
RESPONSIBLE DATA AT OXFAM

Translating Oxfam's Responsible Data Policy
into practice, two years on

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INTRODUCTION

This report, based on interviews with key staff and a review of responsible data-related materials created by Oxfam, aims to help Oxfam understand two questions:

- How is the concept of responsible data perceived within Oxfam?
- How is Oxfam's Responsible Data Policy being implemented in practice, and what are the barriers to its further implementation?

METHODOLOGY

Since Oxfam's Responsible Data Policy¹ was launched in 2015, some practical resources to guide applications have been gathered and developed. The implementation of the policy has been piloted by six projects, each with a different issue focus and in different countries, to establish the support requirements needed to make the commitments in the policy a reality. To review how responsible data issues were relevant in each of these contexts, researchers interviewed one representative of each project, where possible, as well as representatives from a number of other projects who have been drawing on the responsible data tools. The representatives had a role in implementing activities with some responsible data considerations.

Researchers analysed findings from interviews and from a review of Oxfam's internal responsible data guidance documents. Findings have been collated in this summary document, which aims to assess interviewees' perceptions of responsible data as a concept, how it related to their work, and challenges that they faced in implementing it.

Limitations

Any conclusions are made solely on the basis of responses to the interviews, which are based on small sample sizes. They should not, therefore, be seen as indicative.

In most cases, the pilot projects were at an early stage. As a result, interviewees may have been less willing to describe challenges because they viewed the researchers as 'evaluators' for projects that had not yet been completed. To encourage openness, researchers began by emphasising that they were not seeking to evaluate projects' outcomes, but to help identify better ongoing support mechanisms for implementing responsible data processes.

HOW THE CONCEPT OF RESPONSIBLE DATA IS PERCEIVED WITHIN OXFAM

All interviewees were familiar with the concept of responsible data, and felt that it fitted well with Oxfam's organizational values.

As one interviewee put it: *'As an accountable and transparent organization, we should be accountable and respectful to affected communities.'* Respondents highlighted the need to protect individuals' rights when collecting, storing and sharing data about them as a key element of this. This approach to the use of data and technology was clearly informed by a broader awareness of how imbalances in power can affect data collection and use. In particular, they felt that it was essential to ensure that affected communities clearly understand what is being done with their data, and to give them the agency to make informed decisions about its use.

Interviewees also said that responsible data principles had practical relevance to their work. Although some elements in the policy (such as ensuring fully informed consent) were not new to them, they said that the responsible data frame helped them to link those issues to other areas where they had less knowledge (such as how data about individuals is shared with others). In general, they said that awareness of responsible data considerations had made them more aware of the need to make changes in the way that they worked.

Finally, interviewees also said that they appreciated the emphasis on considering data-related questions throughout a project lifecycle

'It concerns capturing essential data, using data protection procedures that we have, putting copies in servers, consent, data capturing, data minimization, confidentiality and security of the database, where it's going to end up.'

Broader adoption of responsible data

However, interviewees also emphasized that awareness of the policy across the organization was still relatively limited, and suggested that more needed to be done to develop understanding among staff. As one put it:

'The policy is there, and some of the key ingredients are being practised, but even so, the knowledge of the existence of the policy and the procedures are not so understood by people on the field.'

Several interviewees expressed uncertainty in understanding how important the Responsible Data Policy is for Oxfam, how it fits with other priorities, and how it fits into existing organizational processes. These issues are described in more detail below.

WHICH RESPONSIBLE DATA PRINCIPLES DO OXFAM STAFF CONSIDER MOST RELEVANT TO THEIR WORK?

Among the responsible data considerations described by interviewees, ensuring informed consent and minimizing the data that is collected were most frequently referred to, and described in the most detail.

Everyone we spoke to had a solid understanding of the importance of informed consent, both in theory and in practice:

'I have seen in my work for other organisations that a photo was taken without the consent of the affected communities, shared, printed on a banner, and this was a big issue for them once they found out. So, it's good to give out detailed briefings about what happens to our data, and to whom it might be shared in the humanitarian sector.'

