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## **SHELTER/NFI SECTOR/CLUSTER INFORMATION-SHARING AND DATA CONFIDENTIALITY PROTOCOL**

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### **Introduction:**

According to IASC guidelines, sector leads “are responsible for generating up-to-date sector specific information (e.g. contact lists, meeting minutes, standard forms, policy or technical guidance, datasets, needs/gap analysis, etc.) and sharing it with OCHA in order to support inter-sector data sharing”. In addition, where needed, sector leads are responsible for “establishing a data confidentiality and privacy policy within their sector, which ensures that sensitive, personally identifiable datasets are suitably anonymized.”<sup>1</sup>

This policy has been developed in accordance with IASC guidelines.

### **Purpose:**

This document aims to provide the basis for an agreement between the Shelter/NFI Cluster and the member organizations engaged in the humanitarian response in Syria through the Cross-Border Operation to facilitate and govern the efficient, effective and secure sharing of good quality information.

The Shelter/NFI Sector/Cluster strives to inform all relevant humanitarian stakeholders about Shelter/NFI needs, gaps, trends and response in Syria. In order to achieve this aim, the Sector/Cluster encourages its members to be proactive in sharing all relevant information with the sector leads to enable regular credible response monitoring and analysis. This is essential to inform development and implementation of the Shelter/NFI sector/Cluster strategy along with inter-sector response planning processes for the broader humanitarian response in Syria.

Due to the complex security and operational environment for cross-border actors providing services from Turkey, and in line with the Sphere Protection Principle of ‘do not harm,’<sup>2</sup> the information sharing protocol prioritizes the safety and security of those who may be identifiable from the information (affected population, Shelter/NFI sector/cluster members, their staff and partners).

The overall approach to dealing with information entrusted to, or originating from, the Shelter/NFI Sector/Cluster is based on the understanding that the work of the Shelter/NFI Sector/Cluster should be open and transparent, except if the nature of the information concerned is deemed confidential.<sup>3</sup>

The Shelter/NFI Sector/Cluster recognises the benefits of information sharing, including:

- Better triangulation of information and corroboration of evidence
- Better informed decision making
- Improved inter-agency collaboration
- Increased access to information on needs and gaps
- More effective intervention, support and targeting of resources
- Improved protection of individuals at risk
- Conducting joint analysis
- Building a common understanding of the Shelter and NFI Sector situation

### **Application:**

This policy applies to Shelter/NFI Sector/Cluster Coordinators and all Shelter/NFI Sector/Cluster members. This policy applies to both primary and secondary data.

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<sup>1</sup> IASC Operational Guidance on Responsibilities of Cluster/Sector Leads and OCHA in Information Management

<sup>2</sup> The Sphere Project – Protection Principles - <http://www.spherehandbook.org/en/protection-principle-1-avoid-exposingpeople-to-further-harm-as-a-result-of-your-actions/>

<sup>3</sup> This information sharing protocol does not include specifications for sharing individual case-related data. Information sharing related to individual cases will be elaborated in SOPs and other relevant documents specified to the sector/cluster



**Agreed principles and commitments:**

- The Shelter/NFI Sector/Cluster will abide by IASC guidelines<sup>4</sup> on information management, sharing and confidentiality, and operate on the principle that humanitarian information/data should be made accessible to all humanitarian actors, unless sharing the data threatens the humanitarian space and safety of the organization, its staff and partners.
- The Shelter/NFI Sector/Cluster agrees that information management and exchange should be based on collaboration, partnership and sharing with a high degree of participation and joint ownership.
- The Shelter/NFI Sector/Cluster Coordinators and members agree to utilise/share information in a manner that recognises the sensitivities associated with this humanitarian response and respects the need for confidentiality, anonymisation and approval of Shelter/NFI Sector/Cluster members prior to further sharing of information provided by Shelter/NFI Sector/Cluster members.
  - o Given the contextual and operational concerns of Shelter/NFI Sector/Cluster members operating cross-border, all identifiable information (organization name and location beyond the sub-district level) will be kept with the Shelter/NFI Sector/Cluster Coordinators and IMOs at the Southern Turkey hub level to minimize the risk regarding safety of the Shelter/NFI Sector/Cluster members, their staff and partners.
- When sharing sensitive information with the Shelter/NFI Sector/Cluster, Shelter/NFI Sector/Cluster members are responsible for classifying the information shared to indicate whether it can be shared and with whom (based on the table<sup>5</sup> at the end of this policy) to ensure that Shelter/NFI Sector/Cluster Coordinators adopt suitable security measures to prevent the information from being compromised or inappropriately disclosed. This applies when sharing information outside of standard information exchanges (eg. 4W or contact details). See table in annex to this Protocol for the classification of standard information types.
- Shelter/NFI Sector/Cluster Coordinators are responsible for extracting and protecting information which cannot be shared, prior to sharing Sector/Cluster information with relevant humanitarian stakeholders (eg OCHA, donors, etc).
- Shelter/NFI Sector/Cluster Coordinators and members have the responsibility to:
  - o Ensure that the identity of individuals and organizations involved in the Shelter/NFI Sector/Cluster will be protected as requested/required by Shelter/NFI Sector/Cluster members, and shared only with the approval of Shelter/NFI Sector/Cluster members
  - o Ensure that when sharing aggregated or disaggregated information from different agencies, individuals or organisations are not identifiable either directly or by summation

