



Perceptions, Experiences, and Understanding of Data Rights in Cash and Voucher Assistance Programs in Ukraine

Final Learning Report

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Executive Summary

This report examines the perceptions, experiences, and understanding of data rights among beneficiaries of cash and voucher assistance programs in Ukraine, as well as the capacity of humanitarian organizations to manage data ethically. Conducted as part of the Collaborative Cash Delivery network (CCD) and Humanitarian Data Solutions initiatives, the study builds on the findings of the 2023 *Balancing Aid and Privacy* survey while incorporating a mixed-methods approach that includes a phone survey of 52 beneficiaries and key informant interviews with four Ukrainian NGOs trained in data governance.

Key Findings

- **Beneficiary Perceptions and Data Awareness:**
 - A significant portion of beneficiaries (67.3 percent) feel uninformed about how their personal data is processed by humanitarian organizations. Awareness of data rights under Ukrainian law remains split, with 48.1 percent of respondents reporting having awareness while 44.2 percent did not.
 - Trust in data security remains low, with only 3.8 percent of respondents fully trusting humanitarian organizations to handle data securely. Additionally, 86.3 percent reported no violations of their data rights, while 11.8 percent were unsure, and 2 percent reported personal experiences of breaches.
 - Interest in learning more about personal data protection is notable, with 46.2 percent expressing a desire for further education. This indicates potential for greater beneficiary engagement through targeted outreach.
- **Challenges in Data Submission:**
 - Long queues (42.3 percent), complex procedures (23.1 percent), and digital access barriers, particularly among older beneficiaries, were the most frequently reported difficulties.
 - Financial information and health data were the most sensitive categories that beneficiaries were hesitant to share, reflecting heightened privacy concerns.
- **Cascade Training Program:**
 - The cascade training program significantly enhanced organizational capacity for data protection, with participants reporting a stronger grasp of legal and ethical requirements. Many organizations began implementing revised procedures, such as clearer beneficiary consent processes.
 - However, the effectiveness of the cascade model varied. Organizations with strong internal communication structures embraced the model successfully, while others faced challenges in knowledge dissemination due to inadequate trainer preparation or lack of follow-up support. Some organizations reported needing additional resources, such as external consultants or recorded materials, to address these gaps.

Implications and Dynamics

The study provides insights into the evolving perceptions of data protection among CVA beneficiaries and organizational practices in data governance. While methodological differences limit direct comparisons, the findings align with trends identified in the 2023 *Balancing Aid and Privacy* survey. Both surveys highlight persistent challenges around transparency, trust, and awareness of data rights. However, the 2024 survey sheds light on deeper individual experiences, revealing that younger respondents and IDPs are increasingly aware of privacy concerns, likely influenced by broader societal trends in digital literacy.

The analysis also underscores the need for organizations to address operational challenges, such as communication gaps and procedural inefficiencies, to build trust and foster beneficiary engagement. The growing interest in data protection education reflects an opportunity for humanitarian organizations to empower communities while aligning with global standards for ethical data management.

Recommendations

1. Enhance beneficiary education on data rights: humanitarian organizations may consider developing targeted, context-specific educational campaigns on data protection. This includes delivering accessible materials through multiple channels such as in-person sessions, online resources, and printed brochures to address varying digital literacy levels.
2. Improve transparency and communication: humanitarian providers are encouraged to adopt clearer communication strategies, including simplified consent processes and transparent explanations about data collection, usage, and storage practices. Regular updates to beneficiaries about their data are essential for fostering trust.
3. Strengthen the cascade training model: to improve knowledge dissemination, it is recommended that organizations enhance the preparation of trainers through advanced "train-the-trainer" sessions and ongoing mentorship. Providing localized case studies and practical tools tailored to the Ukrainian context will further strengthen the training impact.
4. Empower affected communities in data governance: Collaborative Cash Delivery agencies may explore participatory approaches, such as involving beneficiaries in data governance frameworks. This could include community feedback mechanisms or joint decision-making on data protection practices.
5. Address operational barriers in data submission: humanitarian organizations may prioritize resolving procedural inefficiencies, such as introducing electronic queue systems and simplifying online application processes. Special attention should be given to supporting vulnerable groups, such as the elderly, through tailored assistance and digital literacy initiatives.

1. Introduction

Data protection and privacy are essential for ensuring that humanitarian responses respect the dignity and rights of disaster-affected communities. In the context of cash and voucher assistance (CVA) programs in Ukraine, the responsible handling of personal data is critical. Humanitarian organizations must not only comply with legal frameworks but also adopt practices that prioritize the safety and autonomy of beneficiaries. One of recent developments proving high importance of this field is the *Ukraine Information Sharing Protocol (ISP)*,¹ endorsed by the Humanitarian Country Team, provides a foundation for ethical and effective data management across the humanitarian response.

This research was organized by World Vision International (WVI) and Humanitarian Data Solutions (HDS), on behalf of the CCD, that jointly delivered a project to increase knowledge of Ukrainian partner NGOs and their beneficiaries on personal data protection. The research focuses on understanding how communities receiving CVA in Ukraine perceive and experience data protection. It explores their awareness of data rights, their concerns about privacy, and their level of trust in humanitarian organizations. Additionally, it evaluates the effectiveness of cascade training programs delivered to local NGOs to enhance their capacity for ethical data management. It aims to provide actionable recommendations to strengthen people-centred approaches in CVA programs. The research focuses on areas where Collaborative Cash Delivery (CCD) agencies and their partners are operational, specifically targeting communities receiving humanitarian support in Ukraine.

Building on insights from the 2023 study, *Balancing Aid and Privacy: Perceptions of Data Protection Policies for Cash Assistance in Ukraine*,² this report highlights the current state of data responsibility in humanitarian contexts. It identifies opportunities to empower beneficiaries by improving transparency and fostering trust in data governance systems.

This report is part of broader efforts to align humanitarian practices in Ukraine with global standards for data responsibility. By addressing both beneficiary perceptions and organizational practices, the project focuses on enhancing data protection systems for ensuring accountability and inclusiveness in humanitarian programs.

2. Methodology

The study employed a mixed-methods approach, combining quantitative data from a phone survey with qualitative insights from Key Informant Interviews (KIIs). This approach enabled a comprehensive understanding of beneficiaries' perceptions and challenges in data protection within CVA programs, ensuring a balance between numerical trends and contextual depth.

Data Collection Methods

A phone survey. The questionnaire for the phone survey was designed to replicate key questions from the 2023 study *Balancing Aid and Privacy*, enabling comparisons where possible. It was initially drafted in English and reviewed by WV and HDS teams for feedback. After revisions, the finalized questionnaire was translated into Ukrainian to ensure clarity and cultural appropriateness. Due to the refusal of humanitarian

¹ OCHA, 2023. Information Sharing Protocol Ukraine, 17 May 2023.

<https://reliefweb.int/report/ukraine/information-sharing-protocol-ukraine-17-may-2023-enuk>

² Ground Truth Solutions, 2023. Balancing aid and privacy: Perceptions of data protection policies for cash assistance in Ukraine. <https://www.groundtruthsolutions.org/library/balancingaidandprivacy>

organizations to share beneficiary contact information—demonstrating their adherence to data protection policies—52 respondents were identified through snowball sampling among personal acquaintances who had experience receiving CVA and were willing to participate. Enumerators received 1-day training focused on tool familiarization, handling sensitive topics, ethical considerations, and gender and conflict sensitivity, ensuring inclusive and respectful engagement with diverse groups. Rigorous quality assurance measures were implemented, including pilot testing, real-time supervision by senior researchers, regular debriefings, and daily data validation to maintain data accuracy and integrity.

The questionnaire used for the survey is included as Annex 1.

The survey gathered perspectives and experiences of respondents regarding data protection awareness, trust in humanitarian organizations, and data-sharing practices. All the 52 respondents were the recipients of CVA from various providers, since only such recipients were included in the survey. While the sample size is relatively small, the survey was strengthened by including seven open-ended questions, encouraging respondents to share their experiences, insights, and recommendations. This added qualitative depth to the quantitative component. Key demographic details include:

- Residence: 78.8 percent lived in urban areas, and 21.2 percent in rural areas.
- IDP Status: 63.5 percent were IDPs, and 36.5 percent non-IDPs.
- Age: 9.6 percent were aged 18-35, 46.2 percent aged 36-59, and 44.2 percent aged 60 or older.
- Sex: 86.5 percent were women, and 13.5 percent men.
- Education: 59.6 percent had higher education, 19.2 percent vocational, and 13.5 percent secondary education.

A **very important observation** is that despite contacting a total of different 12 humanitarian providers for beneficiary lists to be surveyed, including through friendly relations of the research team members, none shared contact details, citing adherence to personal data protection policies. This demonstrates the strength of these policies within the humanitarian sector at the organizational level.

Key Informant Interviews (KIIs). The KIIs were conducted with representatives from four Ukrainian NGOs that participated in the cascade training on data protection facilitated by HDS. These NGOs were selected based on their involvement in the training and their roles in disseminating the acquired knowledge within their teams and to beneficiaries. The NGOs included: Alliance for Public Health, Charitable Foundation “Realisation of Ideas,” Slavic Heart NGO, and Women’s Consortium of Ukraine. All four KII respondents were women. They manage humanitarian projects in their respective organisations.

