



DESIGN PROCESS REPORT

CCD Data Governance Pilot Ukraine

A DESIGN REPORT FOR THE CCD NETWORK
Prepared by Paul Currion

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

www.collaborativecash.org

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INTRODUCTION:

Disclaimer

This is a design document and not a research document. The analysis included is not exhaustive, as it is only intended to provide context for the design decisions. Any factual errors in the note reflect the limitations of the design process, rather than the contributions of the

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participants in that process. The recommendations that it makes are provisional and do not represent commitments by the CCD or any of its members. The solution proposed in the design note is intended as a starting point for the CCD to test new models of governance in the course of addressing a specific problem. In this document we discuss the problem of referrals in Ukraine.

Design Process

Following research carried out by CCD in 2022, a consultant was engaged to develop the design process. The process began with separate webinars delivered to CCD members in South Sudan and Ukraine, followed by Q&A sessions. Following the webinars, a series of design sessions were held remotely with each country, engaging with a group of staff proposed by CCD members. At the same time key informant interviews were carried out to investigate specific issues related to the operating environment, particularly legal and technical. This pilot design note was synthesised from all this information.

We approach the question of data portability by taking a clearly defined concrete challenge faced by aid organisations (deduplication in South Sudan and referrals in Ukraine), and addressing it through an approach which improves accessibility and participation (data stewardship). Once this approach has been proven to work in pilot, it should form a solid foundation for data portability, since there will be a) the technical basis to move data between organisations, b) participatory mechanisms to ensure that the aid recipients' interests are taken into account, and c) greater understanding among aid recipients (and organisations) about their interests regarding how their data is used.

Definitions

In order to ensure clarity of the different terms used in the design process, we have developed a separate Glossary (Appendix A) which sets out definitions of key terms and sources for those definitions. Here we expand only on the critical term of Referral.

Referral

The design process originally began with the intention to focus on the use case of protection referral, which “involves an assessment of the person’s Protection need, which.. must be conducted by a well-trained technical specialist in Protection.” Both design process facilitators and participants believed that protection referral is too sensitive and complicated for a pilot, requiring much more negotiation particularly around data protection measures.

Protection actors also distinguish between referral - which involves “at least two humanitarian staff getting in contact with each other, and transferring the contact details of a person in need of a service” - with counselling,¹ which the Inter-Agency Minimum Standards on Referrals for Ukraine define as “[p]roviding information on services, or giving the hotline number of an organization, to a person in need of a service, without connecting to another humanitarian staff”.

In order to avoid confusion, for the purposes of this document we will therefore use the definition of referral set out in the Inter-Agency Minimum Standards, originally developed for Lebanon, and adapted and published for Ukraine on 27 May 2022:

“A referral is the process of directing an individual or a household to another service provider because they require further action to meet an identified need, which is beyond the expertise or scope of the current service provider.”

¹ In addition Protection actors use the concept of re-direction, which is “a transfer of the person’s basic information: their name, location and phone number... to technical specialists in Protection”. Re-direction does not require any assessment of protection needs, or the transfer of any information other than basic contact details, and should be done by phone rather than by using the Inter-Agency Referral Form.

BACKGROUND

An August 2022 CALP report on Ukraine recommended that “Humanitarian organizations currently using online self-registration platforms... should develop a common self-registration platform and centralized referral system”,² pointing out that the current system was inefficient and unaccountable, and did not lead to balancing of the caseload across actors and locations. The report outlined what would be needed to achieve this approach:

“significant coordination backed-up by MoUs, Data Sharing Agreements (DSA) between agencies and with the government authorities as well as data sharing legislation such as GDPR rules and regulations, and referral implementation standard operating procedures (SoPs).”

By June 2023 this had not been achieved. Referrals continue to be treated as an “optional extra” rather than a core component of humanitarian programming; almost never included in project budgets and planning, it is not prioritised and remains under-resourced, with little sign of a common approach. This results in inefficient use of data by humanitarian organisations, and unacceptable waste of time for aid recipients; for example, if an NGO collects data for 1000 households and selects 200 for MPCA, there are 800 households who have given their time and data and who may be eligible for non-cash assistance - but who may never receive any further information and may fall through the gaps.

There has been some progress, with CCD members reporting at least 3 NGO consortia that are setting up referral systems between their members. These referral systems are limited in both scope and size, and do not address the global referrals challenge described by the CALP report. Given the persistent need for improved referral systems, this is an opportunity to build on these efforts to develop and test new collective approaches to referrals which might be replicable and scalable.

² *Registration, Targeting and Deduplication: Emergency Response inside Ukraine (2022)*, CALP Network.

Ukraine is potentially a good choice for such a pilot. It has high levels of mobile phone penetration and internet usage, and aid organisations have been able to stand up e.g. online registration platforms and communications via messaging apps that would have been more difficult in other responses. However there is still a significant digital divide particularly between rural / urban and older / younger populations. There are also concerns about issues which are not specifically humanitarian but should have an impact on how humanitarian organisations handle data, including sensitivity around sharing data of conscription-age men with the government, and more general worries about online scams.

