personal data without adequate safeguards can exacerbate risks for crisis-affected people, humanitarian organizations and donors.
- Donors regularly request data from the organizations they fund in order to fulfil their obligations and objectives. Some of these requests relate to sensitive information and data which needs to be protected in order to mitigate risk.
- Common objectives for data sharing with donors include: (i) situational awareness and programme design; (ii) accountability and transparency; and (iii) legal, regulatory, and policy requirements.
- Common constraints related to sharing data with donors include: (i) lack of regulatory framework for responsibly managing sensitive non-personal data; (ii) capacity gaps; and (iii) purpose limitation.
- Donors and humanitarian organizations can take the following steps to minimize risks while maximizing benefits when sharing sensitive data: (i) reviewing and clarifying the formal or informal frameworks that govern the collection and sharing of disaggregated data; (ii) formalizing and standardising requests for sensitive data; (iii) investing in data management capacities of staff and organisations; and (iv) adopting common principles for donor data management.

INTRODUCTION

Donors have an important role in the humanitarian data ecosystem, both as drivers of increased data collection and analysis, and as direct users of data. This is not a new phenomenon; the need for accountability and transparency in the use of donor funding is broadly understood and respected. However, in recent years, donors have begun requesting data that can be sensitive. This includes personal data about beneficiaries and various forms of disaggregated data, such as household-level survey results and data about the delivery of assistance disaggregated by demographic and/or group dimensions (e.g. ethnicity, protection group, etc.).¹

Concerns around requests for such data have led donors and humanitarian organizations to place more emphasis on identifying strategies for data responsibility: the safe, ethical and effective management of data. Data responsibility requires donors and humanitarian organizations to take actions that help minimize risks while maximizing benefits of data. This is particularly challenging in cases where donors request sensitive data. For example, the screening of aid recipients, which is often used to justify requests for personal data, is not only difficult to practically implement, but also highly problematic in terms of principled aid.²

¹ Because there are well-established and accepted standards and mechanisms for sharing financial information with donors, including a role for external audits, requests for financial data are not included in this guidance note. This guidance note deals with sensitive personal and non-personal data.

² Roepstorff, K., Faltas, C. and Hövelmann, S., 2020. *Counterterrorism Measures and Sanction Regimes: Shrinking Space for Humanitarian Aid Organisations*.