The KIIs were facilitated by the evaluation team and conducted in Ukrainian to ensure clarity and cultural appropriateness for the participants. The interviews focused on understanding how effectively the knowledge from the training was retained and passed on, identifying the most and least successful elements of the training, and gathering recommendations for improving future training programs on data handling in Ukraine and potentially in other countries. The guide for KIIs is provided in Annex 2.

Analytical techniques. The study used triangulation to integrate data from the phone survey, KIIs, and insights from the 2023 “Balancing Aid and Privacy” survey. Quantitative data were analyzed for patterns and trends, while qualitative responses from open-ended questions and KIIs were coded thematically to capture key insights and experiences.

Ethical considerations. Ethical principles, including confidentiality and informed consent, guided the study. Respondents were informed of their rights and the purpose of the research. Conflict-sensitive practices ensured the dignity and comfort of participants in a humanitarian context.

Limitations and Mitigation

- Small sample size: While the phone survey had only 52 respondents, its qualitative component, with open-ended questions, provided rich insights.
- Snowball sampling: This method, while limiting generalizability, was necessary due to providers’ strict data protection policies.
- Data access: Humanitarian providers' refusal to share contact lists highlights the operational strength of their data governance systems.

These limitations were mitigated by complementing the quantitative data with qualitative input and referencing findings from the 2023 Balancing Aid and Privacy survey, ensuring a balanced and robust analysis.

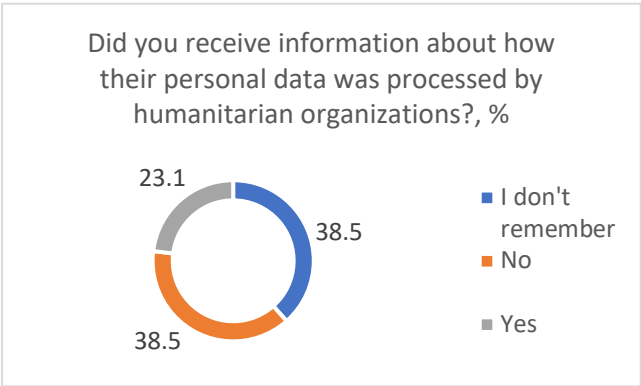
3. Findings

3.1. Understanding Beneficiary Perceptions and Challenges in Data Management

This section examines the perceptions, concerns, and experiences of beneficiaries regarding the management of their personal data within CVA programs around Ukraine. Key findings focus on beneficiaries’ awareness of data handling practices, trust in humanitarian organizations, and the challenges they face when submitting personal data. The analysis also explores reluctance to share sensitive information, factors influencing trust, and beneficiaries’ interest in further education on data protection. These findings are source for actionable recommendations for improving data collection, processing, and storage practices, highlighting the importance of transparency, accessibility, and professionalism in humanitarian operations suggested in the recommendations section below.

Data Awareness and Communication

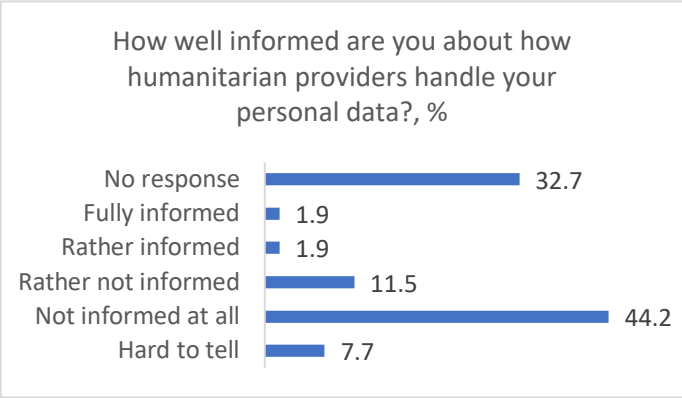
First, the study examined whether CVA recipients received information about how their personal data was processed by humanitarian organizations. Among 52 respondents, only 23.1 percent reported receiving such information. In contrast, 38.5 percent did not recall if they have received any, and another 38.5 percent stated they had not received any information. These findings may highlight a lack of consistent communication about data handling practices or a recall bias.



The study also explored the type and frequency of information received by CVA recipients regarding data use and their awareness of data processing policies. Only 12 persons who reported receiving this information (23.1 percent of total number of respondents, see above) answered this question. When asked about the specific information received on data use, respondents could select multiple answers. The most frequently mentioned details were

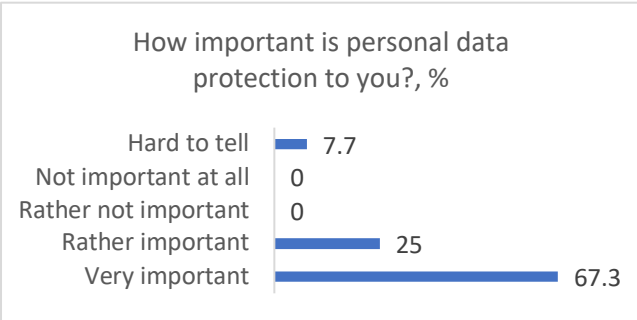
about who has access to their data and how it would be used (4 mentions each). Information on data storage was mentioned 3 times, while two respondents noted receiving general storage information. These responses highlight limited and inconsistent communication on data processing.

In terms of how frequently beneficiaries received information on data processing policies, only 34.6 percent of respondents (18 persons) provided answers. Of those, 33.3 percent mentioned receiving such information "very rarely," while another 33.3 percent reported "never." Only 5.6 percent said they received information "rather frequently," with no one indicating "very frequently." The high non-response rate (65.4 percent) underscores a significant gap in beneficiaries' engagement with data policies.



Awareness of how humanitarian organizations process data was another area of concern. Of the 52 respondents, 67.3 percent answered, with 65.7 percent reporting they were "not informed at all" and 17.1 percent "rather uninformed." Only 2.9 percent described themselves as "fully informed" or "rather informed." These findings reflect a significant lack of awareness among beneficiaries about how their data is handled.

When examining the types of personal data shared with humanitarian organizations, respondents could select multiple answers. The most commonly shared data included names (78.8 percent), identification codes (76.9 percent), and passport numbers (71.2 percent). Other frequently shared data included bank information (51.9 percent), date of birth (57.7 percent), and gender (46.2 percent). More sensitive data, such as health status (32.7 percent) and income level (30.8 percent), was less frequently shared. These findings indicate that a wide range of personal data is routinely collected by humanitarian organizations.



The importance of data protection when applying for assistance was another key finding. A majority



of respondents (67.3 percent) rated data protection as "very important," and 25 percent rated it as "rather important." For 7.7 percent, it was hard to tell. No respondents considered data protection "rather unimportant" or "completely unimportant," showing a strong consensus on the value of safeguarding personal data.

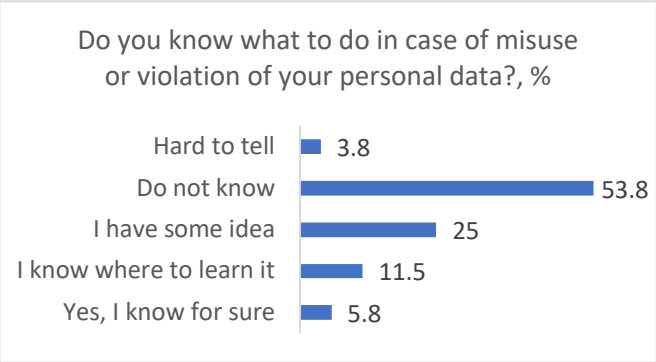
Finally, regarding knowledge of their data rights under Ukrainian law,³ 48.1 percent of respondents reported

³ The Law of Ukraine "On Personal Data Protection," <https://zakon.rada.gov.ua/laws/show/2297-17#Text>, and other related legal acts.

being aware of their rights, while 44.2 percent were not. A smaller proportion (7.7 percent) found it difficult to answer. These findings reveal a near-equal split in beneficiaries' understanding of their legal data rights, indicating room for further education and awareness-raising efforts.

Data Protection Practices

The study also examined beneficiaries' knowledge of actions to take in cases of data misuse and their personal efforts to protect their data when applying for cash assistance. A majority (53.8 percent) of respondents reported not knowing what to do if their data was misused. About 25 percent had "some idea" of the steps to take, and 11.5 percent knew where to find this information. Only 5.8 percent were confident about the necessary actions. These findings highlight the need for clearer guidelines and broader dissemination of actionable steps for beneficiaries.



When asked about their own data protection practices (an open-ended question), most respondents reported taking specific measures to safeguard their personal data. A recurring strategy was not sharing sensitive financial details, such as PIN codes, bank account numbers, or card information. Many also avoided providing original documents, opting instead for copies, with some even marking or crossing out their copies for added security. However, neither of the respondents reported that they had been told by any humanitarian organisation to use such practices – instead, they decided to take such measures on their own.

