

Responsible data management training cycle

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Session 1

The different dimensions of responsible data management

Introduction to the training cycle

About CartONG



Created in 2006, CartONG is a French H2H NGO specialized in Information Management - GIS, MDC and data processing - which aims to put data at the service of humanitarian, development and social action projects.



CartONG is dedicated to improving the quality and accountability of field activities, in particular through better needs assessments and monitoring and evaluation.

We act as a multidisciplinary resources and expertise center, accompanying our partners' strategies and operations.



Our staff and volunteers also support the sector as a whole by producing documentation, building capacities and raising awareness on the technical, strategic and ethical challenges of digital technologies.

h—h
H2H Network
Humanitarian
Action Support


COORDINATION SUD


Principles for
Digital Development

Our action in concrete terms



Supporting field operations

Remote support hotline, tool configuration & implementation, field deployment etc.

Supporting organizational strategies

User needs & IM evaluations, strategic advice, scaling up support, etc.

Capacity Building

On-site & online trainings, mentoring, awareness raising, mentoring etc.

Knowledge Building

Tutorials & toolkits, operational research, case studies, benchmarking, etc.

Context of this training



This training cycle and the associated toolkit were mainly funded by the **Crisis and Support Centre** of the Ministry of Europe and Foreign Affairs (CDCS), with financial support also from HI and Tdh, whom we would like to thank warmly.



This cycle is associated with the "**Strengthening the program data management of Francophone CSOs**" project led by CartONG, and co-financed in large part by the Agence Française de Développement (AFD).



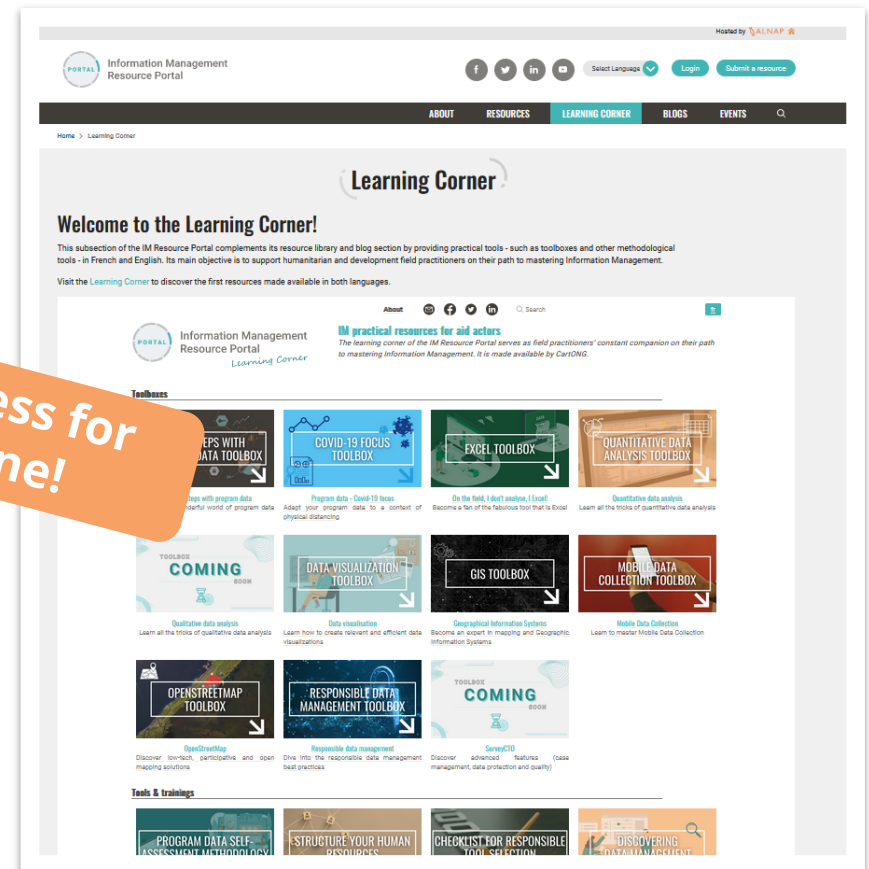
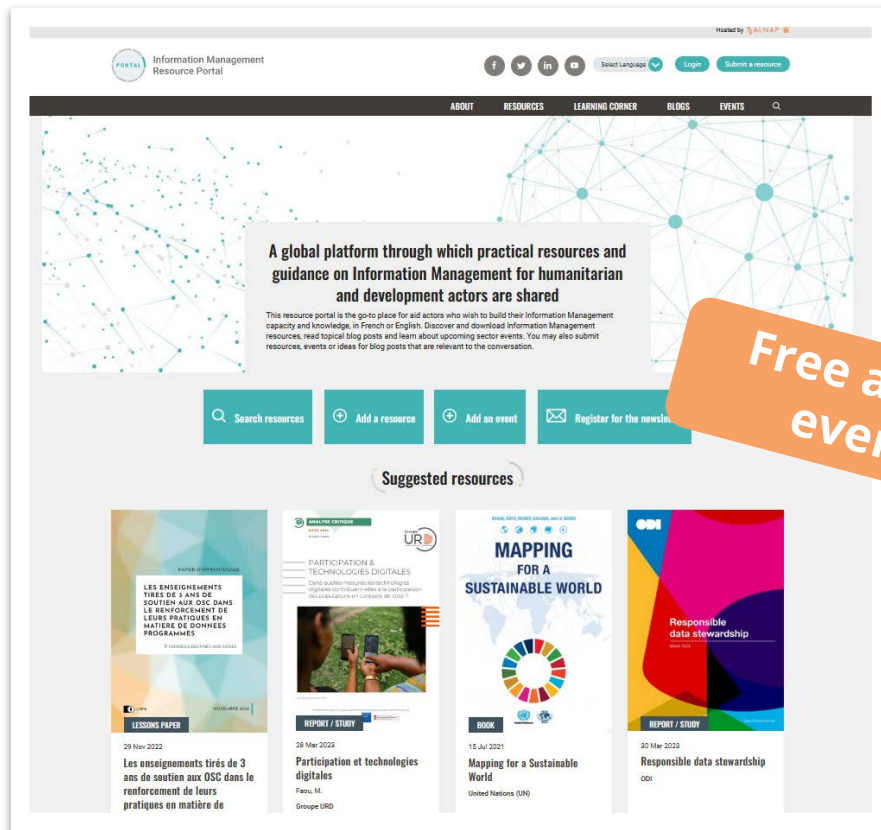
For more information, see the article [presenting the initiative](#) as well as the one giving a summary of the [achievements up to 2022](#).

