

Webinar 18: Data Protection

The Use of Cash & Markets in the Red Cross Red Crescent Movement

24 February 2021



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	Agenda	Speaker
3 mins	Housekeeping	David Dalgado, Cash Hub team, British Red Cross - Host
7 min	Introduction to CVA and Data Protection	Joseph Oliveros , Cash Innovations Senior Officer, IFRC
10 mins + 5mins Q&A	Hellenic Red Cross – CVA and Data Protection	Sophia Peponi , Cash Transfer Programming (CTP) Coordinator, Hellenic Red Cross
10 mins + 5mins Q&A	Nigerian Red Cross – CVA and Data Protection	Dauda Mohammed , CTP and Livelihood Focal Point, Nigerian Red Cross
7 mins	ICRC key takeaways and key actions	Ben Hayes , Data Protection Legal Adviser, ICRC Jo Burton , Global CVA Lead, ICRC
10 mins	Q&A	Questions & Answers Speakers joined by James De France , Senior Legal Counsel and Data Protection Officer, IFRC

Joseph Oliveros, Cash Innovations Senior Officer, IFRC

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Hellenic Red Cross

Data Protection and CVA

Cash Hub Webinar

Data Protection and CVA

24 February 2021

Sophia Peponi, Cash Transfer Programming (CTP)
Coordinator, Hellenic Red Cross



Context - Greece

Greece → member of the European Union → bound by the EU General Data Protection Regulation (GDPR). National law 4624/2019 supplements the EU Regulation

The Hellenic Red Cross (HRC) has appointed a firm as a Data Protection Officer (DPO).

- DPO = responsible for data protection
- HRC = responsible for collection, processing, storage. Sets the means and the purpose for data collection and processing.

Cash Assistance interventions/programmes in Greece

- Hellenic Red Cross domestic cash activities → Hellenic Red Cross the controller of data collected
- IFRC Greece/Hellenic Red Cross implementing partners of UNHCR for the multipurpose cash assistance to asylum seekers → UNHCR the data controller

Context – HRC Cash profile

- Use of cash across all HRC sectors and regular programmes/services (emergencies, social welfare, assisted living in quarantine, about to roll-out Covid19 socio-economic impact, plan for conditional cash for health, and for protection).
- Capacity to reach with cash assistance 800-1000HH with the current resources
- Cash and Data Protection: mapping, identification of gaps, security, forms (new consent form, annex to all staff contracts, forms for volunteers, etc.)
- HRC in the Data Protection consultation



Planning process - Questions raised

Data collection using KoBo – online registration form

- Generic or personal email for the KoBo account?
- Who should have access to the server?
- Who should have access to the Masterfile?
- Is it possible to have different access rights to the server?

Confusing issues, second thoughts, doubts, potential risks, limitations

- Quality programme Vs need for more personal data
- Extra manual workload Vs online collection
- Do we collect more than we need? Do we collect more by habit?

Data sharing agreements



Example: IFRC Greece has a data sharing agreement with UNHCR, that defines the role and responsibilities of the two parties in the Processing and Protection of Personal Data (*Multipurpose Cash Grants programme for Asylum Seekers*)

- The nature and purpose of processing
- The **necessary personal data** to be processed by activity
- Access rights, Storage, etc.

Important for any data sharing agreement to be negotiated.

Impact of the GDPR

How GDPR has impacted our plans and time of response



Practical examples in emergencies:

- **Floods, December 2017** (lists of affected HH from the local authorities → HRC selection and targeted registration → bank transfers in **7 days** from disaster date).
- **Wildfires, July 2018** (not able to receive lists of affected HH → HRC own full registration, validation, selection → bank transfers **4 weeks** after the registration starting date).

Time to be proactive!

- Red Cross/Red Crescent Pre-agreements with the local authorities in prone areas for data sharing in emergencies? [Cash and cross-sectoral quicker response].
- Disaster Preparedness (DM dialogue with Civil Protection?).

Challenges – lessons learnt

- **Understand the responsibility!**

Example: donor requesting HRC to share the beneficiary list without a prior agreement or beneficiaries' consent → HRC as the controller of the data collected did not share without a prior consent of the beneficiary.

- **In a partnership, important to know who is the controller of the personal data you collect!**

Example: Greek authorities requesting from the field teams to share beneficiaries data → incident raised to UNHCR and discussed widely in the Cash WG with all partners

“Any incoming requests for sharing of personal data addressed to the Partner from third parties..., should be redirected to UNHCR as the Data Controller”, source: UNHCR/IFRC Agreement, Processing and Protection of Personal Data of Persons of Concern.

