

# SHIFTING THE POWER IN HUMANITARIAN ACTION

A Case Study on Data Issues in Ukraine

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COLLABORATIVE CASH DELIVERY (CCD) IS A NETWORK OF 14 OF THE LARGEST INTERNATIONAL NGOS WHO COLLECTIVELY DELIVER OVER \$1BN IN LAST MILE CASH AND VOUCHER ASSISTANCE EVERY YEAR.

# www.collaborativecash.org

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# CONTENTS

BACKGROUND	1
DATA LITERACY	2
Why is data literacy important?	2
How did this bring us closer to shifting the power to the data subjects?	2
DATA GOVERNANCE	3
From theory to practice: combining technology with collaboration	4
How did this bring us closer to shifting the power to the data subjects?	4
Future opportunities for the Data Steward Model	5
RECOMMENDATIONS	6

# BACKGROUND

The Collaborative Cash Delivery (CCD) Network includes 14 of the largest international non-governmental organisations (INGOs) working together to achieve more effective, accountable, and impactful humanitarian cash programming. In response to the escalating conflict in Ukraine, five CCD members¹ formed a consortium funded by the Disasters Emergency Committee (DEC), to drive transformative outcomes in humanitarian response in the region. The consortium identified challenges stemming from structural inefficiencies in the humanitarian assistance system, and the rigidity of existing aid delivery models. Through collaboration and innovation, CCD members aimed to address these barriers in the Ukraine humanitarian response.

One critical challenge involved the safe and accountable management of aid recipients' data, which aid providers collect. Although several international data protection standards<sup>2</sup> grant individuals rights to access and control their personal information, aid organisations often retain ownership and control over recipients' sensitive data. Recognising the need for change, World Vision International (WVI) joined the consortium, leveraging its extensive experience in humanitarian data management to **empower affected people with more control over their personal data.** 

In Ukraine, CCD/WVI focused on improving referral systems for aid applicants. After sharing their data with aid providers, individuals find it difficult to track the status of their referrals and understand who is processing them. The project aimed therefore to empower individuals to ask questions about their data, access and manage their personal information shared with humanitarian organisations.

The goal of the project extended beyond shifting the power to aid recipients; it also aimed to redefine how the humanitarian sector handles personal data—treating it as a **shared resource managed together with the people affected,** rather than as private organisational property.

CCD/WVI utilised DEC funding and support from Aktion Deutschland Hilft (ADH) and the European Commission's Humanitarian Office (ECHO) to achieve these changes. This funding enabled the introduction of two workstreams: **Data Literacy** and **Data Governance**. This case study illustrates the accomplishments of each workstream and demonstrates how these achievements have advanced efforts to place the affected populations at the centre of the humanitarian response in Ukraine.

<sup>1</sup> Action Against Hunger, Danish Church Aid, Save the Children, Catholic Relief Services, Norwegian Refugee Council, and World Vision all participated in CCD Ukraine CoP.

<sup>2</sup> For instance: OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data or United Nations Guidelines for the Regulation of Computerized Personal Data Files.

# DATA LITERACY

The **Data Literacy** workstream focused on helping three groups understand data and their data rights: organisations operating in Ukraine, frontline humanitarian workers, and the people affected by the crisis. This was done by introducing self-paced and facilitated training- "Data Class"- covering topics of understanding data and data culture, data subject rights, data quality, governance and sharing, the digital divide, and conducting data protection impact assessments.

# Why is data literacy important?

Even though humanitarian organisations typically explain why they collect personal data, affected individuals often don't recall being informed of the reasons behind this, or don't fully understand them.<sup>3</sup> This may happen because the information is usually given only once, rather than continuously or multiple times. Collecting meaningful consent from vulnerable persons such as people affected by crisis is complex due to the power differences between parties. By improving awareness and understanding of data rights, people become more likely to ask how their data is used, if they can access or 'see' it, and make informed decisions about it.