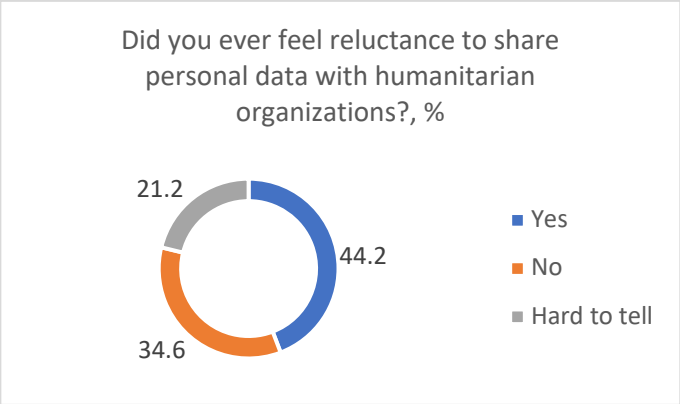
Some respondents were cautious about verifying the organizations they interacted with, as one mentioned, *"Everything depends on the organization's reputation, but I never share original personal documents."* A few individuals reported checking all the information on forms before signing and carefully reviewing how their data would be used. One respondent stated, *"I carefully familiarize myself with where, how, and when my data will be used."*

However, a notable portion of respondents admitted to not taking any proactive protection measures, with answers like *"Nothing"* or *"I don't do anything."* Others relied on external assistance, such as family members, to navigate the process. For instance, one respondent shared, *"I am an elderly person, so my daughter helps me everywhere."*

These responses reveal a mix of proactive and passive data protection behaviors, with significant gaps in awareness or capacity among groups with lower education levels and rural residents, highlighting the need for targeted education and support.

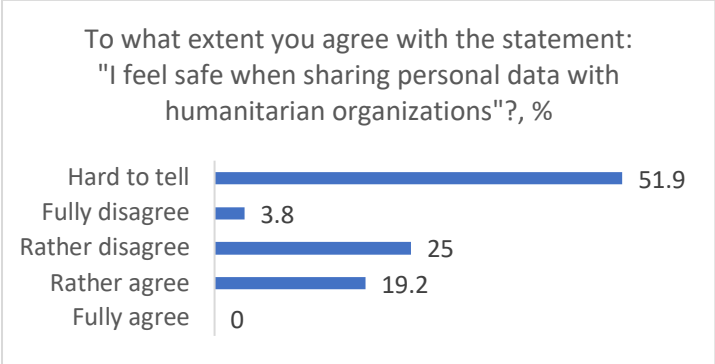
Reluctance and Concerns About Data Sharing

The analysis revealed significant concerns regarding the provision of personal data to humanitarian organizations. Reluctance to share personal data was notable, with 44.2 percent of respondents expressing hesitation, compared to 34.6 percent who reported no reluctance. About 21.2 percent found it difficult to answer, suggesting lingering uncertainty among some beneficiaries. This reflects considerable concerns about data sharing within the humanitarian context.

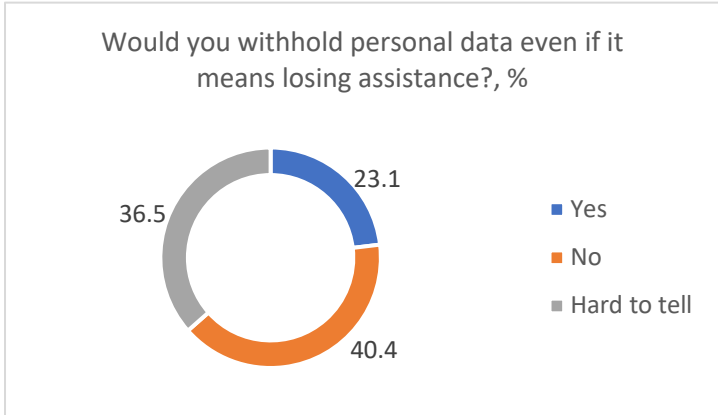


Concerns when providing personal data were dominated by fears of data falling into the hands of fraudsters, mentioned by 88.5 percent of respondents. Other concerns included improper use of data or its use for unintended purposes (34.6 percent), and a lack of knowledge about how the data would be used (28.8 percent). Concerns about confidentiality breaches (25 percent) and uncertainty over when data would be deleted (25 percent) were also prevalent. Only 1.9 percent worried about data being shared with third parties, indicating that specific fears, such as fraud or misuse, outweigh more general concerns.

Regarding safety in providing personal data, only 19.2 percent of respondents "rather agreed" that they felt safe when sharing their data. Meanwhile, 25 percent "rather disagreed," and 3.8 percent "fully disagreed." A majority of 51.9 percent found it difficult to answer, signalling widespread uncertainty and mistrust among beneficiaries about the safety of their personal information.



When considering whether beneficiaries would withhold data even if it meant losing assistance, 23.1 percent stated they would withhold specific data, while 40.4 percent were willing to provide the necessary data, and 36.5 percent were unsure.

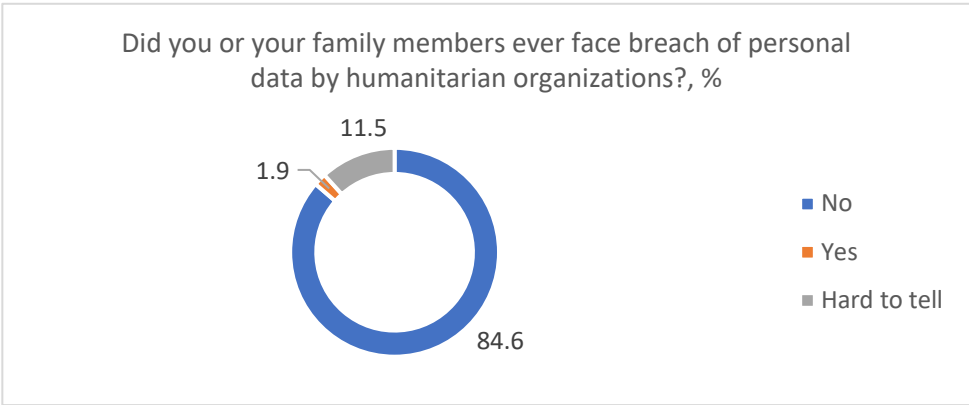


When asked an open-ended question on what types of data the respondents did not want to share the most, it was revealed that financial information was the most sensitive category respondents were reluctant to share, including income levels, bank account details, and PIN codes. Other sensitive data included income and health information, banking history, and access to cards. Personal details such as civil status or passport numbers were also mentioned.

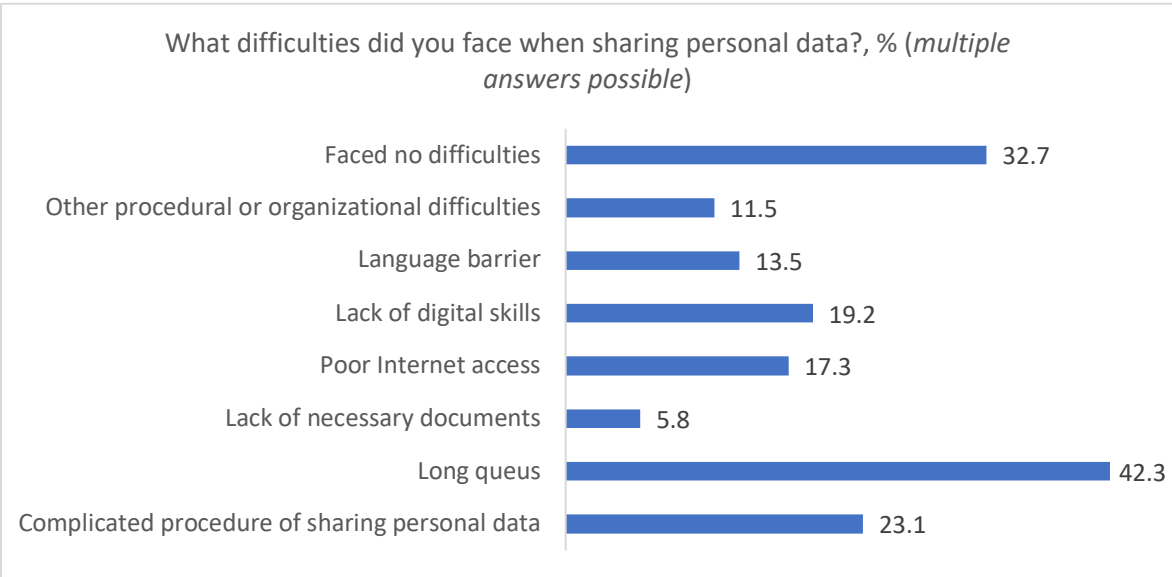
These findings suggest that privacy concerns often outweigh the perceived necessity of aid for a segment of beneficiaries.

Data Breaches and Submission Challenges

The study also examined beneficiaries' experiences with data breaches and the challenges encountered during the data submission process. Regarding experiences of data breaches by humanitarian organizations, 86.3 percent of respondents reported no such experiences. Only 1.9 percent mentioned personal incidents involving data breaches, while 11.8 percent found it difficult to answer. These findings suggest that while data breaches are not a widespread concern, individual cases could still influence perceptions of data security and trust in humanitarian organizations.



When exploring difficulties in submitting personal data, respondents could select multiple answers. The most commonly reported issue was long queues, mentioned by 42.3 percent, highlighting a significant logistical challenge in the data submission process. Complexity of procedures was the next most cited difficulty, affecting 23.1 percent of respondents. Digital access barriers were also notable, with 19.2 percent reporting a lack of digital skills, including an inability to use the Internet, and 17.3 percent identifying poor Internet access as a problem. Language barriers affected 13.5 percent of respondents, and 5.8 percent faced challenges due to missing necessary documents. Additionally, 11.5 percent mentioned other specific procedural or organizational difficulties.



