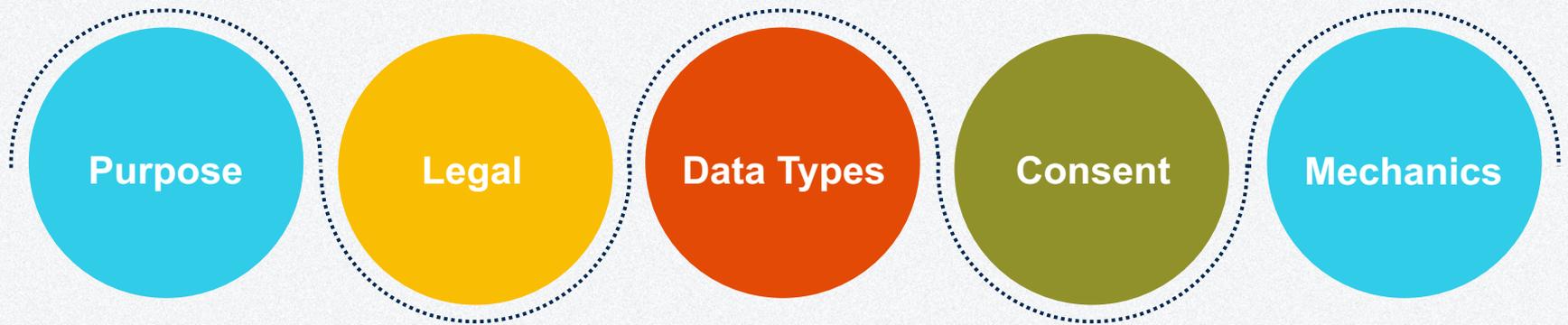


Data Sharing Guidance

**Data is not inherently
bad or good, but it is
also not neutral.**

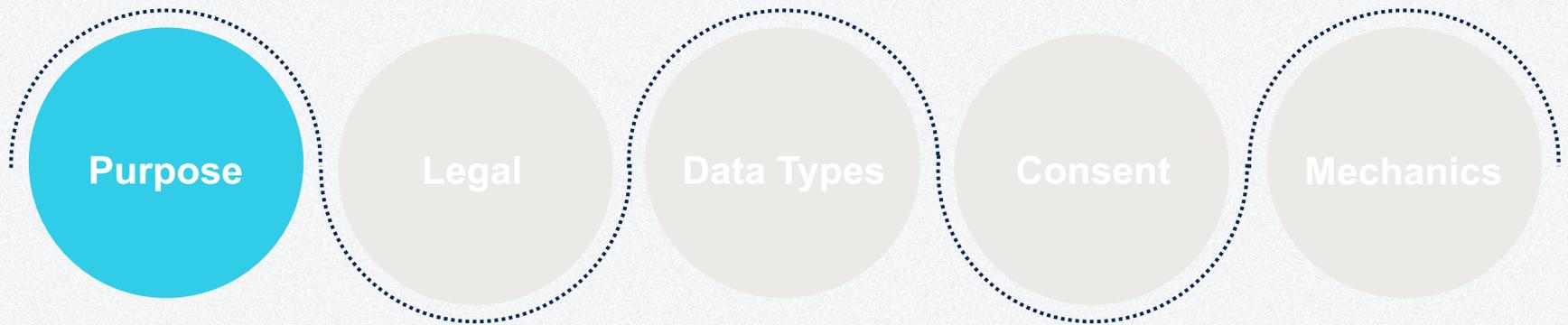
Elements to Consider before Sharing Data with Partners



Here are five data sharing elements to consider before sharing data with partners. Having clarity on these elements does not magically make data sharing happen, but they clarify critical issues to address before data sharing can occur in a wise manner. Sometimes it's very straightforward and simple, other times it's a lot more complex. However, there is no one right way to do it, but doing it without thinking about these factors seems to end up in extra headaches to resolve.

