

TOOL 33

Sample information-sharing protocol

Protection Cluster Information-Sharing and Data Confidentiality Protocol,

Turkey Cross-Border Operations

Overview

According to Inter-agency Standing Committee (IASC) guidelines, cluster/sub-cluster coordinators “are responsible for generating up-to-date cluster-specific information (for example, contact lists, meeting minutes, standard forms, policy or technical guidance, datasets, needs/gap analysis, etc.) and sharing it with the UN Office for the Coordination of Humanitarian Affairs (OCHA) in order to support inter-sector/cluster data sharing.” In addition, where needed, cluster/sub-cluster coordinators are responsible for “establishing a data confidentiality and privacy policy within their sector/cluster, which ensures that sensitive, personally identifiable datasets are suitably anonymized.”¹ This protocol has been developed in accordance with IASC guidelines.

Purpose

The Protection Cluster, which includes the Child Protection Sub-cluster and the Gender-based Violence Sub-cluster – referred to in this protocol as the Protection Cluster unless otherwise specified – strives to inform all relevant

¹ *IASC Operational Guidance on Responsibilities of Cluster/Sector Leads and OCHA in Information Management.*

humanitarian stakeholders about protection needs, gaps, trends and response in the Syrian Arab Republic. 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,'² the information-sharing protocol prioritizes the safety and security of those who may be identifiable from the information (affected populations, Protection Cluster members, their staff and partners).

In order to achieve a more informed protection analysis and response, the Protection Cluster encourages its members to be proactive in sharing all relevant information with the cluster coordinators to enable regular, credible protection situation/coverage analysis and response monitoring and analysis and recommendations. This is essential to inform both the development and implementation of the Protection Cluster strategy. This approach will make sure to address the partners' implementation needs and risks to other sector/clusters when needed, respecting the information confidentiality agreed through this document. The aim is to ensure inter-cluster response planning and implementation processes at the Turkey operations level, as well as for the broader humanitarian response – that is, for the whole of the Syrian Arab Republic.

To guarantee the safe delivery of protection programmes, the overall approach to dealing with information entrusted to, or originating from, the Protection Cluster is based on the understanding that the work of the Protection Cluster should be open and transparent, except if the nature of the information concerned is deemed confidential.³

The Protection Sector/Cluster recognizes the benefits of information-sharing, including:

- Better triangulation of information and corroboration of evidence
- More 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 a joint analysis
- Building a common understanding of the protection situation
- Better access to resources and lessons learned.

Application

This policy applies to all Protection Cluster partners: Protection Cluster, Child Protection Sub-cluster and Gender-based Violence Sub-cluster coordinators, information management officers (IMOs) and all Protection Cluster members.

² The Sphere Project – Protection Principles, <www.spherehandbook.org/en/protection-principle-1-avoid-exposing-people-to-further-harm-as-a-result-of-your-actions/>, accessed 1 February 2016.

³ This information-sharing protocol does not include specifications for sharing individual case-related data. Information-sharing related to individual cases will be elaborated in standard operating procedures (SOPs) and other relevant documents specific to the sector/cluster/sub-sector/clusters.

Agreed principles and commitments

The Protection Cluster will abide by IASC guideline⁴ on information management, sharing and confidentiality, and operates 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, partners and beneficiaries.

- The Protection 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 Protection Cluster members agree to share information/data related to assessment and monitoring of protection issues, situation and response with the Protection Cluster coordinators for anonymization, consolidation, cluster-specific analysis and preparation of regular information products on behalf of the Protection Cluster as well as for sharing with Protection Cluster members and other relevant humanitarian stakeholders.
- The Protection Cluster coordinators agree to store information and data shared by Protection Cluster members in a secure manner that is clearly articulated to the Protection Cluster members.
- The Protection Cluster coordinators and members agree to utilize/share information in a manner that recognizes the sensitivities associated with this humanitarian response and respects the need for confidentiality, anonymization and approval of Protection Cluster members prior to further sharing of information provided by Protection Cluster members.
 - Given the contextual and operational concerns of Protection Cluster members operating cross-border, all identifiable information (organization name and location beyond the sub- district level), which is not utilized for cluster (internal) operational planning and field-level coordination⁵ will be kept with the Protection Cluster coordinators and information management officers (IMOs) at the Turkey operational level to minimize the risk regarding safety of Protection Cluster members, their staff and partners.
- When sharing sensitive information with Protection Cluster coordinators, Protection Cluster members are responsible for classifying the information shared to indicate whether it can be shared and with whom (based on the table at the end of this policy) to ensure that the Protection 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 (for example, 4W or contact details). See table at the end of this Protocol for the classification of standard information types.
- Protection Cluster coordinators are responsible for extracting and protecting information that cannot be shared, prior to sharing cluster information with