Meanwhile data minimization (only collecting data that is necessary to undertake a project) appeared to form a core part of most interviewees' work. Interviewees demonstrated particular awareness of the importance of data minimization in unstable political contexts, such as programmes working in Iraq:

'Lots of agencies take copies of IDs, and we don't do that. We just take numbers of IDs so we don't end up with lots of hard copies. That's been our practice from the beginning.'

Interviewees also highlighted two elements of the policy that they felt were important, but knew less about: data storage and data sharing.

POLICY TO IMPLEMENTATION: HOW RESPONSIBLE DATA POLICY HAS AFFECTED PROGRAMMATIC WORK

The Responsible Data Policy has already started to change the way that interviewees think about collecting and managing data. In one key example, an interviewee highlighted how they rethought what information they published concerning their project after talking with other Oxfam staff about responsible data.

Prior to the conversation, they had been publishing information on food reserves in the region complete with GPS coordinates in an effort to be transparent about what they were learning about the region with affected communities.

They explain more below:

'At first, we made [the data] public, as we didn't think it could be very dangerous. After we realized that it could be, we decided to make it private, and we are working on making it private now. I realized after meeting with [Oxfam staff] that this kind of data could be dangerous...'

'I hadn't thought it could be dangerous until I talked with her about responsible data. The conversation helped me in a lot of ways.... I also realized that implementing this type of policy was up to me.'

Most said that they were actively attempting to implement responsible data principles in their projects, using the resources created over the last two years.

For example, one interviewee said that bringing various key responsible data concepts together under one framework around data collection streamlined a project's process and helped to prioritize the main issues to consider:

'Thanks to the Responsible Data Policy, our data collection framework was very well structured and systematic – now we have become much more alert, on several fronts: for the in-depth process, how this is being handled, the access to the data, the confidentiality agreement.'

However, as in the case study above, the real challenge lies in how Oxfam staff begin to practically address these risks – and how they can be supported to do so.

Currently, the Responsible Data Policy allows for a great deal of autonomy by field and programme staff in how it is implemented. In some cases, this gives staff the independence they need to be able to make country-specific decisions that are crucial to the successful adoption of responsible data practices, like identifying what particular data points could be considered as 'sensitive', given the specific country or political context they are working in.

However, it can also make Oxfam's organizational priorities unclear to staff and consultants. For example, one interviewee said that they felt they needed to '*read between the lines to decide what is important*' within the policy, because of a lack of clear parameters and information about how other parts of the organization had dealt with similar challenges.

Implementation gaps

Data sharing represented a particular concern for interviewees, particularly in relation to sharing information with project partners. Oxfam country-specific guidelines affect how procurement processes with tools providers take place – for example, how many companies need to be considered for a particular tender and what agreements or contracts are used, which in turn affects how data-sharing between involved parties takes place. Generally speaking, tools providers would not be able to access the data gathered, but partner implementers would be likely to need access in order to perform their role.

With partner implementing organizations in particular, interviewees described uncertainty about whether they are adhering to established agreements:

'Though they do say that they are going to be responsible, we really don't know what they are doing with the data... I can tell them that they have to use the data in a certain way, but I can't control what they actually do.'

Other issues where interviewees described experiencing particular uncertainty included:

- **Working with consultants:** to what extent do Oxfam's responsible data policies and practices need to be shared; what kind of time investment is necessary to make sure that consultants understand how to implement responsible data practices in their work?
- **Data deletion:** technically speaking, what are best practices for getting rid of data?
- **Data sharing:** almost a step before establishing a data sharing agreement, interviewees mentioned challenges in knowing when it's appropriate to share data

with other organizations and understanding how that fits with other Oxfam policies (e.g. procurement).

REVIEW OF OXFAM'S RESPONSIBLE DATA RESOURCES

Oxfam stores policies and resources related to the Responsible Data Policy on the collaborative document-sharing application Box. When asked where resources related to the policy could be found, interviewees typically referred to the Box folder.