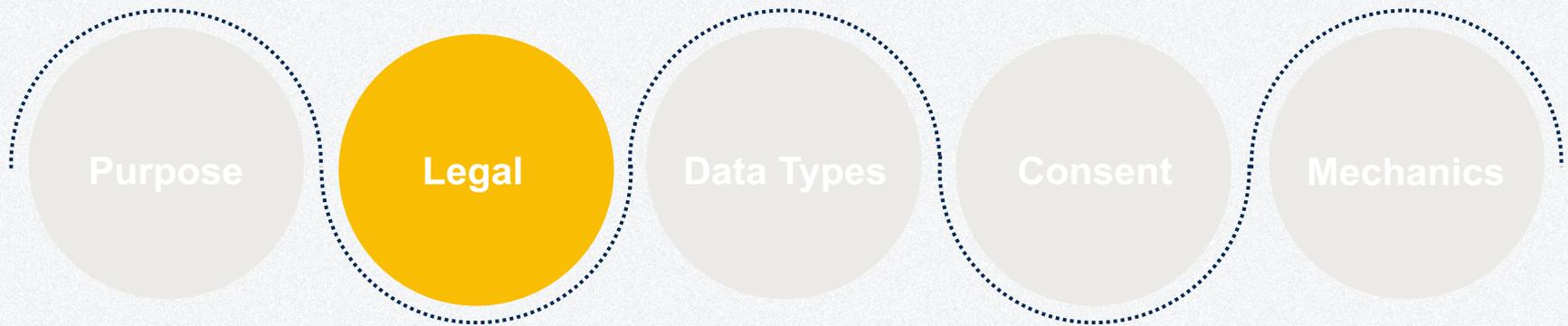
Data Sharing must balance individual and collective rights

Elements to Consider before Sharing Data with Partners



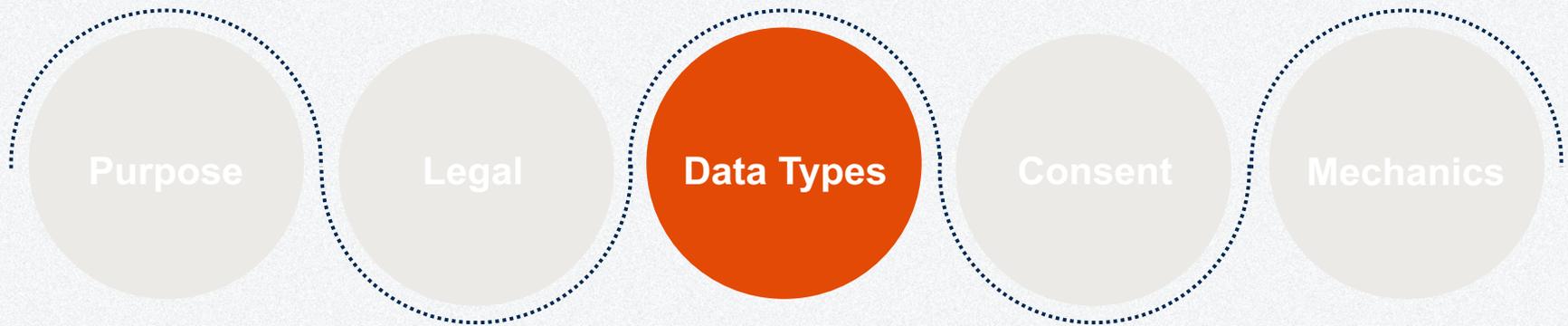
Purpose – We need to be clear on our why and the end goal that we are seeking – this needs to be more than just because it’s a good idea – be as specific as possible. Why are you sharing beneficiary data? What are you trying to achieve by sharing the data? When the data was originally collected what was the original purpose and is sharing the data in line with that purpose? What are the potential harms (short term and long term) that could come from sharing the data? What is your ‘partner’ going to do with the data? How long will they have access to it? Keep it? When will it be deleted.