However, it is worth noting that 32.7 percent of respondents reported no difficulties during the data submission process, indicating that for a significant portion, the process was relatively smooth. Despite this, the prevalence of challenges such as long queues, complex procedures, and digital access limitations highlights the need for targeted improvements to streamline the process and ensure accessibility for all beneficiaries.

Trust and Factors Influencing Trust

Trust in humanitarian organizations regarding data handling was low. Only 3.8 percent of respondents reported "fully trusting" humanitarian organizations, while 19.2 percent "somewhat trusted" them. Conversely, 11.5 percent "somewhat distrusted" these organizations, and a substantial 63.5 percent found it difficult to answer. Another 2024 research proves that only 55 percent Ukrainians trust in non-profit organizations, including those providing humanitarian assistance, down from 78 percent in 2022.⁴ This highlights a critical gap in trust and the need for greater transparency and trust-building measures. A related critical issue remains the lack of transparency in the distribution of humanitarian aid. For example, according to the 2023 survey on the perspectives and experience of receiving humanitarian assistance, people in Ukraine report insufficient information about the conditions of humanitarian funding and express a desire to know which regions the aid is directed to and who qualifies to receive it. Notably, three-quarters of respondents did not know how to provide feedback or file complaints about the quality of aid received, and only 7 percent managed to do so.⁵

Finally, factors influencing trust in humanitarian organizations were assessed. The most significant factor was the organization's reputation, mentioned by 53.8 percent of respondents. Previous experiences with the organization were also critical, noted by 42.3 percent. Awareness of how data is used (25 percent) and official registration status (28.8 percent) were less significant but notable. Media representation (5.8 percent) and recommendations from others (21.2 percent) had minimal influence. These findings emphasize the importance of building strong reputations and fostering positive experiences to establish trust with beneficiaries.

⁴ The Razumkov Centre. Assessment of Citizens' Perception of the Situation in the Country and Government Actions. Trust in Social Institutions, Politicians, Officials, and Public Figures (January 2024), <https://razumkov.org.ua/napriamky/sotsiologichni-doslidzhennia/otsinka-gromadianamy-sytuatsii-v-kraini-ta-dii-vlady-dovira-do-sotsialnykh-institutiv-politykiv-posadovtsiv-ta-gromadskykh-diiachiv-sichen-2024r>

⁵ Ground Truth Solutions, Kyiv International Institute of Sociology. Over a Half of Humanitarian Aid Recipients in Ukraine Require Additional Support – A Survey. 2023, <https://galka.if.ua/ponad-polovyna-liudey-iaki-otrymuvaly-humanitarnu-dopomohu-v-ukraini-potrebuieut-dodatkovoi-pidtrymky-doslidzhennia/>



Perceived Bias and Vulnerabilities

The issue of potential bias from humanitarian organizations during the application process for cash assistance revealed mixed responses. When asked an open-ended question if beneficiaries had observed any biased attitudes toward different social groups, most respondents reported no such observations. However, some highlighted specific instances of perceived discrimination. These included arbitrary rules and the rejection of valid documents, which made the process more challenging for applicants. As one respondent described, *"They often invent non-existent rules and reject valid documents, which makes it harder for us."*

Technical barriers emerged as another source of perceived inequality, particularly for vulnerable groups like the elderly. Online application systems, in particular, posed significant challenges. One beneficiary explained, *"It was hard to apply online due to technical problems, which was unfair for older people."* These technical issues highlight the need for more accessible systems that cater to diverse needs and capabilities of the target populations.

Organizational processes, such as queue management and communication, were also identified as areas requiring improvement to promote fairness. One respondent emphasized, *"Queues need better management, and there should be clear communication from administrators."* These insights suggest that operational inefficiencies can inadvertently contribute to perceptions of bias.

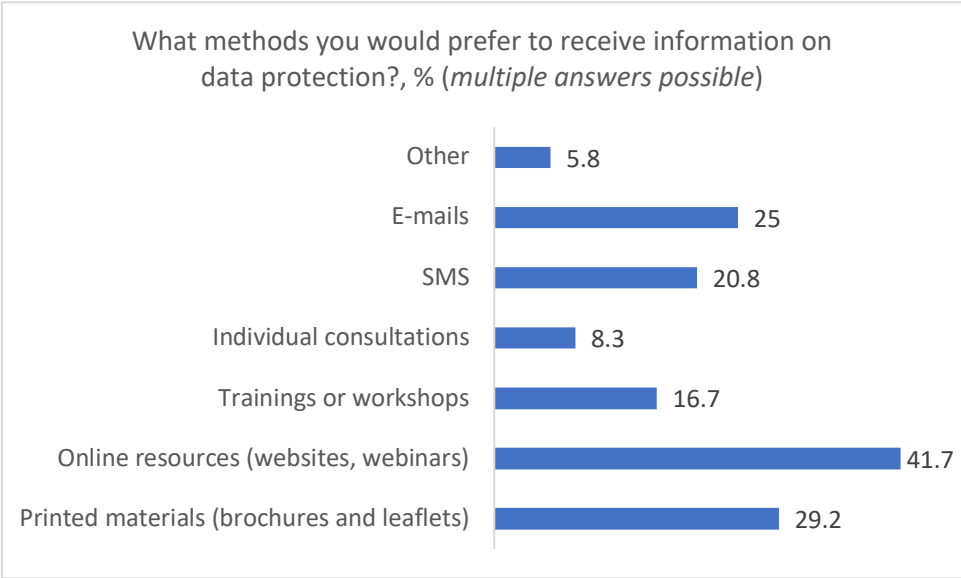
Instances of unprofessional behavior were also reported, with staff attitudes contributing to feelings of inequality. As one beneficiary noted, *"Staff at the local TsNAP [Administrative Service Center] were rude and unwelcoming."* While widespread bias was not observed, these individual cases of perceived unfairness underscore the importance of improving professionalism, transparency, and accessibility in humanitarian aid delivery to ensure inclusivity and equity for all beneficiaries.

Interest in Data Protection Education

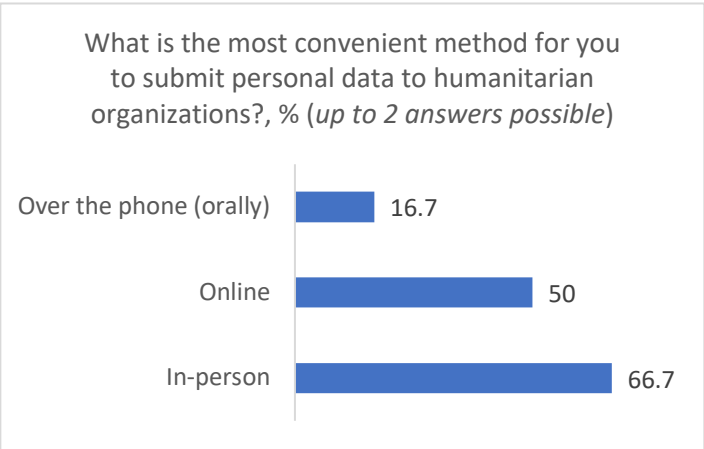
The analysis revealed a split in beneficiaries' interest in further education on data protection. When asked about their desire for additional information on data protection, 46.2 percent of respondents expressed

interest in learning more. Meanwhile, 40.4 percent did not feel the need for additional information, and 13.5 percent found it difficult to answer. There is a direct correlation who report not having received information of data protection from humanitarian organisations and those who expressed no interest in learning additional information. These results indicate varying levels of engagement and awareness among beneficiaries, highlighting the importance of tailored approaches to educational outreach on data protection.

Regarding preferred methods for receiving information on data protection, respondents were able to select multiple options. The most popular choice was online resources, such as websites and webinars, preferred by 41.7 percent. Printed materials, including brochures and leaflets, were selected by 29.2 percent, while 25 percent preferred email communication. SMS messages were a choice for 20.8 percent, and 16.7 percent of respondents opted for trainings or seminars. Individual consultations were the least popular, chosen by only 8.3 percent. Additionally, some respondents suggested other methods, such as communication via Viber, WhatsApp, or local village leaders, which were mentioned by 5.8 percent. These findings underscore the effectiveness of digital communication channels for disseminating information while acknowledging the continued relevance of traditional methods for approximately one third of beneficiaries.



When considering the most convenient methods for submitting personal data to humanitarian organizations, respondents highlighted in-person interactions as the most trusted and preferred option, with 66.7 percent selecting this method. Online submission, including websites, online forms, and mobile applications, was preferred by 50 percent of respondents, mostly by younger population and urban residents. Submitting data over the phone was considered convenient by only 16.7 percent. These results suggest that while digital options are gaining traction, many beneficiaries still rely on and trust face-to-face interactions for sensitive processes like data submission.



Improving Data Management Processes

Respondents of the surveys were also asked open-ended questions about potential improvements in the collection, processing, or storage of personal data by humanitarian organizations. Responses revealed several key areas for enhancement. Many beneficiaries emphasized the need for better data security and confidentiality. One respondent stated, *"It's important to better safeguard the data and provide explanations about why it is being collected."* Transparency and professionalism from humanitarian staff were also common themes, with calls for clearer communication during the assistance process.