Way forward

- Internal policies for data protection are being drafted at the moment so that HRC fully complies, beneficiary registration forms and consent forms have also been revised.
- Currently working on adjusting the Practical Guidance for Data Protection in Cash and Voucher Assistance to the national law and internal policies that are under development (expected early March).
- There is always a need for more **good practices and transparency** towards our recipients of cash assistance and the Practical Guidance is a very good tool.

Key messages

- Requirement for a DPO or not, **follow data protection principles**, using the existing resources (i.e. NS legal dept. / advisor).
- **Clarify data sharing requests** from your donors and/or negotiate relevant agreements before you start implementing.
- CVA practitioners may not be data protection experts, but it is **important to recognize potential risks and seek for assistance** from those who have the expertise to provide support.
- **Let Cash lend its good practices** to other sectors and services in your National Society!

Any Question?

Thank you!

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“The Use of Cash and Markets in the Red Cross Red Crescent Movement”

theme:

Cash and Data Protection.

24th February, 2021

Dauda Mohammed
Assistant Coordinator DM
– CTP & Livelihood Focal Point.





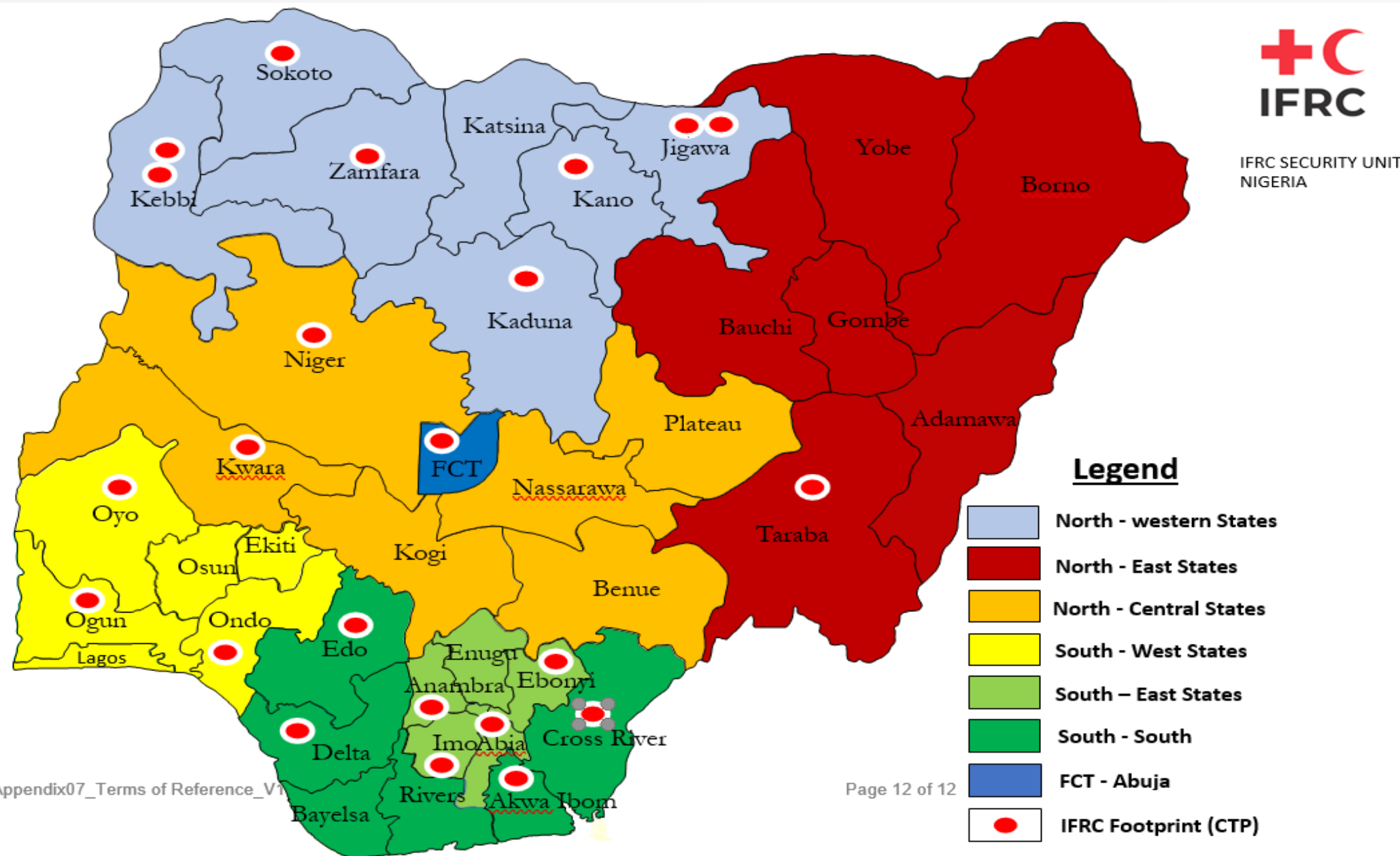
OUTLINE PRESENTATION



- **BACK GROUND**
- **DATA PROTECTION & RISK MANAGEMENT**
- **DATA PROTECTION – FEARS/ RISK**
- **PRINCIPLES OF DATA PROCESSING IN PRACTICE**
- **CONSENT IN COVID 19 OPERATION**
- **PRACTICAL RECOMMENDATION**



BACK GROUND – PAST CTP EXPERIANCE IFRC



2015 - ICRC	100HHs (4 states) 450HHs (4 states)
2016 - ICRC	50,288 (5 states)
2017 - ICRC	5,565HHs (5 states)
2018 - IFRC CTP – 5,000HHs	NRCS Cash Transfer Programme 878HHs (5 states)
2019- IFRC	3600HHs (4 states)
COVID-19 DREF 2020 - IFRC	3600HHs (12 states) 2000HHs (5 states) 1800HHs (6states)

- The Nigeria Data Protection Regulations ("NDPR") was issued by the National Information Technology Development Agency ("NITDA").



IMPORTANCE OF DATA PROTECTION & RISK MANAGEMENT



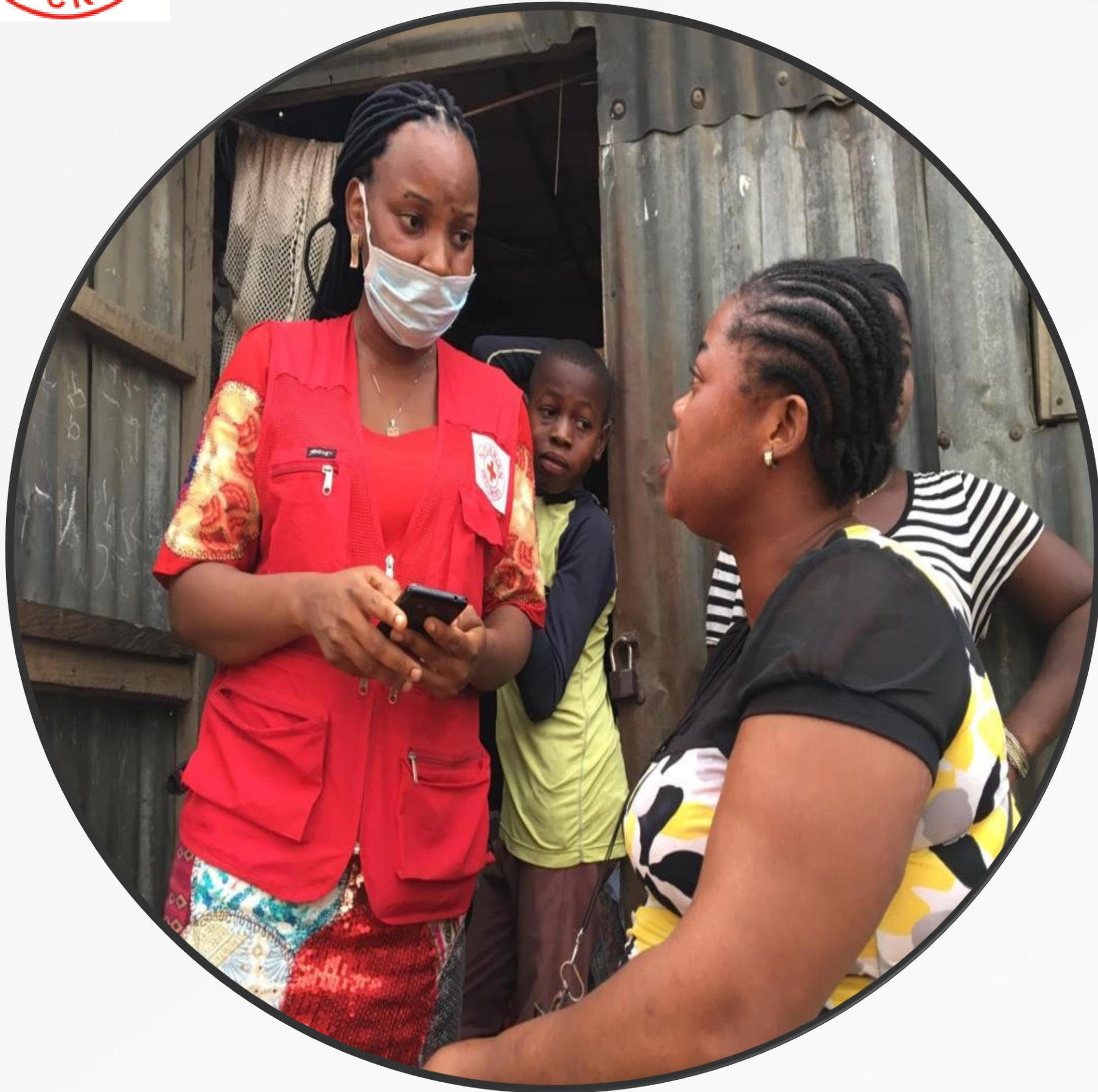
“The process of safeguarding important information from corruption, compromise or loss. *The term is also defined as: “The legal mechanism that ensures privacy.”*



