Balancing Responsible Transparency: Maximising Risk, Minimising Harm
Welcome!

Please make sure your Zoom display name includes your full name and organisation.

Ask questions via the chatbox

Live interpretation is available in (ENG), (FR), (ESP)
Welcome and Introductions

Session format: Brief roundtable remarks followed by discussion (be prepared to participate!)

Moderator

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Speakers

Stuart Campo
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Branch Chief for Performance Monitoring, Reporting and Data (PMRD), Office of Foreign Assistance, U.S. Department of State

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U.S. Mandates Governing Data Publication and Redaction

- **1974**
  - **Privacy Act**
  - Protects individuals against unwarranted invasions of their privacy resulting from the collection, maintenance, use, and disclosure of their personal information.

- **2012**
  - **Office of Management and Budget (OMB) Bulletin 12-01**
  - Created to further the value of data transparency and promotes responsible data.
  - Includes principled exceptions for when data can be omitted from publication.
  - Exceptions are mainly intended to protect the health and safety of implementing partners and program beneficiaries.

- **2014**
  - **Digital Accountability and Transparency Act (DATA Act)**
  - Introduced two important mandates that have fundamentally improved USG data transparency:
    1) the establishment of a new government-wide data structure for agencies to report federal spending information
    2) the consistent, reliable, and searchable publication of financial data for free access and download.

- **2016**
  - **Foreign Aid Transparency and Accountability Act (FATAA)**
  - Through the passage of FATAA, the USG has taken the initiative to codify the practices of redacting and protecting sensitive information. This policy includes two key provisions for redactions:
    1) to protect the health and security of implementing partners or program beneficiaries
    2) to protect national security interests.
U.S. Data Reporting Process

**Step 1**

**Data Collection**
- Over 20 U.S. government agencies (data owners) submit financial data after the close of each quarter.

**Step 2**

**Quality Review**
- FA-DART conducts a quality review on all submitted data against a standardized set of rules; if the team identifies errors or missing or potentially sensitive data, the data owner is contacted for review. Data is not modified without data owner approval.

**Step 3**

**Data Publication**
- Reviewed and fully approved data is published in cycles to the IATI Registry and to ForeignAssistance.gov.

**Ongoing Review**
- As circumstances may change, FA-DART works in partnership with data owners to make determinations on whether post-publication redactions may be necessary, such as in the event of an emergency.
As part of the transparency community, USAID seeks to understand how other owners of visualization and IATI data query sites are handling post-publication redactions in urgent or emergency situations.
Data Responsibility in Humanitarian Action

Operational Guidance
DATA RESPONSIBILITY IN HUMANITARIAN ACTION

Results Group 1 on Operational Response
February 2021

Distributed by IASC Operational Policy and Advocacy Group (OPAG)

OCHA
DATA RESPONSIBILITY GUIDELINES
OCTOBER 2021

CENTRE FOR HUMANITARIAN DATA

centre for humdata

International Aid Transparency Initiative
Virtual Community Exchange 2
#iatiVCE2
12 and 13 October 2021
## Information and Data Sensitivity Classification

<table>
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<tr>
<th>Sensitivity Level</th>
<th>Data and Information Types</th>
<th>Classification and Dissemination Methods</th>
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| **Low or No Sensitivity** | - HNO and admin level 3 aggregate survey results | **Classification:** Public  
   Data or information may be publicly disclosed.  
   Methods for sharing public data:  
   - ReliefWeb  
   - HRInfo  
   - HDX  
   - Other response-specific public sites |
|                    | - CUDs | **Classification:** Restricted  
   Data or information can be shared within the wider humanitarian community, based on a clearly specified purpose and related standards for data protection.  
   Methods for sharing restricted data:  
   - HDX (via HDX Connect)  
   - Intra-cluster / intra-AGP mailing lists |
|                    | - 3W/4W data* (at admin levels 1, 2 and 3)  
   - Multi cluster/cluster specific Needs Assessments and related data aggregated at admin level 2 | **Classification:** Confidential  
   Data or information can be disclosed within an organization or small community of organizations directly involved in delivering humanitarian assistance, based on a clearly specified purpose and related standards for data protection.  
   Methods for sharing confidential data:  
   - Internal inter-cluster sharing only  
   - Inter-cluster sharing on case by case basis |
|                    | - Aggregated survey results (e.g. aggregated to admin level 1)  
   - Access restrictions (at admin 1 i.e. regional level) | **Classification:** Strictly Confidential  
   Highly limited, bilateral disclosure only. Determined and approved on a case-by-case basis, with assurance of upholding the highest standards of data protections.  
   Methods for sharing strictly confidential data:  
   - Bilateral disclosure between organizations based on formal requests (see Annex 3) and, in some cases, bilateral data sharing agreements |
| **Moderate Sensitivity** | - Aggregated survey results (e.g. aggregated to the household level and with additional disaggregation based on different indicators)  
   - Aid-Worker Contact Details / Lists  
   - Access restrictions (at admin 2 i.e. district level) | **Classification:** Restricted  
   Data or information can be shared within the wider humanitarian community, based on a clearly specified purpose and related standards for data protection.  
   Methods for sharing restricted data:  
   - HDX (via HDX Connect)  
   - Intra-cluster / intra-AGP mailing lists |
| **High Sensitivity** | - Aggregated survey results (e.g. aggregated to the household level and with additional disaggregation based on different indicators)  
   - Aid-Worker Contact Details / Lists  
   - Access restrictions (at admin 2 i.e. district level) | **Classification:** Confidential  
   Data or information can be disclosed within an organization or small community of organizations directly involved in delivering humanitarian assistance, based on a clearly specified purpose and related standards for data protection.  
   Methods for sharing confidential data:  
   - Internal inter-cluster sharing only  
   - Inter-cluster sharing on case by case basis |
| **Severe Sensitivity** | - Raw survey data, e.g. individual survey responses at HH-level data  
   - Personal data of beneficiaries (i.e. beneficiary lists, patient records, etc)*  
   - Personal data of children*  
   - Line lists / line listing data | **Classification:** Strictly Confidential  
   Highly limited, bilateral disclosure only. Determined and approved on a case-by-case basis, with assurance of upholding the highest standards of data protections.  
   Methods for sharing strictly confidential data:  
   - Bilateral disclosure between organizations based on formal requests (see Annex 3) and, in some cases, bilateral data sharing agreements |

* Indicators that are often sensitive due to the nature of the data.
What’s Your Take?

Poll 1
- Zoom poll (will launch on your screen)

Poll 2
- Enter responses in chat:
  - How can publishers better protect sensitive data?
Discussion: Publisher Approaches to Emergency Redactions

Question 1
● How have other publishers (of all sizes and capacities) approached redacting or protecting sensitive data in emergency situations?

Question 2
● Should IATI provide additional information or guidance to publishers in regard to what types of sensitive information they might consider excluding from their IATI datasets?

Question 3
● Following a crisis, what are the implications and responsibilities for third party sites that ingest and republish IATI data? And internet archive tools?
Discussion: Data User Perspectives

Please use the hand raise or chat function to participate.

Question 1
- What is the impact of redactions on data users?

Question 2
- How do these crisis situations affect data traceability?
Thank you for joining us!

Continue the Conversation on IATI Connect:

IATIconnect.org/Responsible-Transparency-Discussion