Constraints

1 **Ukraine has a comprehensive legal and regulatory**

environment concerning use of data, with the direction of travel towards EU GDPR compliance. Anecdotal reports from participants are that the government is especially sensitive after being sued by Ukrainian citizens over data-related issues, and does not believe that the current situation removes their related obligations. This has created greater concerns around data sharing than in other locations, leading to e.g. more rigorous consent processes.

2 **The operating environment in Ukraine** poses difficulties for any system. It is dynamic, with the potential for the situation on the ground to change quickly; and sensitive, with specific political issues arising from the war, such as who should be considered the legitimate authority in contested areas. While Ukraine's state capacity is a net positive, it reduces the political space for setting up a pilot.

3 **Coordination structures in Ukraine are complicated.** A large number of humanitarian organisations are on the ground, leading to a wide range of coordination and consortium bodies in place which have widely differing efficiencies. This creates a more challenging environment for setting up a pilot, making it difficult to build consensus and ensure that no conflicts with existing systems arise inadvertently.

Stakeholders

This section provides an overview of stakeholder groups. Recommendations for stakeholder engagement are provided in the Layer Design section.

Communities


The focus of our design is the group of primary stakeholders in any information system - those who provide the data which makes the system useful in the first place, in this case the individuals, households and communities of Ukraine. The pilot should attempt to incorporate their perspective at all points during the project cycle.

International and National NGOs

CCD members are already working with each other, and with non-CCD members in other working groups, within Ukraine and in neighbouring countries. The research identified 4 consortia that were developing or implementing referral systems:

Table 1: Existing and planned referral consortia

Name	Members
Joint Emergency Response Ukraine (JERU)	Welthungerhilfe (lead) Concern Worldwide CESVI + local NGO partners
Ukraine Response Consortium	ACTED (lead) CARE Germany World Vision International Right To Protection IMPACT (ERC joining Sep/Oct)
Ukraine Cash Consortium	Norwegian Refugee Council People In Need Mercy Corps
Dorijka Consortium	Action Contre la Faim, Solidarités International, Triangle Génération Humanitaire, Humanité & Inclusion, Première Urgence Internationale



These consortia are built on bilateral trust between the members. Such trust is considered by participants to be essential to even get initial agreement on the joint planning. It is unlikely that the pilot will be able to generate this trust on its own within the project timeframe.

United Nations Agencies

According to the [Ukraine 2023 Cash Overview](#), MPCA is dominated by two UN agencies: WFP (1,139,129 people assisted with USD 92,915,085) and UNHCR (231,967 people assisted with USD 42,273,000). (UNICEF, IOM and the Ukrainian Red Cross Society make up the top 5 organisations in terms of scale.) Despite (or perhaps because of) this dominance, the UN has not been able to establish an inclusive referral system, which is why CCD identified it as a potential use case. However UN agencies are taking the lead in discussions around social protection with the Ukrainian government, and are also involved in maintaining referral mechanisms for e.g. child protection.

Government Institutions

The Government of Ukraine has maintained substantial capacity throughout the war, which has influenced the policies and activities of humanitarian organisations. Discussions began in 2022 about how humanitarian assistance would transition to state-supported social protection, and are likely to move forward during 2023 under the Perehlyd Initiative. Even if there is a successful transition within a reasonable timeframe, there will continue to be outstanding humanitarian needs which international and (more likely) national NGOs will be required to address. In particular individuals and households may fall through gaps in state provision, or require specialised support which the state cannot provide.