The folder currently contains 62 documents organized into six folders. Documents are predominantly in English, though there is a considerable number in Spanish and some in French. Each folder focuses on one stage of the 'data lifecycle' (a way of conceptualizing the various stages through which data passes during a project).

Table 1: The types of documents included in each folder

Category	No. of resources	Details	Actions needed to use the resource	Practical or background document?
'Read me first' notes	6	Short text documents, one for each folder; designed to introduce the contents of the folder. Each document states what resources are included in that folder, includes a summary of key recommendations for each step in bullet-point form –typically taking the form of questions to ask, or issues to consider. Five of the six documents provide links to external resources – typically frameworks or guidelines created by comparable organizations or private-sector bodies.	Read recommendations and decide which resources are relevant to the project.	Practical
Policies and guidelines	4	In addition to the Responsible Data Policy itself, this includes three sets of guidelines on responsible data handling prepared within Oxfam.	Read policy and decide which elements are relevant to the project.	Background
Checklists	3	This includes sets of questions designed to help organizations conduct a data audit, an information security checklist, and a data sharing checklist from another agency.	Usually ready to be used.	Practical

		Some are designed in a format that is ready to be completed, whereas others are laid out as a series of questions that would need to be modified.		
Templates ready for general use by Oxfam staff	4	These include templates designed for Oxfam staff on informed consent, data sharing and a 'use of data' questionnaire.	Decide which templates are relevant to the work, and fill it out.	Practical
Example documents previously used by Oxfam staff or external organizations	6	These include a data confidentiality agreement, a data handling confidentiality template and data sharing templates. These documents have been used by Oxfam or external organizations, such as the UK government.	Read documents, decide which elements are relevant and duplicate them.	Background
Guides	4	These are largely produced by other organizations and vary widely: this category includes guides on practical questions, such as developing a short-term data repository, as well as broader issues, such as working with children.	Read and transpose relevant elements on to project planning.	Background

Perspectives on content

Interviewees were asked where they would go to find out more about responsible data; most mentioned the policy itself. Oxfam's intranet was mentioned next most often, followed by the Box folder. One interviewee noted that it was impossible to access the Box application in their country because of internet restrictions.

However, it was notable that interviewees appeared not to be familiar with all content included in the Box folder. Several described a desire for more information about responsible aspects of their projects, such as data sharing, despite the fact that the Box folder on this theme contains nine separate resources. It was unclear from the interviews whether this lack of awareness was because of the format of the content, the Box application itself or communication about the responsible data folder.

Interviewees' views on content

Most interviewees described the content as 'comprehensive' and well-structured, and highlighted that it had brought together elements of practice that had previously remained relatively separate from each other, such as informed consent and data sharing.

Although some gaps were identified – such as guidance on storing data in environments where accessing data was less straightforward – **most feedback related to the way in which the information was presented and organized.**

The comprehensive nature of the policy was seen as both positive and negative. In one sense, participants saw it as useful to bring various aspects of their practice together into one place.

However, it was also clear that interviewees felt daunted by the quantity of information in the folder – one interviewee described the sub-folder for data collection alone as ‘huge’ – and felt that processing this information could be a burden on staff:

‘We had to go to 32 documents to learn about the implementation, and it’s a cumbersome exercise.’

While some interviewees had gone through the documents in detail and were able to identify specific gaps, others felt that it was unrealistic to expect all members of staff to do so.

‘The policy is very huge, and it has so many sections and subsections...If there was a checklist for information collection and storage, which people can just pick up without going through it all, that would be more useful.’

Participants made a range of suggestions for addressing this which generally converged around the desire for a document or tool that fitted more closely into their operational workflow.

Several suggested a single document, including a checklist summarising the main tasks they needed to undertake, while others referred to the desire for an operational workplan. They suggested that this could also allow supervisors to monitor implementation across an entire project, and reduce uncertainty about challenges when implementing the policy. Others pointed out that they lacked a tool or format that would allow them to document what actions they had taken for future reference:

‘We want to document it, what we’ve done and what problem we have faced, but the operational plan is missing.’