This support material has been translated with the support of Clear Global with their volunteer team.

A resource portal at your disposal: im-portal.org

A compilation of the **useful resources** published by the sector...

... And its **Learning Corner** with numerous toolboxes and some training modules!



Free access for everyone!

And in particular ...

It's toolbox dedicated to the the topic of **responsible data**:



[Responsible data management](#)

Dive into the responsible data management best practices

Overview of the content of the training



1/ The different dimensions of responsible data management



2/ Focus on data protection



3/ The concepts of responsible data management in action- part 1



4/ The concepts of responsible data management in action- part 2



5/ Discover how current stakes apply to you

Getting to know each other

Trainers' presentation



Maeve de France is responsible for CartONG's information management team

- Maeve has been working at CartONG for 8 years, as a project manager, and has carried out numerous field missions involving implementation or support in data management, mobile data collection, mapping and data protection.
- Since 2020, she has also been in charge of the project to strengthen the practices of French-speaking NGOs in program data management.

Lise Clerc is project manager at CartONG

- Lise has a law degree and spent several years working with exiled populations in a reception center for asylum seekers in France. She then trained in project management and joined CartONG a year ago to work on responsible data management and data literacy.
- She is responsible for the capacity building component of the initiative to strengthen the program data practices of francophone NGOs.



Who are you?