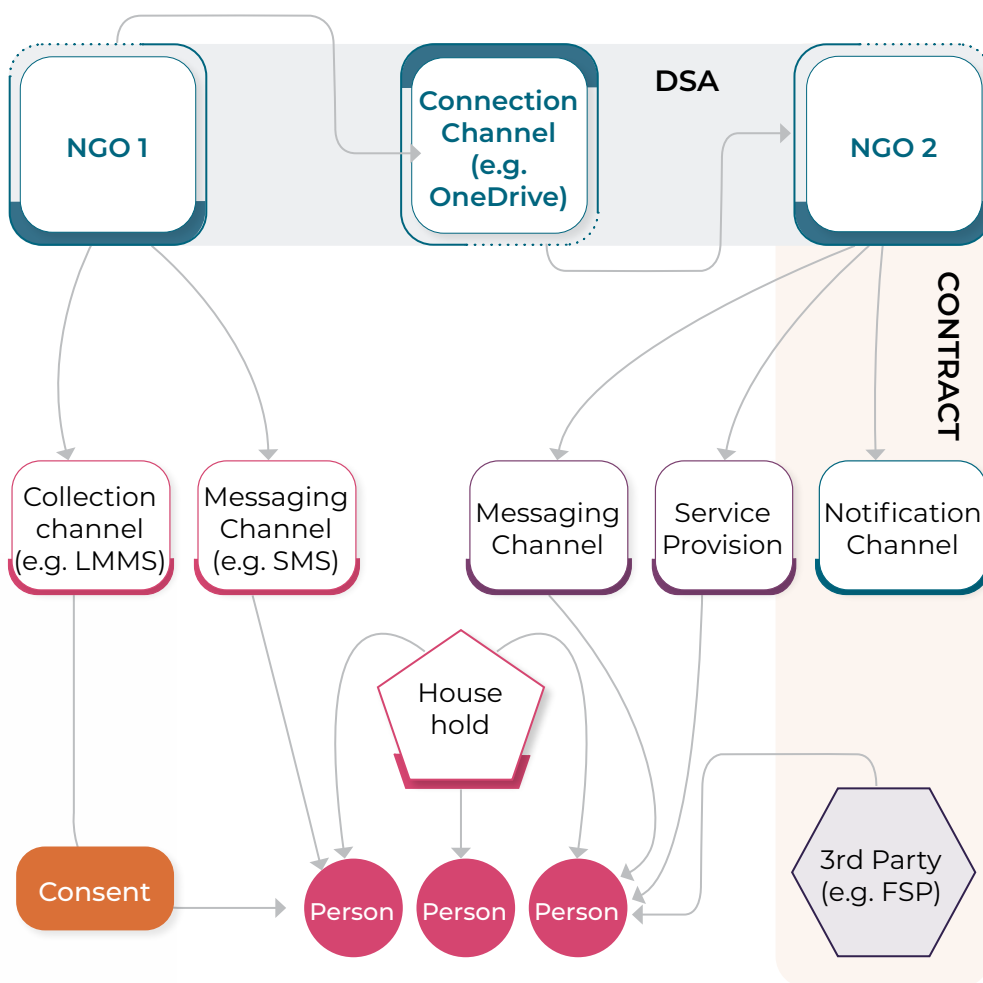
Private Sector

All participating organisations were using third-party software and hardware platforms provided by private companies. These platforms provide a variety of functions related to both registration and delivery; these functions overlap but the capabilities of each platform are not identical, and the platforms themselves are not interoperable. It is unlikely that any of these platforms will be able to facilitate a referral system, and their corporate structures do not lend themselves to a stewardship approach.

Process

In the design sessions and interviews, we talked with representatives of the 3 NGO consortia that we learned were setting up referral processes: Joint Emergency Response Ukraine (JERU), the Ukraine Response Consortium, and the Ukraine Cash Consortium. From these interviews we developed a generic flowchart that describes the referral pathway plus additional related processes. All three consortia follow a similar flow, with the primary difference between them being the actors involved and the platforms used.

Diagram 1: Generic referral workflow



DESIGN PRINCIPLES



The design sessions were partly organised around nine design principles relevant to data governance, grouped into three categories of three principles each. These principles are shown in Table 2 below, and full definitions of the principles are given for reference in Appendix 1. We have used these principles to structure the design of the pilot.

Table 2: Key Design Principles for Data Governance

Data Protection	Democratisation	Localisation
Security	Accountability	Localisation
Privacy	Accessibility	Sovereignty
Transparency	Participation	Sustainability

These principles are not binary, but all exist on a spectrum - for example, we can be more or less accountable, or more or less transparent. There may be tensions between different principles - the most secure system is the least accessible system, for example - and the process of design is partly about managing these tensions.

Data Protection

Participants in the design sessions were more sensitive towards data protection issues than in most humanitarian responses, due to Ukraine's strict regulatory environment. There are also concerns specific to the operational environment around areas such as e.g. men eligible for conscription who may wish for their data not to be shared with the government. There is also the question of how to handle data collected or related to areas which are currently outside the control of, or have recently been re-occupied by, the Ukrainian government.

Two issues were raised by participants for particular attention:

1 Consent. Participants stated that blanket consent is not possible under Ukrainian law, and that the public policy and consent forms for a referral mechanism must specify by name the organisations which will be receiving the referral. Adding a new referral partner would therefore require going back to the affected individual and asking for extension of consent to that new partner, which has the potential to be difficult and costly in a large scale cash distribution. Before launching the pilot team will need to clarify the nature of informed consent in Ukraine in discussion with data protection officers in the pilot NGOs. It seems unlikely that there is no workaround to this challenge - either a legal one in the wording of the consent, or a technical one which could make it easier to go back to individual recipients for the extension of consent via e.g. a messaging channel. If the pilot works with an existing consortium whose consent forms cover all their members, this will be a less pressing issue.

2 Data Sharing. There was a consensus that data sharing agreements take too long to negotiate, particularly when UN agencies are involved. Any data sharing agreement required for the pilot - or more likely an extension of existing data sharing agreements - will need to be based on the specific needs of the referral process itself. This will require the participating organisations to agree what is the minimum data required to make a referral, and describe an ad hoc data standard defining field names and formats on which to base the pilot. Existing data sharing agreements can then be extended (even if only on a temporary basis) to cover the pilot, rather than trying to develop new agreements. The pilot and any platform it develops will provide at minimum the same level of data protection as the participating organisations.

Democratisation

Accessibility

The accessibility of our systems is critical for empowering aid recipients. This project's origins in discussions around data portability reflects this; data portability is assumed to increase the autonomy available to aid recipients by enabling them to control their own data and to transfer their data between organisations. Although aid recipients at present do not make many requests concerning the data which humanitarian NGOs hold, this is changing, reflected in reports we heard from Ukraine of individuals requesting that NGOs delete their personal data.