Technical issues posed a significant challenge, with beneficiaries urging organizations to improve internet access and simplify online application processes. Older beneficiaries, in particular, struggled with the complexities of digital systems, as one noted, *"They need to simplify online applications because not everyone understands how to use them, especially older people."* The lack of an electronic queuing system was also a recurring complaint, with reports of long waits and conflicts during application processes. As one beneficiary explained, *"Queues are long, people argue, and there's no organization in the process. An electronic queue system would help."*

Beneficiaries further suggested targeted outreach, such as mobile teams visiting remote areas, and support mechanisms tailored to elderly beneficiaries. The repeated need to submit the same documents across multiple applications was another major issue. One respondent proposed, *"Each time [we apply for aid], we provide the same documents. Maybe it's time to create a database."* These diverse but actionable recommendations underscore the importance of addressing logistical, technical, and interpersonal challenges to improve beneficiaries' experiences with humanitarian organizations.

Demographic Insights on Personal Data Perceptions and Behaviours

Age. The analysis reveals notable age-related differences in perceptions and behaviours regarding personal data handling by humanitarian organizations. Younger individuals (18-35) are less likely to report receiving information about how their data is processed compared to middle-age (36-60) and seniors (60+), highlighting a potential gap in communication strategies targeting this group. When it comes to the

importance of data protection, younger respondents place the highest emphasis on it, with 80 percent rating it as "very important," compared to 79.2 percent of middle-aged and only 52.2 percent of older respondents. At the same time, younger individuals also demonstrate the greatest reluctance to share data, with 60 percent expressing hesitation, compared to 58.3 percent in the middle-aged group and just 26.1 percent in the older group. This reflects heightened privacy concerns among younger demographics, likely influenced by greater digital awareness.

Trust in humanitarian organizations varies significantly, with younger respondents (18-35) expressing slightly higher levels of trust compared to older groups, but a majority across all ages remain uncertain or distrustful. Interest in further education on data protection is overwhelmingly high among younger beneficiaries (100 percent), while older groups show less enthusiasm, reflecting a potential need for tailored educational approaches. Addressing these disparities through age-specific communication and digital literacy support could improve trust and engagement across all age groups.

Sex. The analysis of responses disaggregated by sex reveals notable differences in perceptions and behaviours regarding personal data handling. Women also exhibited a higher awareness of their data protection rights under Ukrainian law (51.1 percent) than men (28.6 percent). Interestingly, while both groups predominantly felt uninformed about how their data was processed, women were slightly more likely to feel informed (6.4 percent versus 0 percent).

Men displayed higher reluctance to engage with additional information on data protection, with 57.1 percent expressing disinterest compared to 37.8 percent of women. Women, on the other hand, expressed a greater willingness to withhold specific data, even at the cost of losing aid (26.7 percent compared to 0 percent for men). These findings underscore the importance of tailoring communication strategies to address distinct gendered concerns, particularly men's lower engagement with data protection awareness and women's heightened concern about privacy and trust in humanitarian organizations.

IDP status. The analysis of survey responses by displacement status (IDPs vs. non-IDPs) highlights subtle differences in data awareness and trust. Internally displaced persons (IDPs) were slightly more informed about their data rights under Ukrainian law (57.6 percent) compared to non-IDPs (31.6 percent). However, IDPs reported a slightly higher reluctance to share personal data due to concerns about privacy (51.5 percent) compared to non-IDPs (31.6 percent). Interestingly, both groups showed similar low levels of feeling informed about data handling, with over 65 percent of respondents in both categories expressing that they were "not informed."

Despite these concerns, IDPs were somewhat more likely to express interest in receiving additional information about data protection (51.5 percent vs. 36.8 percent of non-IDPs). Trust levels in humanitarian organizations' data security practices remained generally low, with over 70 percent of both IDPs and non-IDPs responding with "unsure" or "do not trust." These findings suggest the need for targeted communication strategies that emphasize transparency and trust-building, especially for IDPs who face unique vulnerabilities and heightened privacy concerns.

3.2. Cascade Training Evaluation

The cascade training program offered by HDS has proven to be a pivotal initiative in raising awareness and enhancing the practical application of personal data protection principles among humanitarian organizations operating in Ukraine. Key findings from the evaluation highlight significant achievements, and areas for further refinement to maximize the program's potential.

Increased Awareness and Practical Skills

The training has notably elevated participants' understanding of personal data protection. Feedback indicates that most participants left with a stronger grasp of both the legal requirements and the ethical imperatives tied to safeguarding sensitive data. This shift was underpinned by a human-centred approach emphasized throughout the sessions. According to a KII respondent, *"The training was an eye-opener. We realized that while we followed the laws on paper, we didn't think enough about the people behind the data."* This statement reflects a broader trend among participants, many of whom acknowledged the importance of treating data not merely as a regulatory issue but as a means to protect the dignity and uphold the trust of beneficiaries.

Furthermore, the training provided concrete, actionable steps for compliance with the Ukrainian and international legal frameworks for data protection. Tools such as data-sharing templates, consent forms, and protocols for handling sensitive information were particularly appreciated. One respondent noted that their organization had already begun implementing revised procedures following the training, such as securing clearer beneficiary consent when collecting or sharing data.

Effectiveness of the Cascade Model

The cascade training model, designed to empower participants to pass on their knowledge to colleagues, was generally well-received. This approach enabled organizations to expand the reach of training without requiring significant additional resources. However, its success varied depending on the trainers' ability to engage and effectively communicate with their teams. Some respondents noted that the model worked exceptionally well in organizations with strong internal communication structures. One participant remarked, *"Our team embraced the cascade model because it allowed us to train dozens of staff members quickly, ensuring the entire office was on the same page about data security."*

Nonetheless, there were challenges. In several cases, participants who lacked facilitation experience struggled to deliver effective training to their peers. Some organizations supplemented these gaps by inviting external consultants to lead follow-up sessions or by sharing recorded training materials, but the need for better trainer preparation remains a key lesson learned.

Practical Applications and Tailored Support

One of the most appreciated aspects of the program was its emphasis on practical applications tailored to participants' unique operational contexts. Many organizations noted the usefulness of real-world examples, which helped them bridge the gap between theory and practice. For instance, during the individual consultations provided as part of the training, several participants adapted data protection materials to their specific needs. As one respondent noted, *"The individual consultations were incredibly valuable because they addressed our unique challenges. For instance, we were able to adapt posters and materials specifically for our beneficiaries."*

Additionally, the focus on practical problem-solving enabled participants to address ongoing challenges, such as ensuring secure storage of data, clarifying data-sharing agreements with third parties, and providing beneficiaries with clearer explanations of how their information would be used. The availability of tailored support during and after the training was repeatedly cited as a highlight.

Cascade trainings, planned for January-February 2025, are expected to be concise (one hour) and primarily online. These sessions will target project staff and partner organizations before new projects are launched. All partners confirmed that they have already disseminated training insights among their peers, and two

out of four interviewed organizations intend to revise their standard operating procedures to incorporate personal data protection measures. Participants strongly supported the idea of recurring cascade trainings, recommending that they will be conducted either semi-annually or at the start of every new project.

Challenges and Areas for Improvement

Despite the training's many strengths, several challenges were identified. A recurring issue was the lack of localized content. While the training included comprehensive materials, participants from Ukraine often found international examples less relatable. As a result, many requested case studies drawn from the Ukrainian humanitarian context, which they felt would resonate more with local challenges and solutions.

Another significant challenge was the uneven application of the cascade model. While the approach was effective in organizations with experienced trainers, some participants lacked the confidence or expertise to cascade knowledge effectively. This led to a dilution of the training's impact in some cases. Suggestions for improvement included more advanced train-the-trainer sessions and follow-up mentorship to ensure quality and consistency in knowledge transfer.

Broader Influence

The cascade training program contributed to broader cultural shifts within organizations. Participants noted improved communication with beneficiaries about how their data is used and protected. This increase in transparency was seen as a crucial step toward building trust in humanitarian organizations, particularly in a context where beneficiaries often feel vulnerable regarding their personal information. One respondent shared, *"These trainings shouldn't be a one-time event. We need them regularly—perhaps at the start of every project or every six months—to keep everyone updated and aware."*

Moreover, the training was credited with encouraging organizations to integrate data protection into their operational strategies. Some organizations reported establishing new internal policies, while others had begun allocating specific resources to ensure compliance and improve beneficiary trust.

4. Analysis and Discussion

4.1. Analysis of Dynamics and Insights from 2023 and 2024 Surveys

The 2023 and 2024 surveys provide valuable insights into personal data protection perceptions and practices within the context of humanitarian assistance. While the methodologies differ significantly, careful interpretation allows us to explore potential trends and dynamics over time. The 2023 survey utilized a robust random sampling method with over 1,000 respondents, offering a representative snapshot of opinions. In contrast, the 2024 survey involved only 52 respondents, identified through a snowball sampling method, which is less representative but offers depth in specific areas. Additionally, variations in the questions asked across the two surveys further limit direct comparisons. This analysis focuses on identifying overarching themes, potential shifts in perceptions, and key insights rather than drawing direct parallels or statistical comparisons.