- 180 participants for the anglophone cycle (+13 attending just the first session)
- 131 for the francophone cycle (+18)
- From 61 countries
- From 12 NGOs



Thanks

We would like to thank the **members of the Responsible Data Management working group** for their valuable advice and insights:

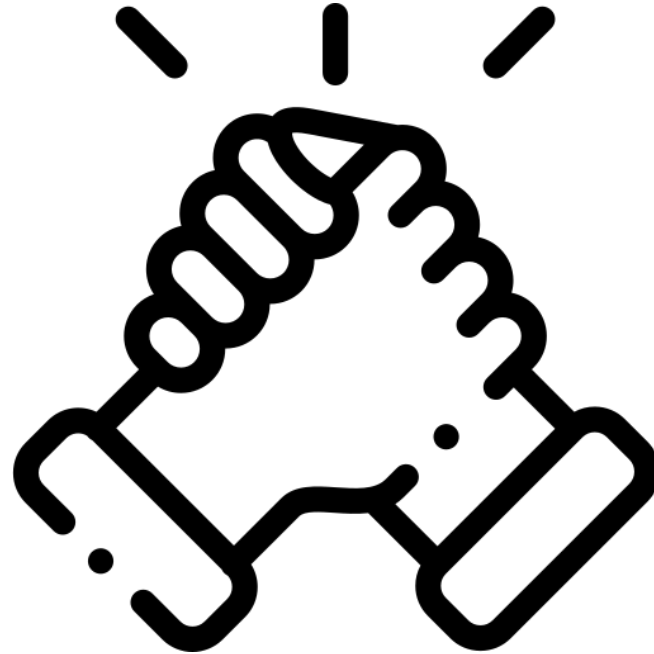
- Mélanie Cras (ACF),
- Florian Pujol (HI),
- Nicolas Lachance-Bernard (Tdh),
- Manon Moreno (SI),
- Emmanuelle Paget Blanc (PUI),
- Antoine Hoguet (PUI)
- Jeremie Dron (MDM).

Thanks also to the NGO HQ staff that have accepted to support us in facilitating breakout rooms!



