Organisational Data Protection Policy

IMN Meeting
30th March 2022

Data Protection

Protecting individuals' Personal Data is an integral part of protecting their life and dignity.

This is why Personal Data protection is of fundamental importance for Humanitarian Organizations."

Handbook on Data Protection in Humanitarian Action

❑ **How do we protect data?**

- Applying institutional, technical and physical safeguards that preserve the right to privacy in the collection, storage, use and disclosure of personal data

YOU ARE RESPONSIBLE for Data Protection

Data Protection

☐ **What data do we need to consider?**

Different categories of Humanitarian data

- context – locations of facilities, humanitarian access, devt needs

- affected people – displacement, location of affected people, individuals

- response – monitoring reports, 3W data, cash and aid distribution

☐ **Why protect data?**

- data can be used for advocacy, delivery of support

- also be used to entrench power, further marginalize vulnerable people

- data can put individuals at risk if their interests are not protected

☐ **Who owns the data?** Rights of the Data Subject

- access, correction, right to erasure, right to object

→ General Data Protection Regulation (GDPR)

YOU ARE RESPONSIBLE for Data Protection

Important Rules

❑ **DO NO HARM**

❑ **The Data subject has rights**

❑ **Consider data protection risks at every step of the data process**

 → SYSTEMS and INDIVIDUAL ACTION

  - collection

  - exchange from field to central systems

  - processing

  - products

  - dissemination of information (data, products…)

  - feeding back

  - storage and discarding information

YOU ARE RESPONSIBLE for Data Protection

Common Data Protection Breaches

❑ Loss/theft of devices

❑ Non restricted access

❑ Not encrypting sensitive files

❑ Not aggregating sensitive info

❑ Emailing personal details

Manage the Data correctly

❑ IT security protection

❑ Internal tools

❑ Encrypt – use codes for individuals

❑ Anonymise – ensure personal data cannot be seen and individuals cannot be traced from the info given

❑ Aggregate – group together results

❑ Data-sharing agreements

❑ Consider protected storage, and how to discard information safely

About Photos and Images

Photos are personal information too!

❑ How people are depicted in images

❑ Whether they were asked permission

❑ Who can see the images

❑ Who can share the images

❑ Who can use the images

MIMU Photo Archive

OCHA Data Sensitivity classification

Information and Data Sensitivity Classification

Sensitivity	Definition	Information and Data Sensitivity Classification
Low or No	Information or data that, if disclosed or accessed without proper authorization, are unlikely to cause any harm or negative impacts to affected people and/or humanitarian actors.[5]	**Public**
Moderate	Information or data that, if disclosed or accessed without proper authorization, are likely to cause minor harm or negative impacts and/or be disadvantageous for affected people and/or humanitarian actors.	**Restricted**
High	Information or data that, if disclosed or accessed without proper authorization, are likely to cause serious harm or negative impacts to affected people and/or humanitarian actors and/or damage to a response.[6]	**Confidential**
Severe	Information or data that, if disclosed or accessed without proper authorization, are likely to cause severe harm or negative impacts and/or damage to affected people and/or humanitarian actors and/or impede the conduct of the work of a response.[7]	**Strictly Confidential**

MIMU Approach

Based on who has access to the data

Blank	**Public**
LEVEL 0	**Requires classification - DO NOT SHARE**
LEVEL 1	**MIMU Internal and few agreed external people**
LEVEL 2	**MIMU Internal Only**
LEVEL 3	**Restricted in MIMU (1-2 persons within MIMU only)**

Rollout MIMU Data Sensitivity Protocol

1. Staff orientation
   - What the system is, how it will work, who is responsible
   - Brief documents outlining the system
   - Management commitment

2. Inventory of current situation
   - Spreadsheet – each staff member = types of relevant info, how stored and labelled

3. Establish restricted permissions for file access

4. Label and organize files and folders

5. Keep it going

A last word

Data Protection is about treating the people whose data we manage with respect and dignity, and ensuring that we always act in their best interests

Be sure to

❑ <u>DO NO HARM</u> – directly or indirectly

❑ Recognise it's a <u>constantly evolving proces</u>s and needs constant attention

❑ More than just <u>following rules</u> and complying with the law – its about <u>our culture and individual attitudes</u> to managing data

❑ We must also consider our <u>organisation's internal policies</u> as well as the <u>growing body of legislation around data management</u>.

Further reading

- *OCHA DATA RESPONSIBILITY GUIDELINES – WORKING DRAFT, MAY 2019*

- *WFP GUIDE TO PERSONAL DATA PROTECTION AND PRIVACY* (JUNE 2016)

- *OXFAM: RESOURCE ON RESPONSIBLE DATA MANAGEMENT*

- *ICRC: PROFESSIONAL STANDARDS FOR PROTECTION WORK* (CHAPTER 6)

- *ICRC: HANDBOOK ON DATA PROTECTION IN HUMANITARIAN ACTION*

- *IOM DATA PROTECTION MANUAL*

- *RESPONSIBLE DATA FORUM:* SHOOTING OUR HARD DRIVE INTO SPACE AND OTHER WAYS TO PROMOTE RESPONSIBLE DATA MANAGEMENT

- *PIM: PROTECTION INFORMATION MANAGEMENT* (A WEBSITE HOSTING RESOURCES TO ENABLE THE COORDINATION, DESIGN AND DELIVERY OF PROTECTION RESPONSES)

- *UNHCR ODMLP*, MODULES 2 AND 21 (UNHCR STAFF ONLY)

- *INFORMATION SECURITY FOUNDATION COURSE* (UNHCR STAFF ONLY)

- *DOING NO HARM IN THE DIGITAL ERA* (PRIVACY INTERNATIONAL AND ICRC)

Further guidance

- SECURITY IN-A-BOX: DIGITAL SECURITY TOOLS AND TACTICS

- ME AND MY SHADOW: TAKE CONTROL OF YOUR DATA
  - The 8 day digital detox

- OXFAM: TAKING PHOTOS IN A HUMANITARIAN CRISIS

- THE CASH LEARNING PARTNERSHIP: *PROTECTING BENEFICIARY PRIVACY*

- INFORMATION COMMISSIONERS OFFICE (ICO)

- GENDER, PRIVACY AND DIGITAL SECURITY, TACTICAL TECH

Guidance in related UNHCR materials:
- UN Staff Regulations,
- Code of Conduct,
- Registration and Resettlement Handbooks,
- RSD Procedural standards, etc.

Relevant links

- **TRACKOGRAPHY:** AN INTERACTIVE MAP EXPLORING HOW THE GLOBAL TRACKING INDUSTRY IS RECORDING YOUR ONLINE BEHAVIOUR.

- **WHAT IS METADATA?**: PRIVACY INTERNATIONAL VIDEO EXPLAINING WHAT METADATA IS AND WHY WE SHOULD CARE ABOUT IT.

- **DO NOT TRACK**: IS A PERSONALIZED DOCUMENTARY SERIES ABOUT PRIVACY AND THE WEB ECONOMY.

- **IN LIMBO**: IS A DOCUMENTARY ABOUT INTERNET PRIVACY, DIGITAL IDENTITY, AND ONLINE COMMUNICATIONS IN WHICH YOU CAN ENTER YOUR OWN DATA ENABLING TO SEE YOUR DIGITAL SELF BEING PEPPERED THROUGHOUT THE FILM.

- **WHY PRIVACY MATTERS**: GLENN GREENWALD, TED TALK

Thank you for your time

Questions?