Perceptions of Transparency in Data Handling

A prominent theme across both surveys is the lack of perceived transparency regarding how personal data is handled by humanitarian organizations. In 2023, a significant proportion of respondents reported feeling uninformed about how their data was being processed. This sentiment persisted in the 2024 survey, with

over two-thirds of participants expressing similar concerns. Although the smaller sample size in 2024 prevents robust generalization, the consistency of this issue suggests it remains a critical challenge for humanitarian organizations. This indicates a broader systemic issue rather than one tied to specific demographic or operational contexts.

Interestingly, the 2024 survey offers a glimpse into how misunderstanding or miscommunication around data collection processes can exacerbate this perception. Anecdotal evidence suggests instances where respondents misinterpreted standard data collection questions as irrelevant or intrusive. This points to a potential gap in how data collection practices are communicated to beneficiaries, which may contribute to the persistent perception of a lack of transparency.

Trust in Humanitarian Organizations

Trust in the ability of humanitarian organizations to securely handle personal data emerged as a key theme in both surveys. In 2023, trust levels were already moderate to low, with a notable proportion of respondents expressing uncertainty or scepticism about data security practices. The 2024 survey reflects a similar pattern, with many respondents indicating they feel unsure or distrustful of how their data is managed. While the smaller sample size and different sampling method in 2024 may amplify this trend, the continued lack of trust is a critical insight that appears consistent over time.

Notably, trust seems closely tied to perceptions of transparency. In both surveys, respondents who felt well-informed about data handling practices were more likely to trust humanitarian organizations. This suggests that efforts to improve transparency and communication around data protection could have a positive impact on trust levels.

Awareness of Data Rights

The surveys also shed light on beneficiaries' awareness of their data rights under Ukrainian law. In the 2023 survey, a majority of respondents demonstrated limited awareness of their rights, reflecting a broader issue of low digital and data literacy. The 2024 survey suggests a slight increase in awareness among certain groups, such as internally displaced persons (IDPs) and women, although overall awareness levels remain relatively low. This indicates that while there may be localized improvements in awareness, broader efforts to educate beneficiaries about their rights are still needed.

Hesitation and Reluctance to Share Data

A notable dynamic across both surveys is the hesitation among beneficiaries to share personal data with humanitarian organizations. In 2023, a significant proportion of respondents expressed reluctance to provide data, citing concerns about privacy and misuse. This trend appears to have intensified in the 2024 survey, where a majority of younger respondents and IDPs reported hesitancy to share data. This could reflect a growing awareness of privacy risks, potentially influenced by increased digital literacy or exposure to data-related issues.

The 2024 survey also highlights specific types of data that beneficiaries are particularly hesitant to share, such as sensitive demographic or health-related information. This aligns with findings from 2023, where respondents expressed greater discomfort with sharing data they perceived as highly personal or unrelated to their immediate needs.

Interest in Further Education

Both surveys underscore a strong interest among beneficiaries in receiving more information about personal data protection. In 2023, respondents expressed a desire for clearer communication and educational initiatives to help them understand how their data is collected, used, and protected. This sentiment is echoed in the 2024 survey, where younger respondents, in particular, showed overwhelming interest in learning more about data protection. This suggests a potential area for engagement, as beneficiaries are willing to participate in educational initiatives that could enhance their trust and confidence in humanitarian organizations.

Emerging Themes and Contextual Factors

The 2024 survey introduces new contextual insights not explicitly addressed in the 2023 survey. For instance, the role of digital literacy and awareness in shaping perceptions of data protection has become more apparent. Younger respondents and IDPs, who are likely more exposed to digital platforms, demonstrate higher levels of concern about data privacy. This highlights the influence of broader societal trends, such as increasing digitization, on beneficiaries' expectations and behaviors.

Additionally, the smaller sample size and snowball sampling method in 2024 allowed for a more focused exploration of individual experiences and perceptions. For example, specific anecdotal evidence from the 2024 survey provide a richer understanding of how miscommunication during data collection can impact beneficiaries' trust and willingness to share information.

4.2. Integration of Findings from Surveys and KIIs to Identify Key Trends

The integration of data from the 2023 and 2024 surveys, alongside insights from key informant interviews (KIIs), reveals a persistent challenge in humanitarian data practices: the gap between organizational improvements and beneficiary perceptions. Across both years, beneficiaries expressed consistent concerns about the transparency of data handling processes, with over two-thirds of respondents in the 2024 survey reporting that they felt uninformed about how their data was managed. The KIIs emphasized that even when organizations followed robust data protection protocols, this was rarely communicated effectively to beneficiaries. As a result, the operational improvements made internally often failed to translate into increased beneficiary trust.

A striking trend emerging from the findings is the growing awareness and hesitation among beneficiaries, particularly younger individuals and IDPs, about sharing personal data. While privacy concerns are a well-documented issue, the 2024 survey suggests that these concerns are intensifying. This dynamic could be influenced by the broader societal shift towards greater digital awareness, as beneficiaries become more conscious of the potential risks associated with data breaches or misuse. At the same time, anecdotal evidence from the KIIs highlights how instances of miscommunication or insensitive data collection practices exacerbate this hesitation. These factors collectively underscore the critical role of communication and transparency in addressing beneficiary concerns.

Another important insight is the role of cascade training in shaping organizational practices and staff awareness of data protection. The KIIs revealed that the trainings not only improved technical knowledge but also fostered a cultural shift within organizations, encouraging staff to view data protection through an ethical lens. However, the findings also highlight inconsistencies in the dissemination of this knowledge, with some organizations struggling to cascade the training effectively. This disparity underscores the importance of understanding how internal practices influence external perceptions and addressing the gaps that hinder meaningful beneficiary engagement.

4.3. Implications of Perceptions and Training Outcomes for Future Data Governance in CVA Programs

The findings illuminate critical implications for data governance within CVA programs and the broader humanitarian sector. First, the persistent suboptimal levels of trust in humanitarian organizations' data handling practices, observed in both the surveys and KIIs, point to a systemic issue. Trust is not only an outcome of strong data protection policies but also a reflection of beneficiaries' perceptions of transparency, engagement, and respect. While organizations have made efforts in improving internal compliance, the data reveals that this has not significantly shifted beneficiary trust levels, with many respondents remaining uncertain or distrustful.

Second, the cascade training model has proven to be a powerful tool for enhancing internal capacity in data governance. The KIIs indicate that participants gained practical skills and a deeper appreciation for the ethical dimensions of data protection. This has resulted in some organizations adopting better practices, such as securing clearer consent or revising data-sharing agreements. However, the variability in how effectively this training was cascaded highlights a key challenge: the scalability of knowledge transfer. Organizations that succeeded in fully internalizing the training often had stronger internal communication mechanisms, while others faced barriers such as inexperienced facilitators or a lack of follow-up support. These variations have implications for the sustainability of training outcomes and their ability to impact beneficiary experiences meaningfully.

The findings also emphasize the growing complexity of beneficiaries' concerns regarding data governance. The 2024 survey revealed that beneficiaries are increasingly attuned to the risks of data misuse, particularly with sensitive information like financial or health-related data. While this reflects a positive shift in awareness, it also underscores the pressure on organizations to anticipate and address these concerns proactively. KIIs highlighted instances where beneficiaries' perceptions of insensitivity or inadequate communication undermined their willingness to share data. This dynamic points to the evolving expectations beneficiaries have of humanitarian organizations and the critical need for these organizations to adapt accordingly.

Special Story Box: Communication and Perception Challenges in Personal Data Collection

Although rare, certain incidents during personal data collection can significantly jeopardize the relationship between beneficiaries and humanitarian providers, impacting trust and perceptions of data handling practices. The following story highlights the importance of clear communication and sensitivity when collecting personal data:

One respondent of a telephone survey complained that when a CVA provider collected personal data from her, she was asked if she was breastfeeding. This question was posed after she shared her age (60+) and mentioned that she was a pensioner. The respondent found this interaction puzzling and inappropriate.

This story illustrates a key challenge in personal data collection—how questions about data are perceived versus their actual intent. Upon consultation with the MEAL team of the concerned organization, it turns out the question asked was: *“Do you have anyone in your family/household who is currently breastfeeding?”* This is a legitimate and relevant question, often necessary for tailoring assistance programs to household needs. Simplifying or omitting such questions would compromise the quality of the data collected and its relevance for program design.

However, this situation also emphasizes that data collection is not just about obtaining accurate information; it is about ensuring that beneficiaries feel respected and understood throughout the process. Misunderstandings, particularly around sensitive or personal data, can lead beneficiaries to perceive the interaction as inappropriate or dismissive, even when the question is justified. This can erode trust in humanitarian providers and discourage beneficiaries from sharing critical personal data in the future.

Recommendation: Humanitarian providers should prioritize clear and context-sensitive communication during personal data collection. Questions should be framed transparently, with brief explanations provided where necessary to clarify the relevance of the information being requested. Data collectors must also be trained to handle sensitive topics respectfully and ensure that beneficiaries understand why personal data is being collected and how it will be used. By improving communication and fostering understanding, humanitarian organizations can maintain beneficiary trust and ensure that data collection is both effective and respectful.

