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Information Sharing Policy and Guidelines for ADRA Austria and Partners

	Date:	Signature President
Board approval	**28 Feb. 2020**	
Revision 1		
Revision 2		
Revision 3		
Revision 4		
Next: Review:		

Enactment: 28 February 2020

The present Information Sharing Policy is a binding board decision. This policy applies to all our projects abroad as well as in Austria. ADRA Austria monitoring staff in collaboration with the implementing partner is responsible to implement this policy.

All previous handed out guidelines concerning procurement are no more relevant.

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1 INTRODUCTION

This Information sharing Policy aims to define the different categories of information, ADRA Austria generates or adopts and how to use/share information internally within ADRA Austria and with external organizations.

1.1 Scope

This policy covers the sharing of information and the controls used to share such data. It covers all forms of information, whether held and shared in hardcopy or electronic format.

This policy covers the sharing of information with processors or joint data controllers, information is shared and processed with third parties including, but not limited to, project partners, donors, service providers and other stakeholders.

ADRA Austria will take all viable precautionary measures to ensure safety, confidentiality, integrity and availability of all information that is generated/utilized at all times.

1.2 Coverage

This policy covers all aspects of sharing information which are for internal purpose only and essential information to be shared with partners and the network to enhance the quality of work.

2 GOVERNANCE & DUTIES

Responsibility within ADRA Austria lies with the Country Director, ensuring compliance with the law, and providing advice to staff faced with making decisions about information sharing.

All staff are personally responsible for reading, acknowledging and complying with the protocols and procedures contained within this Information Sharing Policy.

Any variation from this Information Sharing Policy's guidance, recommendations and/or rulings lies with the ADRA Austria board of directors.

3 GDPR

On May 25 2018 an EU law called the General Data Protection Regulation (GDPR) came into effect.

It replaced the Data Protection Act 1998 and it gives individuals greater control over their own personal data.

3.1 The GDPR principles

All data collected must be:

1. processed fairly, lawfully and in a transparent manner in relation to the data subject
2. collected for specified, explicit and legitimate purposes and not further processed for unrelated or incompatible other purposes
3. adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed
4. accurate and up to date
5. kept in a form that permits identification of data subjects for no longer than is necessary for the purpose for which the data was collected
6. processed in a way that ensures appropriate security of the personal data including protection against unauthorised processing, accidental loss, destruction or damage using appropriate technical and organisational measures

4 DEFINITIONS

4.1 Information / data

For the purposes of this policy the meaning of information and data are regarded as the same.

4.2 Information sharing

ADRA Austria defines information sharing as a specific set of data being shared within the organization or shared externally with network partners or other entities. This could be done physically, electronically or verbally.

4.3 Sharing

Sharing includes:

- Uploading information to ADRAs website or social media
- Donor communication with E-mail or Post mail
- Direct Email exchange of information
- Direct- or telephone conversation

4.4 Types of Information

ADRA Austria generates/develops different types of information:

Type of Information	Definition
Technical	Information that relates to research, development, engineering, test, evaluation, production, operation, associated or related to projects or program
Financial	All data and statements about the monetary transactions of the organization
Personnel	Pictures and personified data generated while implementing project and working with donors/supporters.
Intellectual	Intellectual property includes inventions, design, strategies and other information concerning core management and leadership of the organization

5 RATIONALE FOR INFORMATION SHARING

5.1 Purpose

The main purpose for sharing of information is the increased efficiency and effectiveness to reach out to the poor and marginalized people ADRA Austria works with. Specifically, this is:

- Being accountable and maintain productive dialog with donors and donor partners
- Enhance partners capacity to use their resources and ADRAs funds as efficient and effective as possible
- Contracting consultants to monitor and evaluate project performance
- Engage auditors to control and verify expenses
- Ensure a structured dialog and feedback mechanism with Partners and Stakeholders for mutual learning