Elements to Consider before Sharing Data with Partners



Legality – are you legally allowed to share the data you are being asked to? It is good practice to involve your legal team in this. However, in general, different countries and organisations have laws and policies around sharing sensitive data. It is good practice to follow them. Understand where the data will travel. For example, if it will leave the country in which the beneficiary resides, ensure your legal team knows this. In short, don't assume the legality has been checked.

Elements to Consider before Sharing Data with Partners

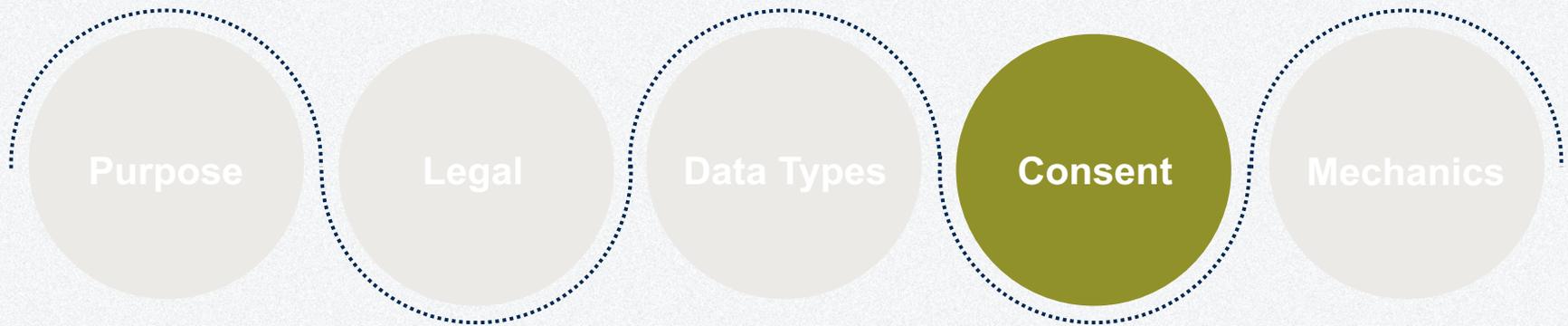


Data Types - what data are we sharing? Is any of the data about people? Is any of the data considered sensitive by the community or by a legal framework? The type of data it is has implications on how we need to treat it. For instance, the when the data is about people or considered sensitive, we should share it less and how we share it should be more restrictive. There are three broad categories of data:

1. **Non-Sensitive Data** – data that has no connection with people or public data
2. **Uncertain Sensitive data** – anonymised data; due to the power of analytics and the availability of data most anonymised datasets can be 'un'-anonymised quite easily
3. **Sensitive Data** – data about people; personally identifiable data.

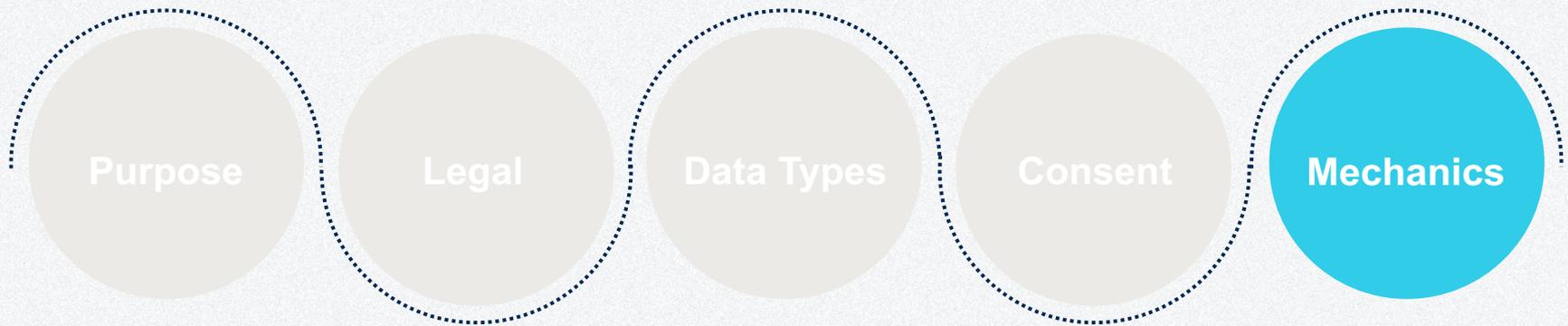
Wherever possible, involve the beneficiaries in determining how to classify the different data you collect.