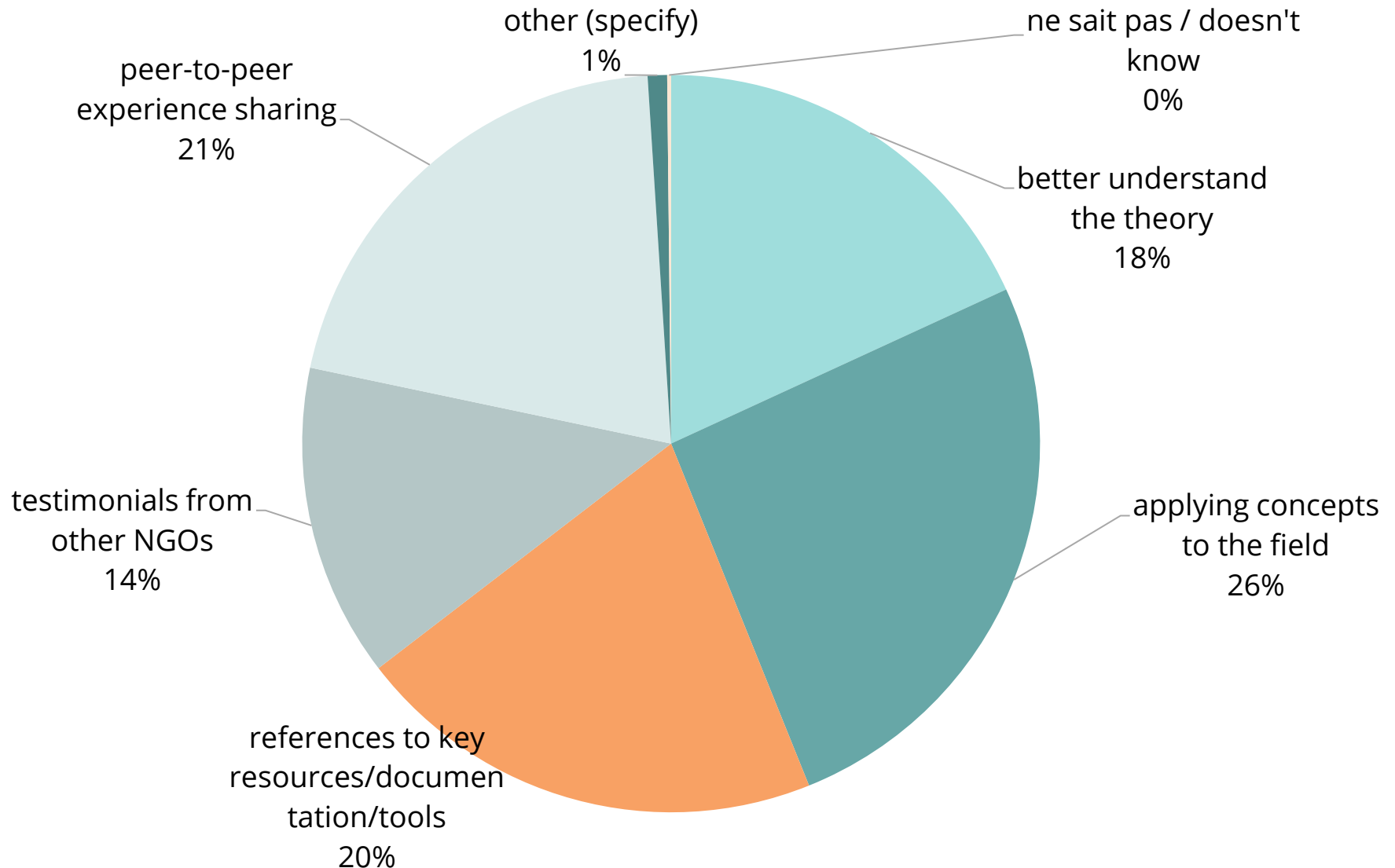
Icebreaker

Get ready to answer a few questions to get to know your fellow participants!