Its a major concern considering our mandate to uphold the humanitarian principle of ‘do no harm’.



DATA PROTECTION – FEARS



- ***Political fears***
- ***Personal fears***
- ***Insecurity fears***
- ***Social fears***
- ***Structural fears***



PRINCIPLES OF DATA PROCESSING IN PRACTICE



- ☐ All relevant government agencies, management, staff, branches, volunteers and communities are notified and acquainted with the data protection requirements
- ☐ Communities are fully aware the purpose through the community engagement and accountability tool
- ☐ Selection of beneficiaries is done guided by the selection criteria agreed upon
- ☐ Data are sent for cleaning and onward sharing with third parties after sorting, minimization, encryption and so on
- ☐ Ensuring that the final data to be documented is accurate, complete and of quality



DATA PROTECTION CONSENT IN COVID 19 OPERATION



- **Why:** Covid-19 and lock down economic effect
- **When:** COVID-19 pandemic
- **Who:** NHQ staff Branches, volunteers and communities
- **How:** Communication with communities through CEA
- **Where:** through the system/gadgets

NB: Consent is critical and tend to be gotten form the population we serve.



RAW DATA (BAR CODE)



Data collection

- Personal data
- Demography
- Situation
- Vulnerability
- Control.

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2	2020-11-18T12:19:38.311+01:00	2020-11-18T12:24:49.409+01:00	Yes	Ebu	8037		KWARA		o	ji		18-30	1	
3	2020-11-18T09:37:24.255+01:00	2020-11-18T09:43:44.720+01:00	Yes	Sul	8169		KWARA		p	mm		31-45	1	
4	2020-11-17T13:40:05.423+01:00	2020-11-17T15:15:47.038+01:00	Yes	DAI	7035		KWARA		lo	AMN	JY		2	
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6	2020-11-17T15:39:18.161+01:00	2020-11-17T15:53:39.710+01:00	Yes	DAI	7035		KWARA		m					
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8	2020-11-17T16:06:53.184+01:00	2020-11-17T16:15:23.222+01:00	Yes	DAI	7035		KWARA						2	
9	2020-11-17T16:15:38.266+01:00	2020-11-17T16:22:47.113+01:00	Yes	DAI	7035		KWARA					31-45	2	
10	2020-11-17T14:45:35.075+01:00	2020-11-17T15:05:52.315+01:00		Kas	8139							18-30	2	
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15	2020-11-17T15:47:58.918+01:00	2020-11-17T15:59:07.807+01:00					KWARA					31-45	5	
16	2020-11-17T16:37:49.033+01:00	2020-11-17T16:45:37.048+01:00	Yes				KWARA		IK	AMN		46-60	2	
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2	1	0	0	1	0	1	0	0	No	Home Own	Male	voters ID	-71	607	160	8.74	-16667	5
3	1	0	0	0	1	0	1	1	No	Host Com	Male	voters ID	-14	551	160	8.71	-11667	5
4	2	2	4	0	2	0	2	0	No	Host Com	Male	voters ID	-61	327	160	8.74	-14952	
5	3	4	3	0	0	0	0	0	No	Home Own	Male	voters ID	-53	319	160	8.74	-16667	5
6	2	5	8	1	3	3	3	0	No	Host Com	Male	voters ID	-29	320	160	8.74	-16667	5
