

## Data privacy and information protection protocols

December 2020

This document outlines the protocols and procedures put in place by the Yemen Conflict Sensitivity Platform to secure and process any information or data collected as part of Platform activities. This includes: the team responsible for data processing, the types of information collected, data storage, and rules for sharing information collected by the Platform.

### 1. Who is responsible for data processing and protection?

The Yemen Conflict Sensitivity Platform team is responsible for collecting and ensuring protection of any and all data or information shared under the auspices of the Platform and its activities. The Platform team includes staff in Amman, Jordan and Aden, Yemen, but most information will be held by the team based in Amman. As the Platform is a partnership between Search for Common Ground and Seton Hall University's School of Diplomacy, each partner provides internal data protection coverage through its individual policies, with additional security measures put in place to ensure information collected under Platform activities is not shared with the broader Search organisation or Seton Hall department.

### 2. What information/data is processed and for what purpose?

Three types of data are collected and processed by the Platform:

- **Contact information:** Individual contact information of participants in the Technical Working Group, Donor Advisory Group, training sessions, and those requesting assistance under the draw-down facility. Contact information includes: Name, organisation and role, email address, phone number, skype address. This information is collected for outreach about upcoming meetings and training opportunities, and is not shared outside the Platform team. Names and email addresses of participants in training sessions and the Technical Working Group will not be shared with other participants; communication from the Platform will always keep participants in blind copy on emails. This information is also used to collect data on the numbers of participants in Platform activities, which informs monitoring and evaluation results as well as reporting to the Platform donor, DFID.

Hard copy attendance sheets for working group meetings or training sessions, which are collected for documentation and procurement confirmation purposes, will be scanned into the Platform's secure system and then physical copies destroyed within a week of the meeting.

- **Organisation information:** Organisational information and/or resources (which could include project documents, evaluations, pictures, activity reports, attendance records, staff lists, etc.) shared with the Platform for inter-agency learning, development of training sessions, research and analysis purposes, and/or assessment (as a part of a specific draw-down support request). This type of information is collected as part of the Platform's efforts to facilitate lesson-sharing and build contextualised examples for conflict sensitive aid practice in Yemen.
- **Monitoring and evaluation:** For Monitoring & Evaluation purposes, data relating to participants' experience, skill acquisition, and behaviour changes is collected through

surveys, pre- and post-activity questionnaires, and interviews and focus groups. This data collection is conducted on a voluntary basis. Data collected is anonymised and is only used to inform and evaluate Platform activities.

### **3. Where is the data kept and who has access?**

Data and information collected by the Platform is stored on the Platform's Online Shared Drive, with access to all folders limited to the core Platform team members. As noted above, information will not be shared with Search or Seton Hall staff who are not members of the Platform team, other than anonymised or general data used for purposes of monitoring and evaluation or reporting. In cases where additional privacy is deemed necessary, Platform team members can sign non-disclosure agreements and limit access to certain information to only those staff who will process the information. Hard copies of documents will be stored securely in the Amman office of the Platform and shredded once no longer in use; hard copies of documents and information will not be stored in the Platform's office in Yemen.

### **4. Is individual or organisational information shared, and if so, how?**

Unless otherwise specified and prior consent gained, no attributable information will be shared with Platform participants, partners, or other stakeholders. Likewise, no attributable information will be published on the Platform website or included in documents produced without prior consent from the relevant agency.

Additionally, the names of individuals and organisations participating in the Technical Working Group, Donor Advisory Group, and any training sessions in Yemen or elsewhere will not be disclosed. Rather, the Platform will anonymise any descriptions of participation (e.g. '13 INGOs and UN agencies were represented in the meeting'). More information about the sharing of information collected under the Platform can be found in the table below.

### **5. How long is the data or information kept?**

Information collected under the Platform will be stored until the end of the YCSP project (July 2021) for monitoring and evaluation purposes. At any time, individuals can request that their contact information be removed from Platform distribution lists. If organisational information is deemed highly sensitive, information or organisational resources can be deleted upon request. Information is only stored for purposes of learning on conflict sensitivity, informing more effective aid responses, and monitoring and reporting. At the conclusion of the project, all digital and physical data (except any information required for procurement or reporting documentation) will be systematically erased and/or destroyed. All online folders will be cleared of sensitive information as part of the project close-out process.

### **6. Right to have recourse in case of conflict on data:**

All programmatic and research activities will comply with all relevant legal and regulatory frameworks regarding data security, personal privacy and research ethics, including the General Data Protection Regulation (GDPR).

**Data/information sharing rules:**

<b>Type of information</b>	<b>Information processing &amp; storage</b>	<b>Distribution/Use</b>	<b>Additional procedures or protocols</b>
<b>Comments or information shared during Technical Working Group or Donor Advisory Group meetings</b>	All meetings held under Chatham House rule, meaning comments are not attributed to any agency or individual	Meeting reports are anonymised and comments generalised to not reference any agency or individual, except where the agency/individual agrees to be identified	If necessary to name a particular agency, YCSP will seek approval and consent from that agency before distributing a meeting report
<b>Individual and agency names of those participating in Technical Working Group meetings, training sessions</b>	Contact information stored in a limited-access folder on the Platform system.	Not distributed outside the Platform team. Individual participation in meeting or training sessions is kept anonymous, with no agencies identified without prior consent	If necessary to name a particular individual or agency, the Platform will seek prior consent and will not otherwise share individual or agency contact information.
<b>Public reports from INGOs, UN agencies, think tanks, donors, etc.</b>	No restrictions beyond normal copyright and use rules.	Cite and reference per standard copyright rules	N/A
<b>Organisational internal documents, resources, and materials shared as part of lesson-sharing or draw-down support request.</b>	All materials and resources will be securely stored on the Platform system, with access limited only to those staff directly working on the topic.	No distribution of materials unless authorised by the owner agency, but content may be referenced if anonymised and not attributed.	If necessary, Platform staff can sign a non-disclosure agreement before accessing certain proprietary or sensitive information.
<b>Operational information shared as part of research or analysis</b>	Research questionnaires or interview notes will be stored securely on the Platform's system	All information shared for research and analysis purposes will not be attributed to any particular agency or individual	Interview citations will be generalised (e.g. 'Program staff of international NGO')