**Incident reporting**

All incidents, complaints, breaches of this information sharing protocol will be brought to the attention of all Shelter/NFI Sector/Cluster members for discussion and resolution. If needed, an external interlocutor from one of the inter-sector coordination fora or from the Global Shelter Cluster may be approached to facilitate the discussion and resolution. The resolution of a breach or suspected breach must be agreed to by all members of the Shelter/NFI Sector/Cluster members.

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<sup>4</sup> IASC Operational Guidance on Responsibilities of Cluster/Sector Leads and OCHA in Information Management



<sup>6</sup> Information Type	Information sharing category	Level of anonymisation	Disclosure Protocol
<b>4W data monthly inputs</b>	Internal – Shelter/NFI Sector/Cluster Coordinators/IMOs	Identifiable Organizations	Confidential – not circulated by IMOs until anonymised and data aggregated per the information sharing category
	Internal – Shelter/NFI Sector/Cluster active members	Non-identifiable organizations; all activity info visible; community/village level location; disaggregated population figures	Protected - Shelter/NFI Sector/Cluster active members do not circulate 4W data of the cluster.
	External – UNOCHA IMOs in Gaziantep and/or Amman	Non-identifiable organizations; all activity info visible; sub-district level location; disaggregated population figures	Limited – OCHA at the Gaziantep level will compile all data received and share with all the sectors/clusters at Gaziantep level
	External – WoS Shelter/NFI Sector/Cluster Coordinators and focal point	Non-identifiable organizations; all activity info visible; sub-district level location; disaggregated population figures	Limited - WoS Shelter/NFI Sector IMO will compile and circulate to hub Shelter/NFI Sector Coordinators as well as with the WoS Inter-Sector Group
<b>Shelter/NFI Factsheet - Dashboard</b>	Internal – Shelter/NFI Sector/Cluster Coordinators/IMOs	Non-identifiable organizations; cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – Shelter/NFI Sector/Cluster members may share with the humanitarian community, donors, OCHA, etc.

<sup>6</sup> ACAPS Classification and Anonymisation System  
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	Internal – Shelter/NFI Sector/Cluster members	Non-identifiable organizations ; cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – Shelter/NFI Sector/Cluster members may share with the humanitarian community, donors, OCHA, etc.
	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Non-identifiable organizations ; cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – Shelter/NFI Sector/Cluster members may share with the humanitarian community, donors, OCHA, etc.
	External – WoS Shelter/NFI Sector/Cluster Coordinators and focal point	Non-identifiable; cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – WoS Shelter/NFI Sector focal points may share with the humanitarian community, donors, OCHA, etc
	External - Public	Non-identifiable; cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – Shelter/NFI Sector Coordinators may share with the humanitarian community, donors, OCHA, etc.
<b>Cluster Meeting minutes</b>	Internal – Shelter/NFI Sector Coordinators/IMOs	Non-identifiable organizations (in the drafting of the minutes)	Limited – active members and the meeting attendees
	Internal – Shelter/NFI Sector/Cluster members	Non-identifiable organizations	Limited – member organizations may circulate internally to appropriate persons within their respective organizations
	External – OCHA, NGO Forum, Partnership Initiative or other	Not shared with External – OCHA, NGO Forum, Partnership Initiative or other	Highly limited – not shared



	bodies/organizations	bodies/organizations	
	External – WoS Shelter/NFI Sector Coordinators and focal point	Not shared with WoS Shelter/NFI Sector Coordinators	Highly limited – not shared
	External - Public	Not shared publically	Higly limited – not shared
<b>Ad Hoc Operational meetings minutes</b>	Internal – Shelter/NFI Sector/Cluster Coordinators/IMOs	Identifiable Organizations	Limited – the meeting attendees ONLY
	Internal – Shelter/NFI Sector/Cluster members	Identifiable Organizations	Limited – member organizations may circulate internally to appropriate persons within their respective organizations
	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Not shared with OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Highly limited – not shared
	External – WoS Shelter/NFI Sector Coordinators and focal point	Not shared with WoS Shelter/NFI Sector Coordinators and focal point	Highly limited – not shared



	External - Public	Not shared publicly	Highly limited – not shared
<b>Sector/cluster workplan</b>	Internal – Shelter/NFI Sector Coordinators/IMOs	Identifiable Organizations; figures are presented at the village level	Limited – Only circulated among attendees and/or concerned organizations
	Internal – Shelter/NFI Sector/Cluster members	Identifiable Organizations; figures are presented at the village level	Limited – organizations may circulate internally
	External – OCHA in Gaziantep	Not Identifiable Organizations, figures are presented at the sub-district level	Public – OCHA Gaziantep may share with the humanitarian community, donors, OCHA, etc.
	External – WoS Shelter/NFI Sector/Cluster Coordinators and focal point	Not Identifiable organizations, figures are presented at the sub-district level	Public – WoS Shelter/NFI Sector Coordinators and FP may share with the humanitarian community, donors, OCHA, etc.
	External - Public	Not Identifiable organizations, figures are presented at the sub-district level	Public - Shelter/NFI Sector/Cluster Coordinators may share with the humanitarian community, donors, OCHA, etc.