# How did this bring us closer to shifting the power to the data subjects?

Most participants in the data literacy training were frontline humanitarian workers, typically tasked with engaging affected populations to collect data. It became apparent that additional staff are often hired on a short-term basis to enable timely data collection but may not receive adequate training. However, those who attended the Data Class can now share what they learned with their teams, ensuring key data concepts reach people directly interacting with affected populations.

### **ACHIEVEMENTS**

To date, over **1,000** frontline staff engaged with the **Data Class** digital literacy training which can be accessed as a self-paced module in English, French and Spanish.<sup>4</sup>

The training can also be facilitated for a group.

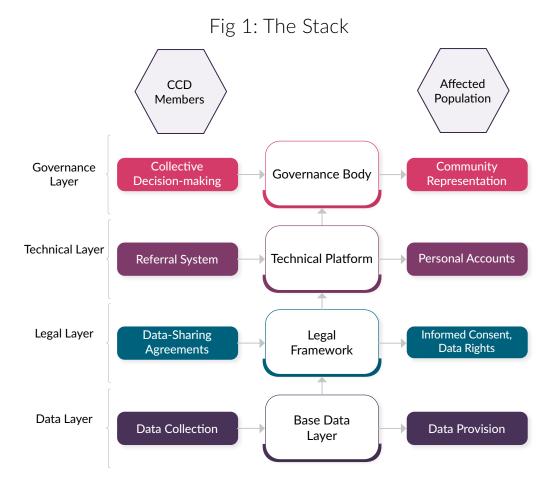
Increasing data literacy helps frontline workers (including those on temporary contracts) communicate more clearly with affected populations about how their data is collected and used and their rights in relation to that data. While this might seem a small step within the larger response, sharing this knowledge **empowers data subjects** to understand their data rights, ask questions, demand access to it, and make informed choices about their data. These are all foundational steps that bring them closer to increasing their control over the data about them.

<sup>3</sup> CCD (2023) Balancing aid and privacy: Perceptions of data protection policies for cash assistance in Ukraine - by Ground Truth Solutions

<sup>4</sup> To learn more and access the modules, see https://www.humanitariandataacademy.com/pages/data-class-registration

# DATA GOVERNANCE

Governance is about how we make decisions. Whilst most conversations about interoperability focus on the technology in use, this workstream helped to broaden these discussions to consider how we make decisions about data sharing that are not solely about technology. Using the **Stack Framework** – an approach focusing on data, legal, technical and governance aspects- the workstream defined actions necessary to place affected individuals at the centre of data management decisions. This workstream focused specifically on solving the challenges of deduplication and referrals between organisations in the Ukraine response.<sup>5</sup>



Based on the discussions about the Stack Framework, a new approach to data governance was proposed: **Data Stewardship.** In this model, a separate entity, or "**data steward**", acts as a bridge between the people affected (data subjects) and humanitarian organisations (service providers). The data steward is a collective body of members (agencies), ideally including representatives from the people affected. It provides the service of deduplication between agencies, facilitates referrals, mediates access requests, and, in some cases, performs functions on that data.<sup>6</sup>

<sup>5</sup> CaLP (2022), "Thematic paper on Registration, Targeting and Deduplication Ukraine Crisis" refers to competing for caseloads and issues around trust between agencies when it comes to data.

<sup>6</sup> CCD Network - Data Governance Pilot - Key Concepts

# From theory to practice: combining technology with collaboration

Various Ukraine-based consortia were engaged to identify a group willing to pilot the Data Stewardship Model addressing the issue of cash assistance referrals. The Ukraine Response Consortium (URC), consisting of ACTED, IMPACT Initiatives, World Vision, CARE, Estonian Refugee Council and Right to Protection, agreed to participate and perform the role of the data steward.