What you want: survey needs analysis

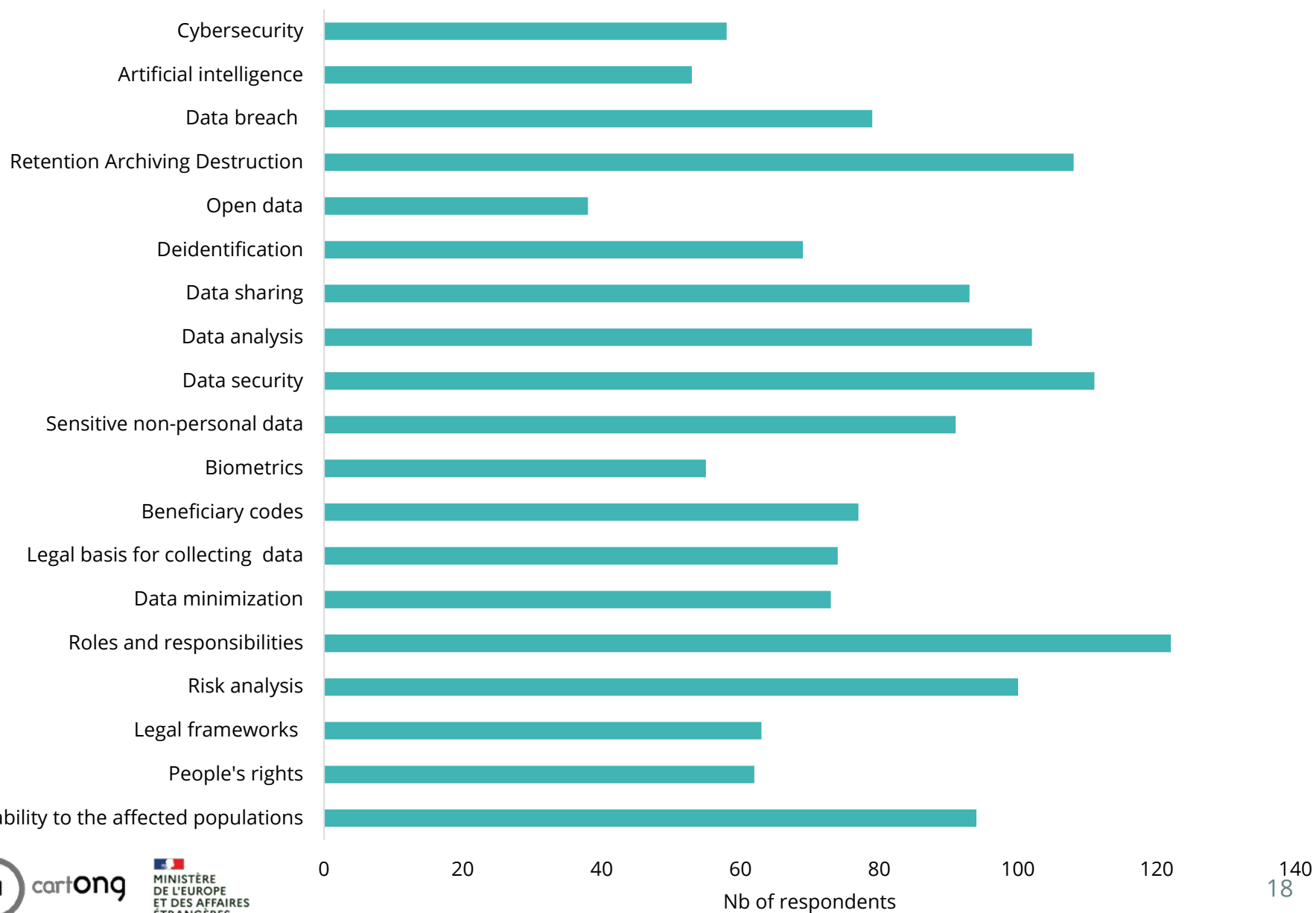
What participants are looking for



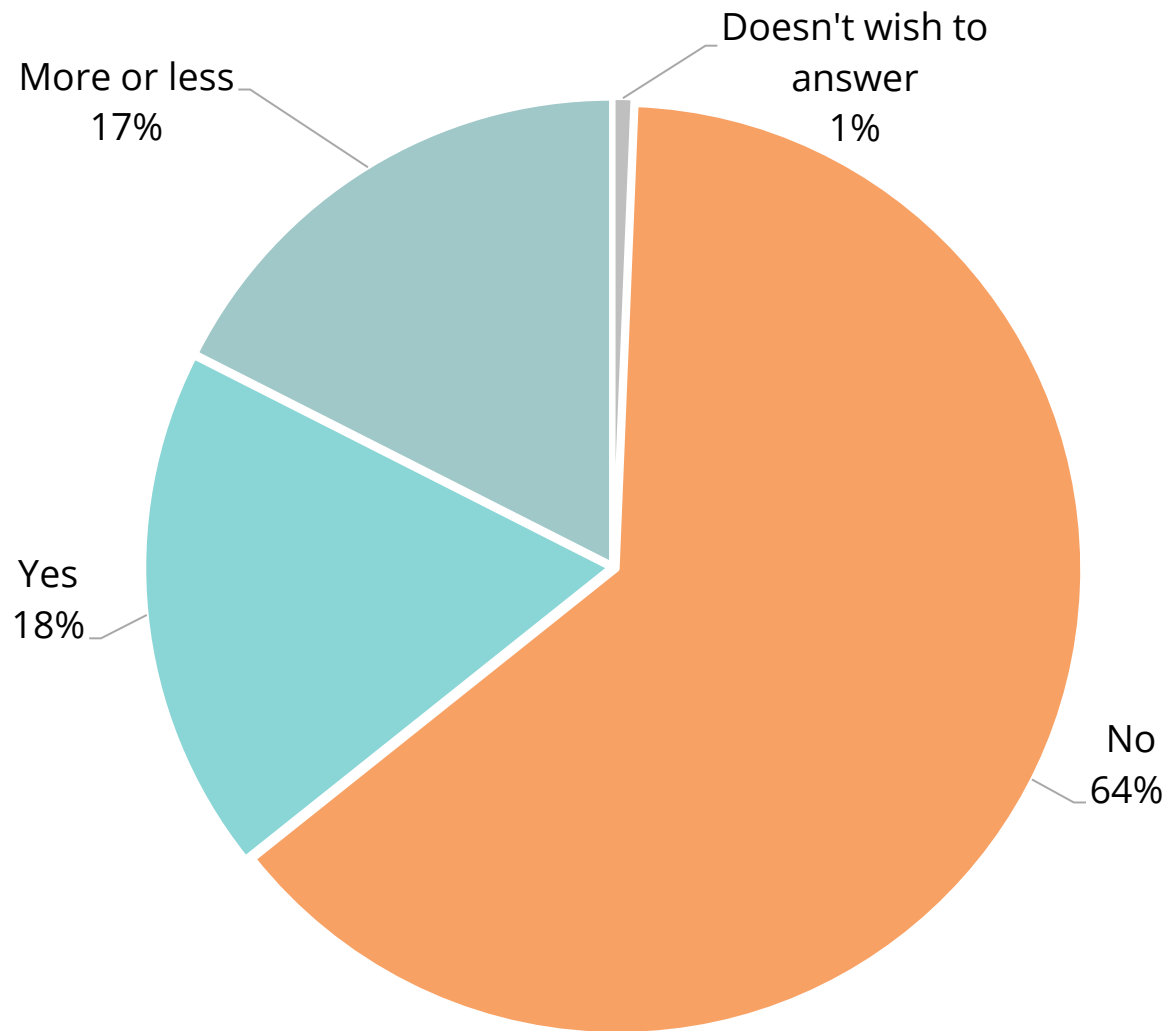