RECOMMENDATIONS

Initial feedback indicates that staff that have engaged with Oxfam's Responsible Data Policy find it both practically relevant and important.

However, we also found that more work is needed to increase uptake of the policy, and further develop related resources to allow programme staff to apply responsible data principles more closely in practice.

INCREASING UPTAKE

Introducing key responsible data elements into the code of conduct

Ensuring that everyone working with Oxfam was introduced to responsible data as part of their induction would establish a basic, shared understanding of responsible data. In order to keep it brief, this might mean focusing on key responsible data elements rather than going too deep into the policy itself.

Creating an introductory guide

Many of these issues require a base level understanding of, for example, how power, biases and discrimination could be affected by digital data collection. A short and easy-to-understand book could be a good way of educating people on core responsible data issues, so that hopefully they would be able to identify these issues themselves in practice.

From experience with other projects and guides, design of such a guide makes a big difference – something that looks aesthetically pleasing that attracts people to it would be recommended over, say, a simple 2–4 page document that outlines these issues.

Special training for senior management

Senior management could receive training on core responsible data issues, including guidelines on how to encourage people who report to them to move towards implementation. This could also set up a clearer feedback loop of what resources are necessary for different teams, which is especially important given how quickly many responsible data issues evolve over time.

As well as giving senior management the tools they need to encourage their teams to practise responsible data, this would demonstrate to the rest of the organization that responsible data is a key priority for Oxfam.

ENCOURAGING IMPLEMENTATION

Prioritize user-centred design

Almost everyone we spoke to described a desire for usable resources that would support them to implement the conceptual aspects identified through the Responsible Data Policy. One concrete way of doing this would be through solid and robust user design, to come up with resources based on the various core responsible data topics which would fit into existing workflows and meet specific on-the-ground needs.

For example, the structure of the Box folder does not allow a user to differentiate between templates, external guidance, examples from other projects and practical recommendations: a challenge that a user research process could aim to address in more detail.

Creating a single operational checklist

For staff members who are trying to understand core elements of responsible data and how it affects their work, having one place to go would address issues around complexity and not knowing where to look. A single operational checklist could include high-level topics of interest and refer people to other documents if they want to learn more, or if a particular element is more relevant for a particular project.

This could include certain parameters or measures to look out for, to help people judge whether they have done enough on a certain point. In keeping with the general attitude of empowering staff members to use their best judgement and their context-based knowledge, there could be a self-diagnosis aspect to the checklist, and supervisors or managers could be charged with ensuring people who report to them are appropriately translating the checklist items into implementation.

Accountability for implementing the policy

As mentioned above, a challenge that was mentioned is ensuring that all staff members working on a project are aware of, and are implementing, responsible data measures. Building some level of accountability into projects to ensure that there are checks and balances in place could help even this out and make it clear that responsible data is a priority across all projects. This could be done using a checklist, as mentioned above, or by ensuring that all projects have to answer a set of questions to show how they have thought about responsible data in their projects.

Guidelines for country-level implementation

A number of the people we spoke to highlighted particularly challenging situations in the countries they were working in. Developing ways to help staff members contextualize the global guidance, or highlighting particular areas that might need a closer review if being applied in certain settings, could help increase uptake in particularly high-risk or challenging environments.

Given capacity realities, it seems unlikely that each country would develop its own policy – but for people working in particularly challenging countries, having guidance or a framework to help them think through the challenges they face might be a good first step.

'I think that [where I work] is such a particular case that I don't know if a checklist would be helpful and [we need some guidance more specific to our context]. What can we do in case someone tries to get information from you, and how do you secure that from being accessed or shared? We're so far removed from even collecting information.'

Interviewees we spoke to mentioned that the more general guidelines are less useful for them given the particularly challenging environments that they work in; but also that the fact they are in these environments makes responsible data even more of a priority.

NOTES

1 <http://policy-practice.oxfam.org.uk/publications/oxfam-responsible-program-data-policy-575950>

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