When aid recipients are unable to see inside our “black box” systems, they often lack information that would enable them to make better-informed choices, or at least to know whether and when help is coming to them. Design participants reported receiving many requests from potential recipients for clarification about whether they have been accepted for a specific programme; a range of channels are used by NGOs for communication, including email, messaging apps (such as WhatsApp and Viber) and (in particular) call centres which can be expensive to maintain and face their own challenges.

Digital platforms raise their own issues of accessibility which the pilot will need to address. As humanitarian processes become more digital, they increase the chance of exclusion for already marginal communities with less digital literacy. The humanitarian community operates in its own lingua franca which creates an additional language barrier for offline communities to access online services.

Accessibility is also foundational for accountability. Unable to see inside the “black box”, aid recipients have no way of knowing whether we are meeting or breaching our commitments to them, and therefore no basis for holding us accountable. Such insight - however limited - is a necessary first step towards accountability, which means that the technical design of systems is critical. One approach that the humanitarian community has experimented with focuses on enabling aid recipients to create “wallets” in which their data is held. The pilot will take a different approach which focuses on “accounts” that are made possible by the data steward model. The two models are summarised in Table 3, below.

Table 3: Two Models of Accessibility

	Wallet Model	Account Model
Who's responsible for the data?	The Aid Recipient (AR)	The data steward (DS)
Where is the data stored?	On device held by AR	On platform managed by DS
How is the data shared?	AR allows NGO access to their wallet	DS allows NGO access to AR account

Under the Account model, individual NGOs would still hold their own referral data. A referral platform provided by the Data Steward would aggregate that data in order to provide the referral service. Data relating to individual Aid Recipients would be held in individual "Accounts" which would be matched to the AR initial registration number - provided by the NGO, and known to the AR. If they have the capability and the interest to do so, ARs would be able to access their accounts to know which NGOs are holding data on them, and (if possible) where they are in the referral process,

There is an option to take this further, giving the AR permission control over their Account. Permission would initially be set to share with NGO partners based on the consent given when the data was collected. However the AR could be able to access their Account, and be enabled to change those permissions if they wished. The Data Steward platform would then notify the NGO who had contributed that data of the AR's wishes.

Regardless of the final design of the pilot, accessibility implies that we promote awareness not just of the process or system being used - including ongoing information about where community data is being stored and how it is being used - but also of their basic rights around accessibility, including which of the four options listed above are available. This outreach design could also raise awareness of what services with what criteria are available on referral.

Accountability

Accountability means that CCD members can be held to account by aid recipients, and a critical goal for the pilot is to move our organisations towards more accountability.

Legal accountability

In many locations the legal accountability of humanitarian NGOs is weak because state capacity is weak. Given the political and social context of Ukraine, however, Ukrainian citizens' expectations are likely to be that any accountability should concern the state in its role as duty-bearer. We are currently validating this and other assumptions through a community survey which can inform the pilot.

While all CCD members have data protection policies, the pilot will also require a legal framework which reflects the collective nature of the governance structure of any data steward mechanism, and collective monitoring through the governance body. Members will need to be held to account for any breach of responsibility, but this might prove to be an obstacle that prevents organisations from joining the project, and it may be better to delay this until after an initial pilot succeeds.

The details of this will be developed in the first phase of the pilot with the support of an external consultant. As well as the internal governance aspects, the consultant will take account of the regulatory requirements in Ukraine to ensure that the data steward mechanism is compliant and the legal accountability is clear.

Service quality

Accountability should not just refer to legal accountability, but also accountability regarding the quality of service being provided. At present most referral systems in the humanitarian sector rely on interpersonal trust or a history of organisations working together, since there is no central body that is able to validate service quality at the national level. However service coverage and quality can vary widely between organisations and locations, creating liability concerns.

This variation may have little to do with the commitment or professionalism of the organisation - for example, the funding may simply run out for a particular service - but this still has the potential to damage the trust relationship which leads the individual to trust the organisation with their data. Referrals require a level of quality assurance to be certain that the receiving organisation can provide the requested service to a sufficient quality, and avenues by which the individual can address any concerns about that service.

This requires that individuals are aware of the service and avenues, and so information is key to this type of accountability. The general consensus from participants was that humanitarian actors are not consistently providing adequate information to affected communities, and that existing channels are not well understood. This was backed up by survey work at the end of 2022 revealed that “Three quarters of people surveyed do not know how to ask a question, provide feedback, or make a complaint about aid and services, and only a few (7%) had done so at the time of data collection.”³

This could potentially be addressed by a more accessible system that enables users to view their own data in an account which they can access remotely. This could also help to address a challenge currently faced by call centres, which is how to verify the identity of a caller; call centre staff cannot have access to an individual’s personal information, but without that information they struggle to verify caller identity. An account-based system could provide a verification mechanism, either through remote authentication or direct access.

The Ukrainian government’s DIIA platform enables citizens to hold key documents (such as driving licenses) in a digital form on a smartphone, and CCD members have been reviewing whether this has the potential to be integrated into their own identity verification processes in some way. However we have not yet ascertained exactly what data needs to be uploaded to DIIA to activate it, and there are questions about both the coverage and security of the platform which would need to be answered before organisations are comfortable using it.

³ *Call for communication, collaboration, and cash: Perceptions of aid in Ukraine (2023) Ground Truth Solutions.*

Participation

Participation of service users is an important element in many data stewardship mechanisms globally, and would be a huge step forward in the humanitarian sector.

