

## PROTECTION CLUSTER INFORMATION-SHARING AND DATA CONFIDENTIALITY PROTOCOL TURKEY CROSS-BORDER OPERATIONS

### Overview:

According to IASC guidelines, cluster/sub-cluster coordinators “are responsible for generating up-to-date cluster 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/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.”<sup>1</sup>

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 in this protocol as the Protection Cluster unless otherwise specified - strives to inform all relevant humanitarian stakeholders about protection needs, gaps, trends and 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 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 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 i.e. Whole of Syria.

To guarantee the safe delivery of protection programs, 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<sup>3</sup>.

The Protection 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 protection situation
- Better access to resources and lessons learnt

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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-exposing-people-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/sub-sector/clusters.

### **Application:**

This policy applies to all Protection Cluster partners: Protection Cluster, CP sub-Cluster and GBV sub-Cluster Coordinators, Information Management Officers and all Protection Cluster members.

### **Agreed principles and commitments:**

- The Protection 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, 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 anonymisation, 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 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 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 utilised** for Cluster (internal) operational planning and field-level coordination<sup>5</sup> will be kept with the Protection Cluster Coordinators and 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 (e.g. 4W or contact details). See table in annex to this Protocol for the classification of standard information types.
- Protection Cluster Coordinators are responsible for extracting and protecting information which cannot be shared, prior to sharing cluster information with relevant humanitarian stakeholders (e.g. 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

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

<sup>5</sup> At present, Cluster members are sharing identifiable (organizations' names, focal points) and detailed geographic information (below sub-district) 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 deanonymisation and detailed geographic information.

## **Breaches to the protocol<sup>6</sup>**

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

If a meeting is not possible within ten 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.

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

Information Type	Information Sharing Category	Level of Anonymisation	Disclosure Protocol
<b>4W data monthly inputs</b>	Internal – Protection Cluster Coordinators/IMOs	N/A – Protection Cluster members do not anonymise data information	Limited – not circulated by IMOs until anonymised 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; <b>community</b> level location; disaggregated population figures	Restricted – Protection Cluster members do not circulate 4W data of the cluster.
	External – UNOCHA IMOs in Gaziantep and/or Amman	Non-identifiable (coded) organizations; all activity info visible; <b>community</b> 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 – WoS Protection Sector focal points	Non-identifiable (coded) organizations; all activity info visible; <b>community</b> 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 publically	Restricted - Not shared
<b>Protection dashboard</b>	Internal – Protection Cluster Coordinators/IMOs	Non-identifiable; cluster and sub-cluster population figures are aggregated and presented at the <b>community</b> 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 <b>community</b> level, broad activity information presented as percentages	Public – Protection Sector/Cluster members may share with the humanitarian community, donors, OCHA, etc.
	External – UNOCHA in Gaziantep	Non-identifiable; cluster and sub-cluster population figures are aggregated and presented at the <b>community</b> 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 <b>community</b> level, broad activity information presented as percentages	Public – WoS Protection Sector focal points may share with the humanitarian community, donors, OCHA, etc.
	External - Public	Non-identifiable; sector/cluster and sub-sector/cluster population figures are aggregated and presented at the <b>community</b> level, broad activity information presented as percentages	Public – Protection Sector Coordinators may share with the humanitarian community, donors, OCHA, etc.
<b>Meeting minutes</b>	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 – UNOCHA IMOs in Gaziantep and/or Amman	Not shared with UNOCHA 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 publically	Restricted – not shared
<b>Training requests and/or invitations</b>	Internal – Protection Cluster Coordinators/IMOs	Not anonymised  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 anonymised  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 anonymised  NB: This refers to trainings conducted by OCHA, NGO Forum, etc.	Limited – organizations may circulate internally

	External – WoS Protection Sector focal points	Not anonymised  NB: This refers to trainings conducted by or through the WoS	Limited – organizations may circulate internally
	External - Public	Not anonymised  NB: This refers to trainings conducted by or through external actors	Limited – organizations may circulate internally
<b>Protection Cluster member contact information</b>	Internal – Protection Cluster Coordinators/IMOs	N/A – Protection Cluster members provide Protection Cluster Coordinators and IMOs with appropriate contact information	Restricted – not shared
	Internal – Protection Cluster members for field level coordination <sup>7</sup>	Not anonymised - 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 anonymised - Organizations' names, a focal point (contact info) can be shared with relevant cluster coordinators to address non-protection-related issues <sup>8</sup>	Limited – Protection Cluster Coordinators will only share with other Cluster Coordinators as needed.

<sup>7</sup> Field-level coordination refers to the operational planning and execution of Protection Cluster activities/services i.e. dignity kit distributions, emergency or contingency planning and response, referrals, etc. to facilitate timely and effective response.

<sup>8</sup> Example: if a Protection Cluster members identifies a gap with 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.

	External – UNOCHA 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
<b>Assessments<sup>9</sup> and reports</b>	Internal – Protection Cluster Coordinators/IMOs	Not anonymised unless member sharing provides an anonymised version	Limited – circulated to Protection Cluster members and uploaded to the Protection Cluster dropbox
	Internal – Protection Cluster members	Not anonymised unless member sharing provides an anonymised version	Limited – organizations may circulate internally
	External – UNOCHA IMOs in Gaziantep and/or Amman	Not anonymised unless member sharing provides an anonymised version	Restricted – not shared without consent from organization(s)
	External – WoS Protection Sector focal points	Not anonymised unless member sharing provides an anonymised version	Restricted – not shared without consent from organization(s)
	External - Public	Not anonymised unless member sharing provides an anonymised version	Restricted – not shared without consent from organization(s)
<b>Email communication</b>	Internal – Protection Cluster Coordinators/IMOs	Not anonymised – 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	Limited – organizations may circulate internally

<sup>9</sup> Assessments refers to assessments/surveys carried about by individual Protection Cluster members or a small group of Protection Cluster members, Large-scale, multi-agency and multi-sectoral assessments may be bound by different sharing standards.

		such cases as thematic follow-up discussions, task forces, working groups or committees, or action points agreed upon by specific members	
	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 <sup>10</sup>	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 anonymised	Limited, organizations may circulate internally
	External – WoS Protection Sector focal points	Not anonymised	Limited, organizations may circulate internally
	External – Public	Not anonymised	Public, may be widely shared
<b>Sector strategy paper</b>	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.

<sup>10</sup> Examples of this include the GBV-Health Strategy Task Force, the Protection-CCCM Reference Group, Mine Action Reference Group and the Family Tracing Task Force.



	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.
<b>Sector work-plans</b>	Internal – Protection Cluster Coordinators/IMOs	Not anonymised – 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 anonymised – Protection Sector/Cluster focal points/members responsible for certain processes will be named.	Limited – organizations may circulate internally
	External – UNOCHA IMOs in Gaziantep and/or Amman	Non-identifiable organizations (in the drafting of workplans)	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 workplans)	Public – WoS Protection Sector focal points may share with the humanitarian community, donors, OCHA, etc.
	External – Public	Non-identifiable organizations (in the drafting of workplans)	Public – Protection Sector Coordinators may share with the humanitarian community, donors, OCHA, etc.