Elements to Consider before Sharing Data with Partners



Consent – Assuming you have already collected the data, double check what consent was collected from the beneficiary. At minimum, check to see you have their consent to share their data with a partner. If this is not explicit, then you need to go back to the beneficiaries to request it. And always be aware of the 'power' you have as an organisation, so don't just 'ask' for their consent, go out of your way to ensure they understand what they are consenting to. Check and double check their understanding before you consider you have their consent.

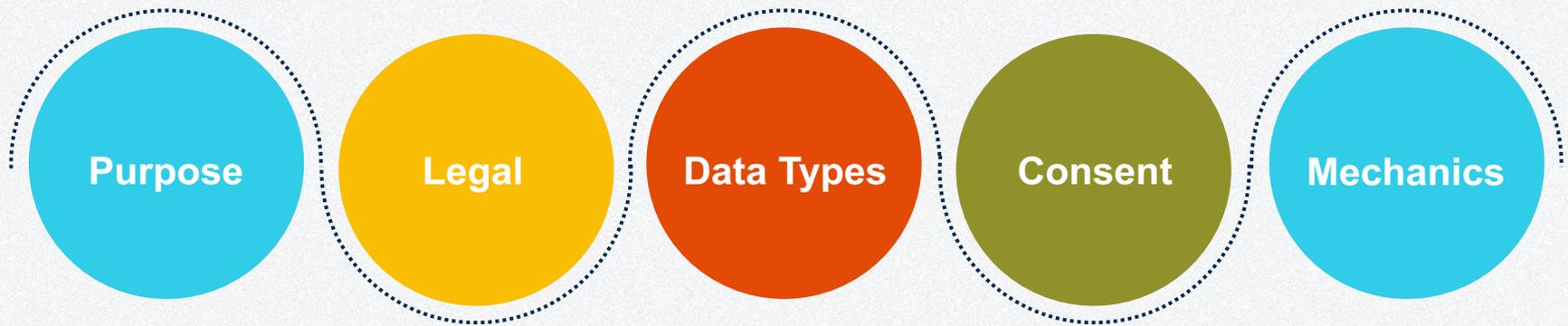
Elements to Consider before Sharing Data with Partners



Mechanics – This is all about the how you actually share the data. Critically, your how must be linked to your why. And ideally, you are not sharing any sensitive data or at least the bare minimum. A good practice is to hold the shared data in 'place' in a 'common place' so that it is not in the 'control' of one organisations. But rather in a collective. (If it's deduplication you are trying to achieve, see [here](#).)

Also with Mechanics, you need to consider Direction, Frequency, and Method. So is the data flowing one way, two way, or multidirectional? Is the sharing a one off, every Friday at 3pm, or in real time? And then the method. **Never** send the sensitive data over email. Are you going to use USB sticks? Secure and encrypted cloud folders? Zero Knowledge Proofs? And critically, whatever method you use, when and how will the data be deleted from the sharing method (i.e. USB stick) and who will have access to the data 'in transit' and when it is at its destination?

Elements to Consider before Sharing Data with Partners



It is not an exhaustive list, however it should get you thinking and discussing. It assumes that normal privacy impact assessments (**PIAs**) and data protection impact assessments (**DPIAs**) have been conducted. Additionally, it assumes security assessments of the partner(s) IT systems have also been done.

And lastly, decisions like this should **never** be made by one person. Always involve a diverse group of people with diverse backgrounds. Ideally, involve beneficiaries as well.