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

⁵ At present, cluster members are sharing identifiable (organizations' names, focal points) and detailed geographic information (below sub-district level) for dignity kit distributions, emergency response planning and referral pathway development. The cluster coordinators anticipate additional operational scenarios, tools and documents, which will practically require de-anonymization and detailed geographic information.

relevant humanitarian stakeholders (such as OCHA, donors, etc.).

- Protection Cluster coordinators and members have the responsibility to:
 - Ensure that the identity of individuals and organizations involved in the Protection Cluster will be protected as requested/required by Protection Cluster members, and shared only with the approval of Protection Cluster members.

Breaches to the protocol⁶

Should there be a breach by any of the participating members (including Protection Cluster coordinators and IMOs) to this information-sharing protocol, a meeting will be called for all members within 10 days to discuss the breach and develop a resolution.

If a meeting is not possible within 10 days or if a resolution cannot be reached, senior management from Protection Cluster participants of coordination agencies should hold a meeting to determine the course of action. If needed, an external interlocutor from one of the inter-sector coordination fora or from the Global Protection Cluster may be approached to facilitate the discussion and resolution.

Protection Cluster members may stop sharing data if the protocol is breached and will inform Protection Cluster coordinators in writing with the reasons for stopping the flow of data. While the matter is being resolved, and if Protection Cluster coordinators are not involved in the breach, it is recommended that Protection Cluster members continue to share data to inform field-level response. The Protection Sector/Cluster consolidated information will not be shared externally until the breach is resolved.

The resolution of a breach or suspected breach must be agreed to by all members of the Protection Cluster.

⁶ Adapted from the *GBVIMS Inter-Agency Information Sharing Protocol*, <www.gbvims.com/gbvims-tools/isp/>.

Information type	Information-sharing category	Level of anonymization	Disclosure protocol
4W data monthly inputs	Internal – Protection Cluster coordinators/information management officers (IMOs)	N/A – Protection Cluster members do not anonymize data information	Limited – not circulated by IMOs until anonymized and data aggregated per the information-sharing category. Only shared with active members of the Protection Sector/Cluster who share 4W data
	Internal – Protection Cluster members	Non-identifiable (coded) organizations; all activity info visible; sub-district level location; disaggregated population figures	Restricted – Protection Cluster members do not circulate 4W data of the cluster
	External – OCHA IMOs in Gaziantep and/or Amman	Non-identifiable (coded) 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 IMOs in Amman for WoS consolidation
	External – Whole of Syria (WoS) protection sector focal points	Non-identifiable (coded) organizations; all activity info visible; sub-district level location; disaggregated population figures	Limited – WoS Protection Sector focal points will compile and circulate to hub Protection Sector coordinators as well as with the WoS Inter-Cluster/ Sector Coordination Group
	External – public	Not shared publicly	Restricted – Not shared
Protection dashboard	Internal – Protection Cluster coordinators/IMOs	Non-identifiable; cluster and sub-cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages in the drafting	Public – Protection Sector coordinators may share with the humanitarian community, donors, OCHA, etc.
	Internal – Protection Cluster members	Non-identifiable; cluster and sub-cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – Protection Sector/ Cluster members may share with the humanitarian community, donors, OCHA, etc.
	External – OCHA in Gaziantep	Non-identifiable; cluster and sub-cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – OCHA Gaziantep may share with the humanitarian community, donors, OCHA, etc.
	External – WoS Protection Sector focal points	Non-identifiable; sector/cluster and sub- sector/cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – WoS Protection Sector focal points may share with the humanitarian community, donors, OCHA, etc.