Your number 1 issue of the moment



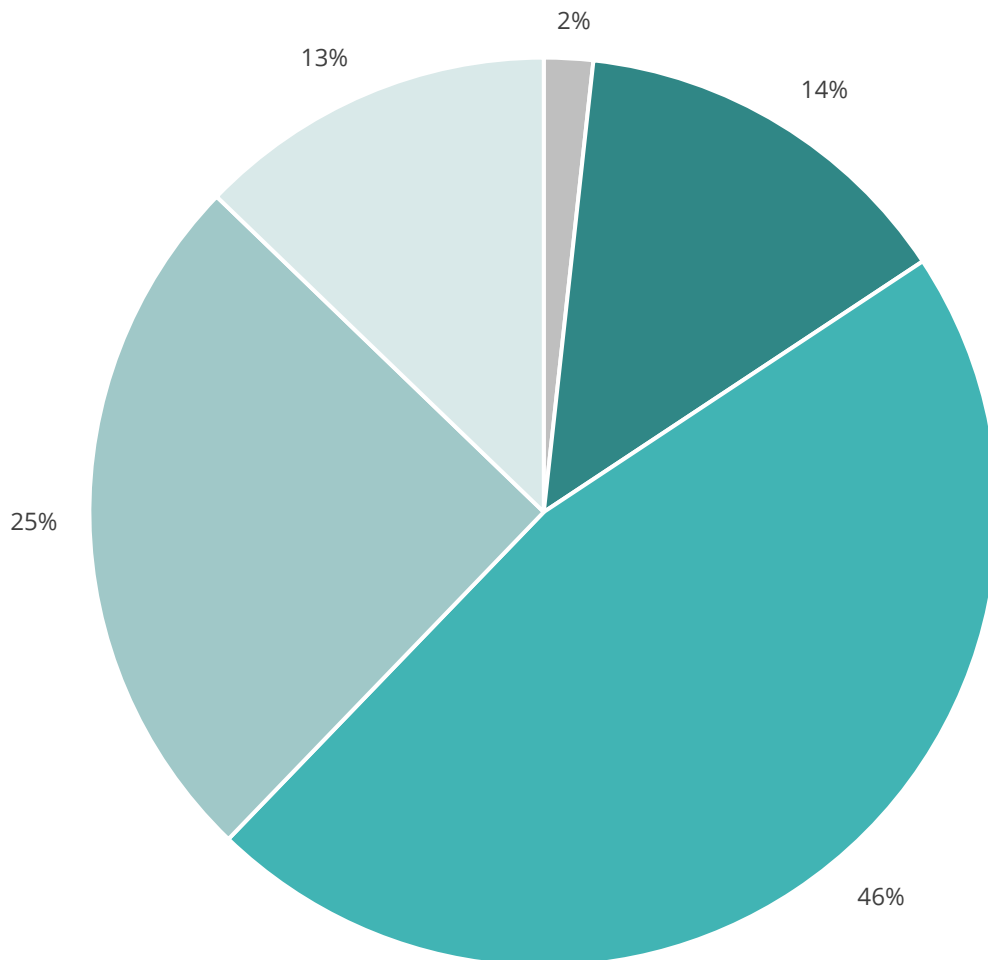
Topics of interest



Already followed a training on the topic of responsible data?