4.4. Shifting Data Ownership Towards Affected Communities

The findings strongly indicate the need to reconsider how data ownership is conceptualized within humanitarian operations. Currently, beneficiaries often perceive themselves as passive participants in data collection processes, which fuels mistrust and a sense of vulnerability. This perception is reflected in the 2024 survey, where a significant proportion of respondents expressed hesitation in sharing their data, fearing misuse or fraud. The KIIs further reinforced this sentiment, with participants emphasizing that beneficiaries often feel disconnected from how their data is used or managed.

Shifting data ownership towards affected communities could help bridge this gap. While the findings do not suggest that beneficiaries are opposed to data collection per se, they highlight a desire for greater control and visibility over how their information is used. This aligns with the broader trend of increasing digital awareness among beneficiaries, particularly younger individuals and IDPs. By creating systems that allow beneficiaries to access and manage their data, humanitarian organizations could address these concerns and foster a sense of agency. The KIIs also pointed to the importance of involving beneficiaries in decision-making processes related to data governance, noting that such inclusion could enhance trust and engagement.

4.5. Importance for CCD Agencies to Prioritize People-Centred Data Practices

The findings underscore the necessity for CCD agencies to place beneficiaries at the heart of their data practices. Beneficiary perceptions of data handling are deeply intertwined with their broader trust in humanitarian organizations. The 2024 survey reveals that trust is not only influenced by technical measures like data security but also by how beneficiaries feel they are treated during the data collection process. This was echoed in the KIIs, where respondents frequently mentioned the importance of respectful and transparent communication.

People-centred data practices involve more than just ensuring compliance with legal frameworks; they require a cultural shift towards treating beneficiaries as active stakeholders. The KIIs highlighted how even small actions, such as clearly explaining the purpose of data collection or using culturally sensitive language, can significantly impact beneficiary perceptions. By prioritizing empathy and transparency, CCD agencies can create data governance models that not only protect personal information but also strengthen relationships with the communities they serve.

5. Conclusion

The report provides a comprehensive analysis of beneficiaries' perceptions, experiences, and understanding of data rights within cash and voucher assistance (CVA) programs in Ukraine, as well as the capacity of humanitarian organizations to manage data ethically and effectively. The findings reveal critical gaps in data protection practices, communication, and trust, underscoring the need for systemic improvements in data governance.

A significant portion of beneficiaries feel uninformed about how their personal data is processed, with only 23.1 percent reporting they received any information about data handling practices. Trust in humanitarian organizations to handle personal data securely is notably low, with only 3.8 percent of respondents expressing full trust. This lack of awareness and trust highlights the importance of transparency and clear communication to bridge the gap between organizational efforts and beneficiary perceptions. Additionally, privacy concerns remain prevalent, with financial and health data identified as the most sensitive types of information beneficiaries are reluctant to share.

The report also highlights operational challenges, such as procedural inefficiencies, long queues, and digital barriers, which disproportionately affect vulnerable groups, including the elderly and rural residents. Addressing these challenges through tailored assistance and streamlined processes is essential for improving beneficiary experiences.

The cascade training program, facilitated by HDS, has shown promise in enhancing the capacity of humanitarian organizations to adopt better data protection practices. Participants reported improved knowledge of legal and ethical data handling requirements, and some organizations have already implemented clearer beneficiary consent processes. However, the effectiveness of the cascade model varied, with challenges in knowledge dissemination and a lack of localized content noted by participants. These findings emphasize the need for advanced train-the-trainer sessions, tailored support, and ongoing mentorship to ensure consistent knowledge transfer across organizations.

A recurring theme throughout the analysis is the growing interest among beneficiaries in learning about personal data protection. Younger respondents, in particular, expressed strong enthusiasm for further education, signaling an opportunity for humanitarian organizations to engage communities through targeted outreach and educational campaigns. This aligns with broader efforts to empower beneficiaries and foster trust by adopting participatory approaches to data governance.

The findings also underscore the importance of shifting data ownership toward affected communities. By involving beneficiaries in decision-making processes and creating systems that allow them to access and manage their personal data, humanitarian organizations can foster a sense of agency and trust. This approach aligns with global best practices for ethical data management, which prioritize the dignity, safety, and autonomy of individuals.

6. Recommendations

6.1. Strengthening Beneficiary Awareness of Data Rights and Practices

6.1.1. Enhancing transparency in data collection processes

- Humanitarian organizations should develop/continue using standardized, plain-language communication materials (*e.g.*, brochures, posters, videos) to explain how personal data is collected, stored, and used. These materials should be made available in both digital and print formats and tailored to the literacy levels of beneficiaries.
- Field staff are recommended to receive training to effectively explain data handling practices to beneficiaries during registration or interactions.
- Donor agencies are advised to request that funded organizations report on efforts to improve transparency in data practices as part of their monitoring, evaluation and learning (MEL) processes.

6.1.2. Expanding educational outreach on data rights and protection

- Humanitarian organizations are advised to collaborate with local NGOs and community-based organizations to deliver practical workshops on personal data rights under Ukrainian law.
- CCD agencies should launch digital literacy campaigns, focusing on personal data protection through popular platforms like social media and messaging apps, making sure the campaigns are tailored to the target population demographics.
- Governmental bodies are advised to develop an online portal to centralize resources on data protection for beneficiaries.

6.1.3. Addressing beneficiary concerns through tailored communication

- Program managers should introduce short beneficiary feedback surveys to identify specific concerns about data sharing and address them promptly.
- Field teams are recommended to focus on providing clear explanations about why particular types of data are collected and what safeguards are in place.
- Humanitarian organizations should organize regular Q&A sessions at community hubs or online to build trust and transparency.

6.2. Building Trust in Humanitarian Organizations

6.2.1. Improving organizational transparency and accountability

- Humanitarian organizations are recommended to publish simple, accessible reports on their data governance practices, summarizing how beneficiary data is managed and safeguarded.
- Program managers are advised to implement clear data-sharing agreements with partners and sharing these agreements with beneficiaries, to prevent beneficiaries from completing similar forms multiple times.

6.2.2. Strengthening feedback mechanisms for beneficiaries

- Humanitarian organizations should continue operation of accessible feedback channels (*e.g.*, hotlines, online forms) for beneficiaries to report data-related concerns.
- Field offices could establish beneficiary advisory committees to discuss and address community grievances, ensuring a platform for ongoing dialogue and consultation.

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- Humanitarian organizations should integrate regular community consultations and participatory decision-making processes into their accountability frameworks, enabling beneficiaries to contribute to program design, implementation, and evaluation.
- Donors are advised to include comprehensive humanitarian accountability systems, encompassing feedback mechanisms, community participation, and consultations, as part of funding performance criteria

6.2.3. Capacity building for field staff

- Humanitarian organizations are encouraged to integrate data protection modules into existing staff training programs.
- Program coordinators should conduct periodic assessments of staff adherence to data protection practices, with refresher sessions as needed.
- Organizations implementing cascade training should ensure that staff selected for ToT roles possess strong facilitation skills or include facilitation skill development in their capacity-building plans to prepare them for the ToT program.
- Donors are advised to fund tailored capacity-building initiatives for local staff to strengthen their knowledge of data governance.

6.3. Enhancing Data Governance in Humanitarian Organizations

6.3.1. Integrating localized data protection practices

- Local partners should co-develop data governance frameworks to ensure these practices reflect operational realities.
- CCD agencies are recommended to establish working groups with humanitarian actors to develop unified data handling standards.
- Humanitarian organizations are recommended to align internal policies with these standards to ensure consistency.
- Donors should make adherence to these standards part of their funding requirements.

6.3.2. Conducting regular audits and compliance checks

- Humanitarian organizations should conduct regular internal reviews of their data practices.
- Independent auditors are advised to verify compliance with Ukrainian and international frameworks.
- Donors are advised to allocate funding to support these audits.
- Findings of these audits and checks should be shared with the target communities to build trust.

6.4. Empowering Affected Communities Through Data Ownership

6.4.1. Establishing community-led data governance models

- Humanitarian organizations should involve beneficiary representatives in discussions about data governance policies to ensure their perspectives are considered.
- Community leaders should be mobilized to act as advocates for data protection within their communities.
- Local NGOs are advised to facilitate forums where beneficiaries can co-create data guidelines with organizations.

6.4.2. Ensuring participatory approaches in data policy development

- CCD agencies should establish advisory groups that include beneficiaries, NGOs, and data protection experts to provide ongoing feedback.
- Humanitarian organizations are advised to use participatory methods, such as focus groups, when designing data collection processes.

6.5. Prioritizing People-Centred Data Practices in CCD Agencies

6.5.1. Embedding beneficiary-centred principles in operations

- CCD agencies should continue and expand a “do no harm” framework for data management, prioritizing beneficiaries' safety and dignity in every decision.
- Humanitarian organizations are recommended to include beneficiary feedback metrics, such as perceived safety and trust, in program planning, implementation and evaluations.

6.5.2. Leveraging technology for improved access and security

- CCD agencies should invest in secure, user-friendly digital platforms for data collection, ensuring accessibility for all beneficiaries, and in provision of training for beneficiaries to be able to navigate the platform.
- Donors are advised to fund projects that focus on advancing secure and accessible digital systems.