PARTICIPATION OF SERVICE USERS IS AN IMPORTANT ELEMENT IN MANY DATA STEWARDSHIP MECHANISMS GLOBALLY, AND WOULD BE A HUGE STEP FORWARD IN THE HUMANITARIAN SECTOR.

Participation takes the involvement of aid recipients further to give them a voice in the decision-making around how their data is used - not just as individuals, but more broadly. In the case of this pilot, this would mean representation (either elected or appointed) in the governance structure of the data steward.

These representatives could (for example) be appointed from existing community structures that CCD members already work with, or be proposed by Community-Based Organisations that work at the local level. We recognise that due to the digital-first nature of many CVA interventions in Ukraine, the humanitarian community may be lacking relations with these communities and communication channels that they may have had in other countries.

The cultural context (mentioned in the Accountability section, above) may frame certain types of participation as less appropriate if communities are used to the government taking on civic responsibilities with minimal or non-existent “participation” by those communities. In addition Ukraine has around 3.5 million IDPs (as of April 2023), whose communities may not be stable or coherent enough for active participation. The exact nature of participation therefore remains open, and will need to be decided by the participating organisations.

Localisation

Localisation

Localisation is already a pressing concern in Ukraine, where the government has already begun preparing to transition humanitarian CVA to social protection through the Perekhid initiative. The first steering committee meeting for Perekhid was held in late March 2023, chaired by the Minister of Social Policy, and intended to develop a technical facility in the Ministry to support such a transition when the situation stabilises.

However participants stated that the timeline for Perekhid remains unclear while the war continues, and that there will still be a humanitarian caseload even after the majority of recipients have been transferred to the Ukrainian state. This is a relatively novel requirement in the humanitarian sector which will require a great deal of planning which has only just started, so the need for referrals between humanitarian organisations will continue.

Sovereignty

All participating organisations store their operational data on servers either inside Ukraine or in the European Union (which is an acceptable jurisdiction for the Ukrainian government).

Sustainability

The sustainability of the pilot will need to be an ongoing discussion due to the volatile nature of the operating environment and uncertainty around government plans.

THE DATA STEWARD

Role

A referral system is made up of three components: an Enabling Environment, a Referral Pathway, and Key Infrastructure and Inputs. The pilot should contribute materially to the last two of these components, enhancing the referral pathway within the management structure (particularly at the stage of client feedback, which needs to be expanded) and providing support to infrastructure and inputs, potentially with platform development.

There are different approaches to establishing a referral pathway; the diagrams below are simplified illustrations of these different approaches. Diagram 2 shows the current referral model for CCD members, in which referral data moves bilaterally between two organisations.

Diagram 2: the Current Referrals Model

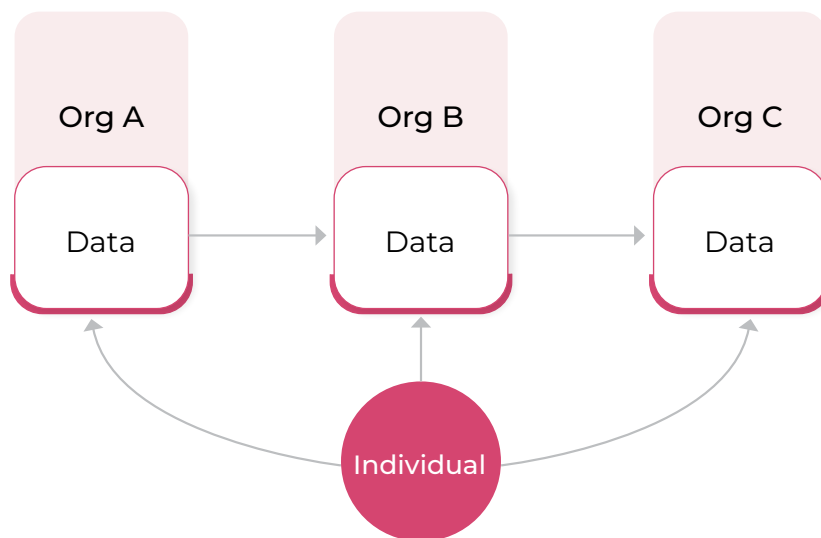
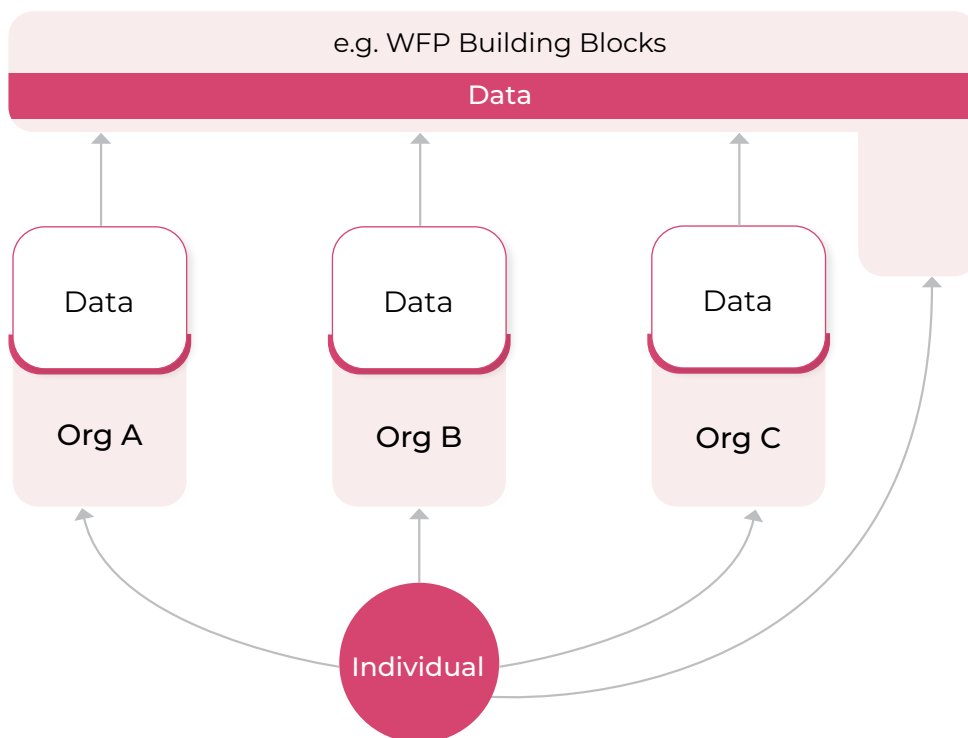