Information type	Information-sharing category	Level of anonymization	Disclosure protocol
Protection dashboard	External – public	Non-identifiable; sector/cluster and sub- sector/cluster population figures are aggregated and presented at the sub-district level, broad activity information presented as percentages	Public – Protection Sector coordinators may share with the humanitarian community, donors, OCHA, etc.
Meeting minutes	Internal – Protection Cluster coordinators/IMOs	Non-identifiable organizations (in the drafting of the minutes)	Limited – active members of the Protection Cluster who attend meetings and share 4W data
	Internal – Protection Cluster members	Non-identifiable organizations unless otherwise prior approval from organization	Limited – member organizations may circulate internally to appropriate persons within their respective organizations
	External – OCHA IMOs in Gaziantep and/or Amman	Not shared with OCHA IMOs	Restricted – not shared
	External – WoS Protection Sector focal points	Non-identifiable organizations unless otherwise prior approval from organization	Restricted – WoS focal points may not circulate minutes any further
	External – public	Not shared publicly	Restricted – not shared
Training requests and/or invitations	Internal – Protection Cluster coordinators/IMOs	Not anonymized NB: This refers to trainings conducted by the sector coordinators or IMOs	Limited – organizations may circulate internally and request more information from the coordinators
	Internal – Protection Cluster members	Not anonymized NB: This refers to trainings conducted, planned and needed by cluster members	Limited – organizations may circulate internally and request more information from the providing organization
	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Not anonymized NB: This refers to trainings conducted by OCHA, NGO Forum, etc.	Limited – organizations may circulate internally
	External – WoS Protection Sector focal points	Not anonymized NB: This refers to trainings conducted by or through the WoS	Limited – organizations may circulate internally
	External – public	Not anonymized NB: This refers to trainings conducted by or through external actors	Limited – organizations may circulate internally
Protection Cluster member contact information	Internal – Protection Cluster coordinators/IMOs	N/A – Protection Cluster members provide Protection Cluster coordinators and IMOs with appropriate contact information	Restricted – not shared

Information type	Information-sharing category	Level of anonymization	Disclosure protocol
Protection Cluster member contact information	Internal – Protection Cluster members for field-level coordination ⁷	Not anonymized – Organizations’ names and the areas/scope of their work will be shared; geographically at the appropriate level; organizational/service focal points contact information will also be shared	Limited – shared with operationally relevant cluster members, not to be shared further beyond the cluster members per the contact list
	Internal – Protection Cluster members	Not shared without the consent of the organization – Protection Cluster members may request to be put in touch with specific cluster members. Protection Cluster coordinators or IMOs would first confirm with the organization before facilitating the connection	Restricted – not shared without consent
	External – Inter-cluster coordinators	Not anonymized - Organizations’ names, a focal point (contact info) can be shared with relevant cluster coordinators to address non-protection-related issues ⁸	Limited – Protection Cluster coordinators will only share with other cluster coordinators as needed
	External – OCHA IMOs in Gaziantep and/or Amman	Not shared without the consent of the organization – OCHA may request to be put in touch with specific sector/cluster members. Protection Cluster coordinators or IMOs would first confirm with the organization before linking the two	Restricted – not shared without consent
	External – WoS Protection Sector focal points	Not shared	Restricted – not shared
	External – public	Not shared	Restricted – not shared
Assessments ⁹ and reports	Internal – Protection Cluster coordinators/IMOs	Not anonymized unless member sharing provides an anonymized version	Limited – circulated to Protection Cluster members and uploaded to the Protection Cluster dropbox
	Internal – Protection Cluster members	Not anonymized unless member sharing provides an anonymized version	Limited – organizations may circulate internally
	External – OCHA IMOs in Gaziantep and/or Amman	Not anonymized unless member sharing provides an anonymized version	Restricted – not shared without consent from organization(s)
	External – WoS Protection Sector focal points	Not anonymized unless member sharing provides an anonymized version	Restricted – not shared without consent from organization(s)
	External – public	Not anonymized unless member sharing provides an anonymized version	Restricted – not shared without consent from organization(s)