Annexes

Annex 1. Questionnaire for phone-based survey of beneficiaries in targeted communities

Data Protection and Data Rights Qualitative Research of Communities receiving Cash & Voucher Assistance – Ukraine

Introduction

Greeting: *"Hello, my name is [Name], and I'm calling on behalf of [Organization]. You were a beneficiary of a cash assistance program, and we received your contacts from the provider of this assistance. Now we are conducting a survey to understand how beneficiaries of cash and voucher assistance programs in Ukraine perceive data protection and their data rights. Your participation is voluntary, and your responses will be kept anonymous. We do not collect your name for this survey. We will keep the data received from you only to draft the report. After we give the report to World Vision, we will delete all the data from our servers."*

Confirmation: *"May I proceed with the survey?"*

Consent: *"Do you consent to participate?"*

Section 1: Demographic Information

1. What is your age?

- 18-35
- 36-59
- 60+

2. What is your gender?

- Male
- Female
- Other/Prefer not to say

3. Are you currently an internally displaced person (IDP)?

- Yes
- No

4. What is your highest level of education?

- Secondary or lower

- Vocational
- Incomplete higher
- Higher education

5. What type of settlement do you live in?

- Urban
- Rural

6. Have you applied for cash assistance in the past twelve months?

- Yes
- No

7. Did you receive cash assistance after applying?

- Yes
- No

Section 2: Awareness of Data Privacy

8. Have you received any information from the cash provider about how your personal data is handled?

- Yes
- No
- I don't remember

9. What type of information did you receive? (Multiple answers possible)

- How my data will be stored
- Who will have access to my data
- How long my data will be retained
- How my data will be used
- How I can access my data
- Other (please specify)

10. How often do you receive updates from cash providers about their data handling policies?

- Always

- Often
- Rarely
- Never
- I do not know

11. To what extent do you feel informed about how your data is handled by cash providers?

- I feel fully informed
- I feel somewhat informed
- Neither informed nor not informed
- I feel rather uninformed
- I don't feel informed at all

12. Do you know your rights regarding personal data under Ukrainian law?

- Yes
- No
- Not sure

13. Do you know what steps to take or who to contact in cases of misuse or violations of personal data?

- Yes, I know exactly what to do
- I have some idea
- No, I don't know

Section 3: Perceptions and Concerns

14. How important is personal data protection to you when applying for cash assistance?

- Very important
- Somewhat important
- Hard to say
- Not very important
- Not at all important

15. Do you feel comfortable sharing your personal data with NGO cash assistance providers?

- Very comfortable
- Somewhat comfortable
- Neither comfortable nor uncomfortable

- Somewhat uncomfortable
- Very uncomfortable

16. Have you ever been reluctant to share personal data while applying for assistance?

- Yes
- No
- Hard to say

17. What are your main concerns when sharing personal data? (Multiple answers possible)

- Misuse of data
- Data falling into the hands of fraudsters
- Breach of confidentiality
- Data being used for purposes other than intended
- I don't know how it is being used
- I don't know when it is deleted
- Other (please specify)

18. To what extent do you agree with the following statement: "I feel safe sharing my personal data with cash assistance providers"?

- Fully agree
- Rather agree
- Neither agree nor disagree Rather disagree
- Fully disagree

Section 4: Trust and Risk Mitigation

19. How much do you trust cash and voucher assistance providers to handle your data ethically and securely?

- Fully trust
- Somewhat trust
- Neither trust nor distrust
- Somewhat distrust
- Fully distrust

20. What factors influence your trust in cash providers? (Multiple answers possible)

- Provider's reputation

- Transparency in data use
- State registration
- Recommendations from others
- Previous experience/relationship with the provider
- Other (please specify)

21. What steps, if any, do you take to protect your data when applying for cash assistance? (Open-ended; enumerator records response)

Section 5: Experience with Data Sharing

22. What types of personal data did you share when applying for cash assistance? (Multiple answers possible)

- Passport details
- Tax ID
- Banking information
- Date of Birth
- Name
- Gender
- Contact details
- Residence information
- Other (please specify)

23. Which types of data do you feel are too sensitive to share? (Open-ended; enumerator records response)

24. Have you experienced any challenges or barriers while sharing your data? (Multiple answers possible)

- Long queues
- Difficulty with digital applications
- Language barriers
- Lack of required documents
- Other (please specify)

25. Have you or anyone you know (e.g., friends or relatives) experienced misuse or violations of personal data by cash assistance providers or others?

- Yes, I experienced it personally

- Yes, someone I know
- No
- Not sure
- Prefer not to answer

26. If you or someone you know experienced a misuse or violation of personal data, how did you or they react? Was the problem resolved? (Open-ended; enumerator records response)

Section 6: Communication and Suggestions

27. Would you like to receive more information about personal data, how to protect it, and how to address potential violations?

- Yes
- No
- Not sure

28. If yes, what methods of receiving this information would you prefer? (Multiple answers possible)

- Printed materials (e.g., brochures, leaflets)
- Online resources (e.g., websites, webinars)
- Training sessions or workshops
- One-on-one consultations
- SMS or email updates
- Other (please specify)

29. What additional information about data handling would you like to receive? (Open-ended; enumerator records response)

30. How would you prefer to share personal data with cash providers? (Multiple answers possible)

- In person
- By phone
- Online forms
- Mobile applications
- Other (please specify)

31. What do you think cash providers could improve in how they handle, collect, or store your personal data? (Open-ended; enumerator records response)

Section 7: Vulnerability and Group-Specific Concerns

32. Have you observed any differences in how different social groups (e.g., older persons, younger people, people with disabilities, women) are treated by cash providers when it comes to data collection? (Open-ended; enumerator records response)

Closing

Thank the respondent: "Thank you very much for your time and insights. Your feedback will help improve how organizations manage data protection in cash and voucher assistance programs."

Offer contact details for further inquiries.

Annex 2. Qualitative Data Collection Tool – KII guide

Data Protection and Data Rights Qualitative Research of Communities receiving Cash & Voucher Assistance – Ukraine

Date:	
Location:	
Interviewee:	

Introduction:

- 1) Turn on Tape Recorder
- 2) Welcome

Thanks for agreeing to be part of the KII/focus group. I appreciate your willingness to participate.

- 3) Introduction

Introduce myself, and send the Sign-In Sheet around to the group while you are introducing the KII/focus group.

My name is Mykhailo Koriukalov/Kateryna Stolyarenko. We are a team of independent evaluation consultants and were invited by the WVI to undertake the Data Protection and Data Rights Qualitative Research of Communities receiving Cash & Voucher Assistance -Ukraine. The aim of this review is not just evaluation but also learning. By understanding how beneficiaries perceive data protection and privacy, the project seeks to shift ownership over personal data from humanitarian agencies to affected people. This will allow a more people-centred approach in the collection, management, sharing, and portability of personal data in CVA programs, while ensuring system interoperability and the safe management of this data. The finding of this research will be used for informing WVI future training programs on data handling in Ukraine and potentially in other countries, enabling replication of effective practices.

- 4) Explanation of the process

About the purpose of the focus group

We gathered today in order to discuss your experience in participation of WVI cascade training on data management practices that was provided to you as local trainers. We need your input and want you to share your honest and open thoughts with us.

Logistics

- Focus group will last up to 1.5 hours
- Feel free to move around
- Where is the bathroom? Exit?
- Security: What do we do in case of air raid alert?

- 5) Ground Rules

- *We would like everyone to participate. All person's experiences and opinions are important. Speak up whether you agree or disagree. We want to hear a wide range of opinions.*

- *The information you give me is completely confidential, and I will not associate your name with anything you say in the KII/focus group.*
- *We would like to tape the focus groups so that we can make sure to capture the thoughts, opinions, and ideas we hear from the group. No names will be attached to the focus groups and the tapes will be destroyed as soon as they are transcribed.*
- *You may refuse to answer any question or withdraw from the study anytime.*
- *We understand how important it is that this information is kept private and confidential. We will ask participants to respect each other's confidentiality.*

6) Ask the group if there are any questions before we get started, and address those questions.

7) Introductions

- Go around table: name, jobs title, where are you from

Discussion begins, make sure to give people time to think before answering the questions and don't move too quickly. Use the probes to make sure that all issues are addressed, but move on when you feel you are starting to hear repetitive information.

Questions

1	Let's start the discussion by talking about the training course on personal data handling in which you participated under the CCD project starting from August 2024. How did the participation in this course correspond to your expectations? Please provide examples.	
2	How would you rate the quality of the training program and expertise of course tutors on a 5-rating scale, where 5 is the highest and 1 is the lowest? Why did you choose this rating?	
3	What are some of the positive aspects of attending this course? What did you like the most?	
4	What knowledge have been gained by you? How practical do you find the knowledge and skills learned?	
5	What could be better about the training course?	
6	What are your plans in terms of cascading the knowledge and skills (promoting the skills and knowledge among your colleagues and beneficiaries)? How exactly you are going to implement it? What support would you need for that?	

7	In your opinion, what can be the barriers and enablers to the popularization of knowledge on personal data protection among beneficiaries?	
8	What improvements would you make to this training in the future?	
9	Should this cascade training be offered regularly? If so, how often? Who are the best audience?	
10	Do you have anything to add on this topic?	

After the brief oral summary the question asked is: "Is this an adequate summary?"

That concludes our focus group. Thank you so much for coming and sharing your thoughts and opinions with us.

Materials and supplies for KII

- KII/FGD Guide for Facilitator
- 1 recording device
- Batteries for recording device
- Notebook for note-taking