Subsequently, a series of workshops were conducted with the URC members to better understand the context and the current ways of working. The Stack Framework was then used to discuss and agree on a new approach, including what issues the technology should address and what roles each organisation would take in managing the pilot. This "hard part" took significant coordination, with 80% of the effort focused on building agreements and defining responsibilities. This also required a participatory approach involving all consortium members in defining aspects of the group's accountability and governance and outlining the referral systems' practical aspects.

### **ACHIEVEMENTS**

WVI developed an open-source toolkit to allow introducing the Data Steward Model in other contexts providing a foundation to build on.

A **platform** hosting the referral data is maintained by the Ukraine Response Consortium.

The technical setup involving a data-sharing platform was straightforward compared to the coordination efforts needed to align responsibilities, accountability, and governance. ACTED took on the role of the data host, responsible for meeting all technical requirements to ensure appropriate data storage, deduplication process, and platform reporting.

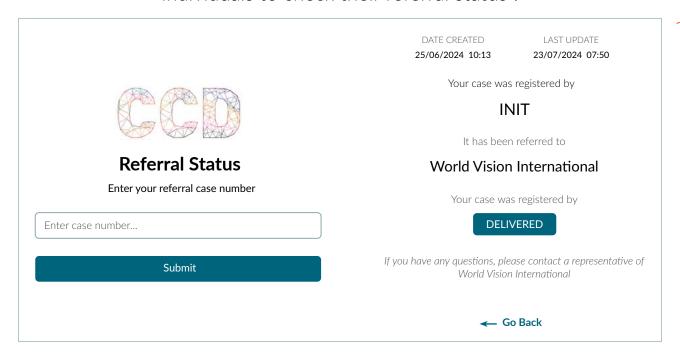
# How did this bring us closer to shifting the power to the data subjects?

The new data platform enables people affected by the crisis to access information about their referrals—a **first in the humanitarian sector**. Upon sharing their data with an aid provider, each applicant is given a unique "case number" and directed to a website where they can check the status of their referral as shown in Fig.2 on the next page.

In this pilot the referrals are submitted to and managed by the URC consortium members. The platform covers referrals for cash assistance and sectoral activities such as WASH, shelter, livelihoods, and protection. Work is being undertaken to integrated URC's sub-partners into the referral process.

With support from data literacy training, affected individuals can understand and exercise their rights by seeing who has their data and requesting it be deleted or for the referral to be stopped. This aligns with international data protection standards, which give people the right to access and control their personal information.

Fig.2 A website connected to the data sharing platform allowing individuals to check their referral status<sup>7</sup>.



# **Future opportunities for the Data Steward Model**

The pilot results show potential for replication and expansion:

- the model could be applied in a similar setting, e.g. with other consortia operating in Ukraine or another coordination group such as Cash Working Group (CWG) Referrals Taskforce, and/or
- adapted to different contexts, with adjustments for local regulations and specific needs.

The toolkit developed by CCD/WVI provides a foundation for replicating or expanding this model and will be available on the **CCD website** in early 2025.

<sup>7</sup> The referral status is fully anonymous- the platform doesn't show any personal information of the applicant. The referral status can be: Under Review, In Assessment, Registered, Delivered.

# RECOMMENDATIONS

# 1 Data training for all

All CCD project teams are encouraged to complete the self-paced (or facilitated) Data Class. This training should be included in each new initiative to build foundational understanding of key data concepts. Intentional efforts should be made to train those **collecting the data from people affected by crises, often short-term staff.** 

# 4 Fexible donor funding

Donors are encouraged to provide flexible funding to support collaborative approaches to data management in humanitarian responses and for efforts to ensure people affected can access the data humanitarian agencies have about them.

### 3 Focus on collective decision-making

Humanitarian agencies need skilled individuals who can make collective decisions rather than focusing on advancing their own organisations' agendas.

### 3 Collaborative approach to data issues

Solving data issues, such as duplication and referrals benefits both humanitarian organisations and people assisted by them. These challenges need to be addressed collaboratively to avoid duplication of efforts and competitiveness between humanitarian actors and to achieve meaningful, positive outcomes for affected populations.

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