7	2	3	1	0	3	7	1	0	No			voters ID	-42	325	160	8.74	-14955	5
8	2	1	2	0	1	3	2	0	No			voters ID	-50	326	160	8.74	-19475	
9	2	6	2	0	3	2	3	0	No	Home Own	Male	voters ID	-35	351	160	8.74	-19535	5
10	2	0	2	3	1	0	2	0	No	Home Own	Male	voters ID	-69	669	160	8.74	-18333	
11	8	2	2	0	2	1	1	0	Yes	Home Own	Male	voters ID	-67	670	160	8.74	-18333	5
12	2	0	1	0	1	2	0	0	No	Home Own	Male	voters ID	-56	664	160	8.74	-16667	
13	0	2	1	2	2	3	2	2	No	Home Own	Male	voters ID	-94	693	160	8.74	-13333	5
14	2	3	4	0	0	4	2	0	No	Home Own	Male	voters ID	-79	357	160	8.74	-18333	5
15	5	1	2	1	0	1	1	0	No	Home Own	Male	voters ID	-46	687	160	8.74	-18333	5
16	2	5	3	0	0	2	2	0	No	Home Own	Male	voters ID	-84	341	160	8.74	-11667	5
17	0	2	2	0	0	2	2	0	No	Home Own	Male	voters ID	-17	688	160	8.74	-19565	
18	3	4	2	1	2	4	3	0	No	Home Own	Male	voters ID	-10	350	160	8.74	-18333	5
19	2	1	2	0	1	3	2	0	No	Home Own	Male	voters ID	-28	404	160	8.74	-19555	5
20	1	1	0	0	0	2	1	0	No	Home Own	Male	voters ID	-27	684	160	8.74	-19555	5

Sample RAW DATA showing (BAR CODE) in yellow linked to beneficiary information's.



MINIMIZATION – DATA SHARED WITH FSP



NIGERIAN RED CROSS SOCIETY											
NATIONAL HEADQUARTERS											
ABUJA											
CTP Beneficiary List				State: Kwara		L.G.A.: Edu LGA		Total Number: 183		Female: 44 Male: 139	
SN	Surname	First Name	Barcode Number	Picture/Control Number	Gender	State	LGA	Community/Village	Amount	Signature	Date
1	med		300	1605521649617.jpg	Male				₦ 30,500		
2			691	1605622122208		RA	EDU	logi	₦ 30,500		
3					Male	RA	EDU		₦ 30,500		
4	med	esun	266	1605521711265.jpg	Male	RA	EDU		₦ 30,500		
5		hitsu	179	1605522585775.jpg	Male	RA	EDU	ko	₦ 30,500		
6		an	169	1605523054111.jpg	Male	RA	EDU	ko	₦ 30,500		

Sample minimized clean data showing (BAR CODE)



PRACTICAL RECOMMENDATION



1. ***Communication***
2. ***X-raying data processing***
3. ***Informing beneficiaries***



Jo Burton, Global CVA Lead, ICRC
Ben Hayes, Data Protection Legal Adviser, ICRC

(Stop sharing slides so video feed can be shared)

Questions and Answers

Please post questions in the chat,

(Stop sharing slides so video feed can be shared)

Thank You

- **Joseph Oliveros**, Cash Innovations Senior Officer, IFRC
- **Sophia Peponi**, Cash Transfer Programming (CTP) Coordinator, Hellenic Red Cross
- **Dauda Mohammed**, CTP and Livelihood Focal Point, Nigerian Red Cross
- **Ben Hayes**, Data Protection Legal Adviser, ICRC
- **Jo Burton**, Global CVA Lead, ICRC
- **James De France**, Senior Legal Counsel and Data Protection Officer, IFRC
- **Stefania Imperia**, Knowledge Manager, Cash Hub Team
- **Cara Wilson**, Team Coordinator, Cash Hub Team

Next Webinar (To Be Confirmed) 17 March – Linking CVA & Social Protection

www.cash-hub.org - Cash Helpdesk available for all RCRC Movement CVA support