Diagram 3 shows a more centralised model in which e.g. a UN or government agency has the mandate to handle referrals, and takes on the role of a “clearinghouse” for referrals. This model is currently being used in Ukraine for a different function - that of deduplication, which is being handled by WFP’s Building Blocks platform, which acts as a central authority to which NGOs submit their datasets.

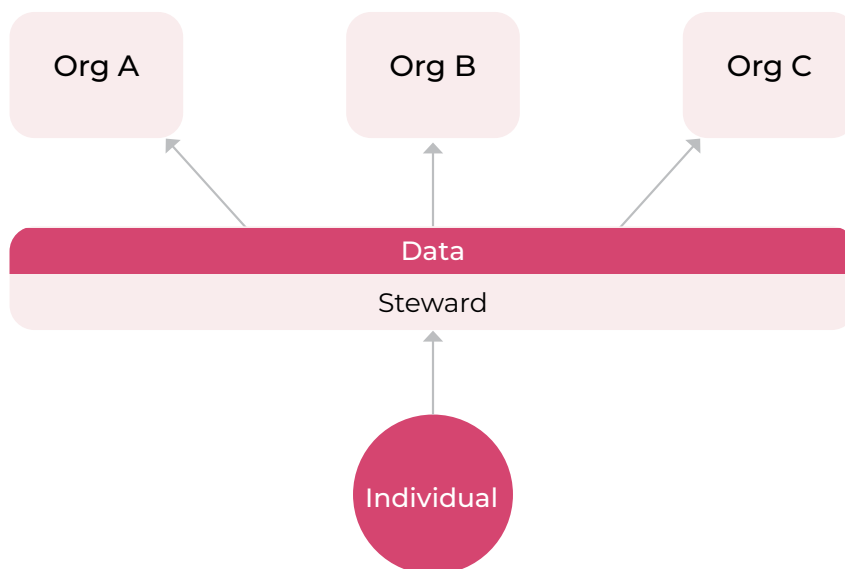
Diagram 3: the “Command and Control” model



This deduplication function highlights some of the problems with this model when it is not embedded in a responsive governance framework. Research revealed dissatisfaction among NGOs about the way in which deduplication is handled - including policy questions about why there were no data-sharing agreements in place, and practical complaints about the fact that this form of deduplication does not identify whether individuals who appear in Building Blocks as being registered twice have been assisted twice - or in fact not assisted at all.

We are interested in testing an alternative to these two models based on CCD members' existing collaboration; a collective approach based on a data steward that takes on the “clearing house” role on behalf of aid recipients. Diagram 3 shows the broad shape of this concept when compared to the two models described above.

Diagram 4: the Data Stewardship model



The pilot should test whether the stewardship model can deliver at least the same quality of referral as the two other models. Most of the outstanding questions concern trust: as part of a referral, a receiving organisation could accept registrations and/or assessments conducted by a sending organisation, or whether re-registration will be required? In the context of the referral mechanism, can we move away from bilateral trust to provide some form of quality assurance regarding service quality? The pilot will work through these questions with existing consortium members.

The pilot itself will contribute to a more systematic approach to referrals; although we set up these systems frequently, we often have no idea about how we're going to provide better access to data in order that aid recipients can track their referral process or actively manage their data.

THE STEWARDSHIP MODEL SHOULD ALSO ADD VALUE PRIMARILY THROUGH THE DESIGN PRINCIPLES RELATING TO DEMOCRATISATION, THROUGH A CLEAR MANDATE TO REPRESENT THE INTERESTS OF AID RECIPIENTS.

The stewardship model should also add value primarily through the design principles relating to democratisation, through a clear mandate to represent the interests of aid recipients. In practice this means improving data governance - initially collectively, and then for individual organisations if the pilot demonstrates successfully that increased accountability and participation helps to improve their programmes.