5.2 Conditions for sharing

Type of Information	Kind of Information	Category of information	Use of Information	Level of Authority
Technical	• Narrative report • Evaluation report	• Open • Sensitive	Donors, partners,	Program Officer
Financial	• Bank statements • Financial statements • Audit report	• Sensitive • Sensitive • Sensitive	Public donors Auditors Tax office (donations)	Finance Officer
Personnel	• Beneficiary lists • Attendance lists • Human-interest story • Pictures	• Restricted • Restricted • Sensitive • Sensitive	Name list for internal use only Stories and pictures to Donors with signed consent only, no clear identification by name or exact location	Country Director and deputy
Intellectual	• Risk management • Strategic management • Design thinking • Operational lessons learned • Proposal being developed in a competitive environment	• Sensitive • Sensitive • Sensitive • Restricted • Restricted	Internal use only	Country Director and deputy

Pictures or other information shared must be truthful and not take out of context or taken to make a stronger claim or to stereotype.

6 SHARING INFORMATION

6.1 *Principles for sharing information*

- **Necessary and proportionate**

  When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

- **Relevant**

  Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

- **Adequate**

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

- **Accurate**

  Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

- **Timely**

  Information should be shared in a timely fashion. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore increased risk of harm.

- **Secure**

  Wherever possible, information should be shared in an appropriate, secure way.

- **Record**

  Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

6.2 Enhance transparency – build trust

	What	How	When
Host country Government (ministry or line ministry)	• Project Proposal	• In writing	• At project start
Austrian Embassy in the host country or ADA coordination office	• Project documents • PR material project related	• In writing	• Continuously
Project Partners	• Project documentation • Technical information	• In writing • Verbally at trainings	• During implementation
Direct Beneficiaries	• Answers to their recommendations and complains	• verbally	• During implementation
Other stakeholders	• Best practice documents included as multiplication part in projects	• Brochure/documents published	• In the context of larger projects and as determined with donor

Key strategies for putting transparency and information sharing into practice include:

- Prepare simple materials for sharing information with communities while planning the project and more detailed information from the first days of implementation
- Identify different possible means of sharing information
- Carry out a simple information needs-assessment with community members
- Consider the risks and sensitivities associated with information provision, especially in political sensitive contexts or in regards to personal sensitive data protection
- Support project managers and field-based staff to incorporate transparency and information provision into their daily work
- Include communities as a key stakeholder or target audience
- Monitor whether the right information is being effectively communicated to the right people

6.3 Approval and tracking

Any third-party organisation requesting to share specific operational or project related information generated by ADRA Austria directly or at project implementation level, must first justify the request in writing to the level of authority outlined in 4.2. Once the sharing is approved, information is being shared as follow:

- Unrestricted: no tracking needed
- Sensitive: tracking needed (what, to whom, why, date)
- Restricted: agreed by the ADRA Austria leadership (Country Director / Board) and tracking needed (what, to whom, why, date)

6.4 Referencing for information shared

If the recipient processes and shares information sourced from ADRA, this information needs to be referenced appropriately.

If the information is restricted and confidential, the recipient must be informed on how to treat this information.

6.5 Sharing with Consent

Consent for data sharing is needed from the individual and the ADRA Country Director where:

- Confidential or particularly sensitive information is going to be shared without a clear legal basis for doing so;
- The individual would be likely to object should the data be shared without his or her consent; or
- The sharing is likely to have a significant impact on an individual or group of individuals.

6.6 Sharing without Consent

Consent is not needed to share the following data:

- to help prevent, detect or prosecute crime;
- if needed as part of legal proceedings, to obtain legal advice
- Stories with changed names and without pictures, where the identity cannot be linked to the original person
- Project related documents without personalized partner- or beneficiary data

6.7 Factors to consider

Every staff member is required to ask him/her the following questions before sharing sensitive data

- What is the objective to share information?

- What information needs to be shared?
- Who requires the information?
- What is the information needed for?
- When should information been shared?
- How can we check the sharing is achieving its objective?
- What risk does the data sharing pose? Consider organization and affected individual
- To which political context will the information be shared?