<b>SAG Products (Strategic Papers, etc.), SRP, HNO, PMR</b>	Internal – Shelter/NFI Sector Coordinators/IMOs	Identifiable Organizations - Activity Information disaggregated - Geographic detail at village/community level	Confidential – not circulated by IMOs until anonymised and data aggregated per the information sharing category
	Internal – Shelter/NFI Sector/Cluster members	Not Identifiable Organizations - Activity Information disaggregated - Geographic detail at Sub- district level	Public – Shelter/NFI Sector/Cluster members may share with the humanitarian community, donors, OCHA, etc.
	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Not Identifiable Organizations - Activity Information disaggregated - Geographic detail at Sub- district level	Public – OCHA Gaziantep may share with the humanitarian community, donors, OCHA, etc
	External – WoS Shelter/NFI Sector Coordinators and focal point	Not Identifiable Organizations - Activity Information disaggregated - Geographic detail at Sub- district level	Public – WoS Shelter/NFI Sector Coordinators and focal point may share with the humanitarian community, donors, OCHA, etc
	External - Public	Not Identifiable Organizations - Activity Information disaggregated - Geographic detail at Sub- district level	Public – Shelter/NFI Sector/Cluster Coordinators may share with the humanitarian community, donors, OCHA, etc.



<b>Assessments and reports</b> <sup>7</sup>	Internal – Shelter/NFI Sector Coordinators/IMOs	Not anonymised unless member sharing provides an anonymised version	Limited – circulated to Shelter/NFI Sector/Cluster members and uploaded to the Shelter/NFI Sector/Cluster dropbox
	Internal – Shelter/NFI Sector/Cluster members	Not anonymised unless member sharing provides an anonymised version	Limited – organizations may circulate internally
	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Not anonymised unless member sharing provides an anonymised version	Highly limited – not shared without consent
	External – WoS Shelter/NFI Sector Coordinators and focal point	Not anonymised unless member sharing provides an anonymised version	Hightly limited – not shared without consent
	External - Public	Not anonymised unless member sharing provides an anonymised version	Highly limited – not shared without consent
<b>Email communication</b>	Internal – Shelter/NFI Sector Coordinators/IMOs	Not anonymised – communication between the Shelter/NFI Sector/Cluster Coordinators or bilaterally with individual members is not anonymised.	Confidential – not shared beyond the sector/cluster coordinators
	Internal – Shelter/NFI Sector/Cluster members	Non-identifiable organizations – Shelter/NFI Sector/Cluster Coordinators blind close copy (bcc) all communication to the Shelter/NFI Sector/Cluster; disclosed emails may be permitted exceptionally in such cases as thematic follow-up discussions or action points agreed upon by specific members	Limited – organizations may circulate internally

<sup>7</sup> Assessments refers to assessments/surveys carried about by individual Shelter/NFI Sector/Cluster members or a small group of Shelter/NFI Sector/Cluster members, Large scale, multi-agency and multi-sector/cluster assessments may be bound by different sharing standards.





	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Not anonymised	Limited, organizations may circulate internally
	External – WoS Shelter/NFI Sector Coordinators and focal point	Not anonymised	Limited, organizations may circulate internally
	External - Public	Not anonymised	Public, may be widely shared
<b>Shelter/NFI Sector/Cluster member contact information</b>	Internal – Shelter/NFI Sector Coordinators/IMOs	Shelter/NFI Sector/Cluster members provide Shelter/NFI Sector/Cluster Coordinators with appropriate contact information	Confidential – not shared
	Internal – Shelter/NFI Sector/Cluster members	Not shared without the consent of the organization – Shelter/NFI Sector/Cluster members may request to be put in touch with specific sector/cluster members. Shelter/NFI Sector/Cluster Coordinators would first confirm with the organization before linking the two	Highly limited – not shared without consent
	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Not shared without the consent of the organization - OCHA may request to be put in touch with specific sector/cluster members. Shelter/NFI Sector/Cluster Coordinators would first confirm with the organization before linking the two	Highly limited – not shared without consent



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	External – WoS Shelter/NFI Sector Coordinators and focal point	Not shared	Highly limited - Not shared
	External - Public	Not shared	Highly limited - Not shared