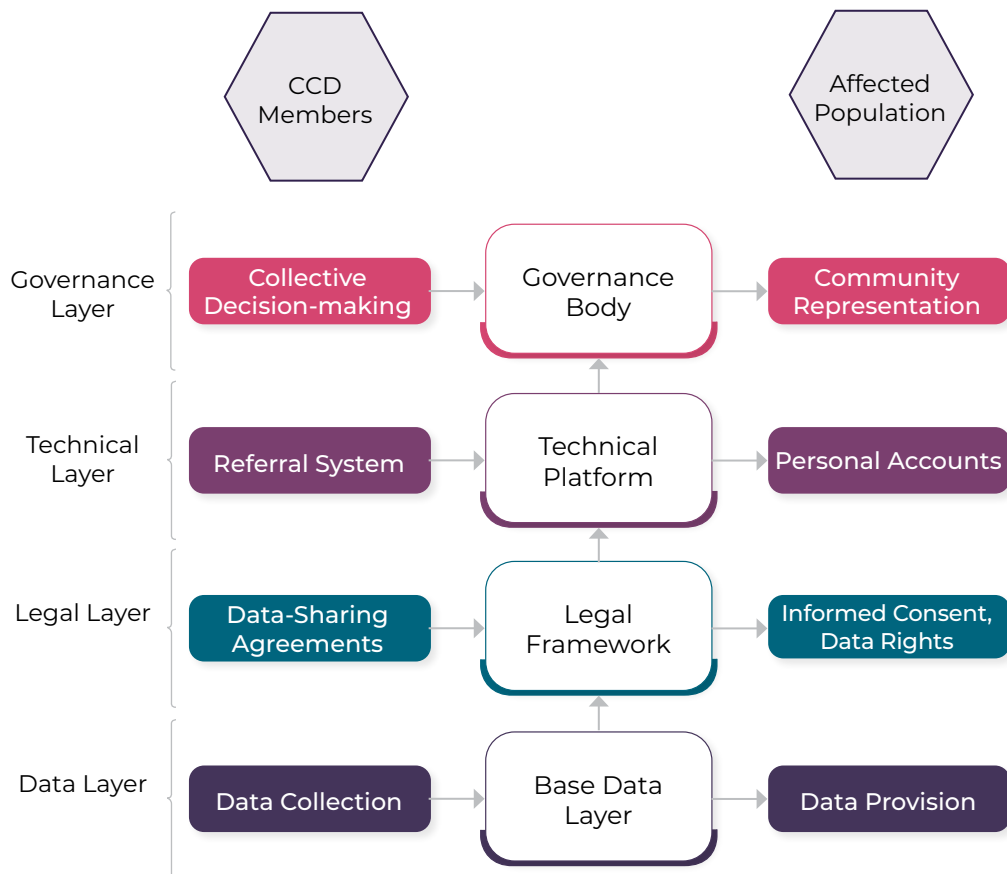
Such an approach will take the burden of responsibility for organising and managing referrals from participating organisations, becoming a shared responsibility with no single agency holding a monopoly and accountability being generated through peer mechanisms. If the pilot in addition builds a platform that is account-based, this will also provide a platform for data portability, since it holds a collective register and can respond to portability requests, either from a participating organisation or a data subject.



Form

We have developed a Stack Model as the basis for design (Diagram 5 below), where the stack consists of four Layers: Data, Legal, Technical and Governance. All four Layers must be addressed during design and implementation, particularly to ensure that the different stakeholder groups that the different stakeholder groups are able to engage with each layer.

Diagram 5: Stack Model of the Referral Pilot



THE KEY DESIGN QUESTION IS WHAT SORT OF INTERMEDIARY IS REQUIRED TO PERFORM THIS FUNCTION, AND HOW IT SHOULD BE SET UP. RATHER THAN CREATING A NEW ENTITY, WE PROPOSE A “VIRTUAL” DATA STEWARD (AS OPPOSED TO A SEPARATE LEGAL ENTITY) WHICH BUILDS ON EXISTING STRUCTURES TO DELIVER ADDITIONAL VALUE.

The key design question is what sort of intermediary is required to perform this function, and how it should be set up. Rather than creating a new entity, we propose a “virtual” data steward (as opposed to a separate legal entity) which builds on existing structures to deliver additional value. The structure should be federated rather than centralised, i.e. any lead agency which hosts the data steward mechanism does not act as an authority but as a steward on behalf of the participating organisations - and on behalf of the aid recipients.

It is worth noting that the Technical Layer is just one part of the design, and not usually the most important part. The Technical Layer does not necessarily require that everybody must use the same platform to achieve the interoperability necessary for a design to function; while it may involve developing a new platform, the exchange of data may be handled through e.g. APIs or (more likely in this case) while management is handled collectively.