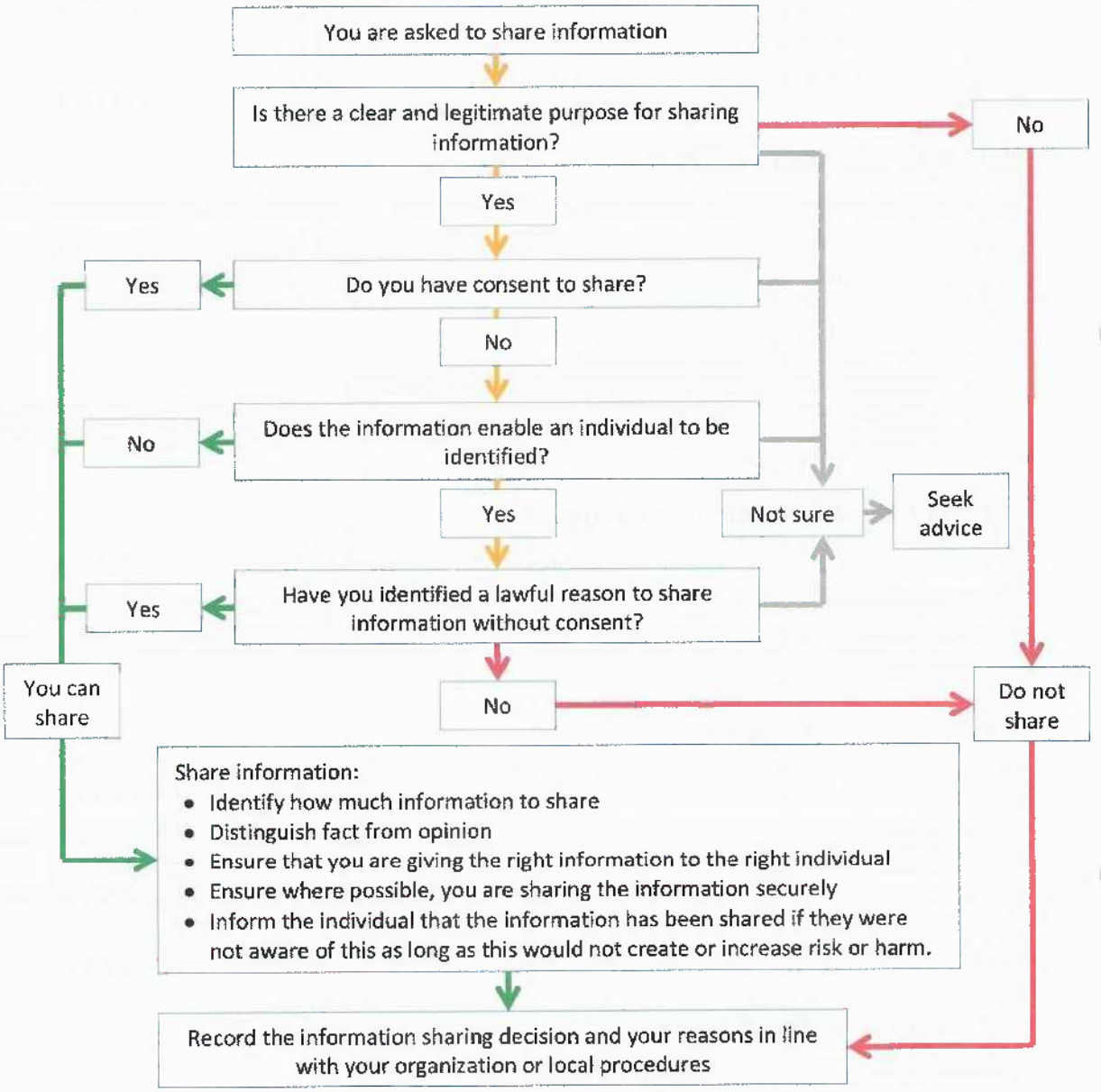

Chart 1: Flowchart of when and how to share personalized information

7 DATA QUALITY

When sharing information, the following governance issues should be considered:

- The information is being screened and does not contain personal data
- The information being shared is accurate before it is shared

- Ways of ensuring inaccurate data is corrected and made sure the old data is deleted
- Staffs are trained so they know who has the authority to share data, and in what circumstances this can take place

8 DUTY TO SHARE

ADRA Austria has the duty to share information as follows:

a) Duty to share personalized financial information to the ministry of finance (donation amount per year, if donor has given consent)
b) Duty to share personalized financial information to the auditing firm
c) Duty to share non-personalized data with ADRA International for licencing purpose
d) Project reports with government donors as per project agreement