Information type	Information-sharing category	Level of anonymization	Disclosure protocol
Email communication	Internal – Protection Cluster coordinators/IMOs	Not anonymized – communication between the Protection Cluster coordinators or bilaterally with individual members is not blind copied	Restricted – not shared beyond the sector/cluster coordinators
	Internal – Protection Cluster members	Non-identifiable organizations – Protection Cluster coordinators blind close copy (bcc) all communication to the Protection Sector/Cluster; disclosed emails may be permitted exceptionally in such cases as thematic follow-up discussions, task forces, working groups or committees, or action points agreed upon by specific members	Limited – organizations may circulate internally
	Internal – Protection Cluster members for planning or field-level coordination	Not blind close copy – email addresses of relevant Protection Cluster members will be visible to all Protection Cluster members in copy	Restricted – Protection Cluster members do not circulate the non-blind correspondence further
	External – Inter-cluster coordination for planning for field-level coordination[1]	Not blind close copy – email addresses of relevant Protection Cluster members will be visible to all Cluster Coordinators and respective members in copy	Limited – Protection Cluster coordinators will only share with other Cluster coordinators as needed
	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Not anonymized	Limited, organizations may circulate internally
	External – WoS Protection Sector focal points	Not anonymized	Limited, organizations may circulate internally
	External – Public	Not anonymized	Public, may be widely shared
Sector strategy paper	Internal – Protection Cluster coordinators/IMOs	Non-identifiable – broad activity/strategic information presented. Geographic detail at district level	Public – Protection Cluster coordinators may share with the humanitarian community, donors, OCHA, etc.
	Internal – Protection Cluster members	Non-identifiable – broad activity/strategic information presented. Geographic detail at district level	Public – Protection Cluster members may share with the humanitarian community, donors, OCHA, etc.
	External – OCHA, NGO Forum, Partnership Initiative or other bodies/organizations	Non-identifiable – broad activity/strategic information presented. Geographic detail at district level	Public – OCHA Gaziantep may share with the humanitarian community, donors, OCHA, etc.
	External – WoS Protection Sector focal points	Non-identifiable – broad activity/strategic information presented. Geographic detail at district level	Public – WoS Protection Sector focal points may share with the humanitarian community, donors, OCHA, etc.

Information type	Information-sharing category	Level of anonymization	Disclosure protocol
Sector strategy paper	External – public	Non-identifiable – broad activity/ strategic information presented. Geographic detail at district level	Public – Protection Cluster coordinators may share with the humanitarian community, donors, OCHA, etc.
Sector work plans	Internal – Protection Cluster coordinators/IMOs	Not anonymized – Protection Sector/Cluster focal points/ members responsible for certain processes will be named	Limited – circulated to Protection Cluster members and uploaded to the Protection Cluster dropbox
	Internal – Protection Cluster members	Not anonymized – Protection Sector/Cluster focal points/ members responsible for certain processes will be named	Limited – organizations may circulate internally
	External – OCHA IMOs in Gaziantep and/or Amman	Non-identifiable organizations (in the drafting of work plans)	Public – OCHA Gaziantep may share with the humanitarian community, donors, OCHA, etc.
	External – WoS Protection Sector focal points	Non-identifiable organizations (in the drafting of work plans)	Public – WoS Protection Sector focal points may share with the humanitarian community, donors, OCHA, etc.
	External – public	Non-identifiable organizations (in the drafting of work plans)	Public – Protection Sector coordinators may share with the humanitarian community, donors, OCHA, etc.

^[7] Field-level coordination refers to the operational planning and execution of Protection Cluster activities/services – that is, dignity kit distributions, emergency or contingency planning and response, referrals, etc., to facilitate timely and effective response.

^[8] Example: If a Protection Cluster member identifies a gap with non-food items (NFIs) in a specific location, the Protection Cluster coordinators will directly link that member with the NFI/Shelter coordinators without first seeking permission from the reporting cluster member.

^[9] Assessments refer to assessments/surveys carried about by individual Protection Cluster members or a small group of Protection Cluster members; large-scale, multi- agency and multisectoral assessments may be bound by different sharing standards.

^[10] Examples include the Gender-based Violence-Health Strategy Task Force, the Protection-CCxCM Reference Group, Mine Action Reference Group and the Family Tracing Task Force.