Layer Design

Stakeholder Recommendations

Stakeholder Group	Recommendation
Local communities	The pilot must engage local communities, but the best approach is unclear. We are currently commissioning a survey to better understand community perceptions of how their data is used, and will continue to discuss with CCD members.
International and national NGOs	The pilot should work with an existing consortium to support their referral system, building on existing trust to improve data governance using CCD funding.
UN agencies	The pilot should focus on its NGO constituents, but will liaise with UN agencies to ensure that both sets of stakeholders benefit from pilot outcomes.
Governance agencies	The pilot should not involve government agencies in the initial stages, but should ensure that it is fully coherent with any state plans for humanitarian transition.
Private companies	The pilot should include private companies in the pilot only if a third party contractor is required for a technical requirement which cannot be met by CCD members.

Layer	Brief Description	Notes
<p>Data</p>	<p>The existing data that is already collected by participating organisations.</p>	<p>In the pilot phase, participating organisations should retain their own data for operational purposes (e.g. internal monitoring), but will also pool it on the platform for two purposes:</p> <ul style="list-style-type: none"> 1 the referral process 2 the provision of client accounts <p>The pilot should store pooled data on servers either inside Ukraine or in the European Union. The long term goal is to test whether we can move from bilateral to collective referral mechanisms, and from individual to collective data management.</p> <p>The pilot participants should make its data standards and processes as open as possible to ensure that they can be accounted for in the planning for localisation via Perekhid. The pilot should be at least bilingual (English and Ukrainian) in its public-facing components, and in any published documentation.</p>
<p>Legal</p>	<p>The agreed policies and processes required to carry out referrals.</p>	<p>The pilot will provide at minimum the same level of data protection as the participating organisations. It will need to extend or expand existing DSAs to facilitate referrals more effectively while still complying with Ukrainian legislation.</p>

Layer	Brief Description	Notes
Legal (continued)		<p>The pilot will review informed consent requirements under Ukrainian law to address restrictions raised by design participants, with the possibility of new consent forms specifically to address referrals.</p> <p>The pilot will carry out a simple risk assessment to identify and account for specific issues of concern (e.g. sharing data of conscription-age men).</p>
Technical	<p>The hardware and software required to carry out the referral function, as well as any protocols necessary for data sharing.</p>	<p>Unlike de-duplication, there is no CCD-agreed “referral process” which can be used as a basis for development. The pilot should use the generic referral process described in this document as its starting point for technical development.</p> <p>Participating organisations should validate the generic referral process and agree on the minimum data fields necessary for referral. In order to ensure good practice is observed, this agreement on data fields should draw on existing guidance issued for e.g. protection referrals in Ukraine.</p> <p>The primary technical requirement is an encrypted data processing platform will be required to handle the referral data, which will be developed in the next phase of pilot planning, most likely using existing CCD member capabilities.</p>

Layer	Brief Description	Notes
<p>Governance</p>	<p>The agreements and structures that determine how the stakeholders relate to each other and make decisions collectively - the stewardship mechanism itself.</p>	<p>This layer is what distinguishes the pilot from other initiatives. We propose that the pilot work closely with one of the existing consortia (including both CCD and non-CCD members) that are already planning or setting up referral systems.</p> <p>A “virtual” data steward can be offered to such a consortium, extending their existing working relationship to include joint and democratic decision-making process regarding use of pooled data. The steward should be hosted by one of the consortium members, which will not have authority over other members, but should act as a steward on behalf of the participating organisations and aid recipients.</p> <p>This steward will be created through governance documents which will be developed in the next phase of pilot planning. These documents should require it to establish communication channels with communities about the referral process and their rights. If possible this layer should also incorporate participation in the decision-making process by community representatives, either appointed by CCD members who work with them, or represented by Community-Based Organisations.</p>

APPENDIX 1:

Design Principle Definitions

The 9 Data Governance Design Principles

Principle	Definition	Source
Data Protection group		
Security	Data security is the practice of protecting digital information from unauthorized access, corruption, or theft throughout its entire lifecycle.	https://www.ibm.com/topics/data-security
Privacy	Data privacy... is an area of data protection that concerns the proper handling of sensitive data... to meet regulatory requirements as well as protecting the confidentiality and immutability of the data.	https://www.snia.org/education/what-is-data-privacy
Transparency	Data transparency provides customers with an inside look into how their data is collected and used... customers should know why you need their data, how their information is gathered, where it is stored, and how it is protected.	https://blog.hubspot.com
Democratisation group		
Accountability	Accountability to affected people is a commitment by humanitarians to use power responsibly: to take account of, give account to, and be held to account by the people we seek to assist.	https://www.unocha.org/themes/accountability-affected-people

Principle	Definition	Source
Accessibility	The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and [associated] information.	https://gdpr-info.eu/art-15-gdpr/
Participation	effective “participation” of people affected by humanitarian crises puts the needs and interests of those people at the core of humanitarian decision making, by actively engaging them throughout decision-making processes.	https://interagency-standingcommittee.org
Localisation group		
Localisation	the process of having a humanitarian response owned in part or whole by a national and/or local constituency well-versed in the needs and socio-cultural context of the area in crisis.	https://resourcecenter.undac.org
Sovereignty	the understanding that data which are stored outside of an organization’s host country and still subject to the laws in the country where the data are stored.	https://purdue.edu/critical-data-studies
Sustainability	the ability of an organization to continue its mission or program far into the future. All projects have to end eventually, but the project impact should continue.	https://proposalsforngos.com/what-is-project-sustainability/

DESIGN PROCESS REPORT

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