Autoevaluation of your level



- does not wish to answer
- 4- I put these concepts into practice in my day-to-day work, and I feel that I anticipate the risks associated with data management.
- 3- I am familiar with these concepts, and I've adopted a number of good practices on a daily basis.
- 2- I know these concepts, but I don't know how to put them into practice
- 1- I am not familiar with concepts such as personal and sensitive data protection, consent, data minimization and anonymization

What we are offering

Objectives of the training

At the end of the training attendees will:

- Understand why **responsible data practices** are essential to their work,
- Have developed a **good understanding** of data protection and responsible data principles applied to program data,
- Know the **do's and don'ts** to protect data along all the steps of the data cycle, as well as the key resources and tools they can use,
- Get an **overview of the stakes** of the day and how they apply to them.

Training scope and “spirit”

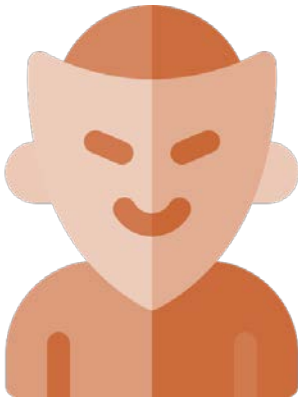
- Scope = **program data**
≠ HR, financial, logistics, individual donor data, etc.
- Given from a “**practitioner**” point of view- breach the gaps between principles and reality
≠ legal / compliance perspective / cyber approach
- Sector “generic” **understanding**
≠ local/ organisational specificities
- Main audience: MEAL/IM coordinators and related **champions!**

The subtitles of the training

- **Engage** the French NGO humanitarian community in a responsible data journey!



Responsible data is only as weak as the weakest link in the organization



- Fight the « **imposter syndrom** » that everyone has on the topic

How will it work in practice

- **5 sessions** of 2,5 hours (for those attending the full training)
- Encouragement for your focal points to **organize a 6th** « internal to your organization » session
- **Homework** (mostly reading) planned between each session
- **Certificate** conditions: presence at all webinars & 70% correct at eval (final certificate will be validated by HQ focal points)
- A **“Constant companion”** will be shared and updated after each session (with Q&A of parked questions, recap of homework...) in the shared participant folder

What we expect from you:

- **Share in the chat and/or break out rooms** your experiences and testimonies. Don't be afraid to ask questions! Peer-to-peer will achieve great things for participant learning



Please be understanding as to the scope covered- keep in mind that **this could also be a 3-week training**, in-person, just for your organization!

- **We want to make this a safe space:** no recording, please do not share outside the training things that could put someone or an organization at reputational risk.



And now...



1/ The different dimensions of responsible data management



2/ Focus on data protection



3/ The concepts of responsible data management in action- part 1



4/ The concepts of responsible data management in action- part 2



5/ Discover how current stakes apply to you

Session 1 agenda

- Introduction to the training cycle
- Why responsible data is a topic
- What responsible data is concretely
 - Group Work
 - Must-know definitions
 - Roles
- Conclusion

The development of this training material is supported by the French Ministry of Europe and Foreign Affairs (MEAE-CDCS). Nevertheless, the ideas and opinions presented in this training do not necessarily represent those of MEAE-CDCS.

From data protection...

1 “Traditional” (and limited) definition

Data protection: **safeguards** for individuals relating to personal data stored on a **computer** (Collins Dictionary)

2 “Control”

This part of the definition can be interpreted very differently in countries where authorities will consider their citizens' data as a means to watch and control their population.

Data protection is about building trust between people and organizations. It's about treating people fairly and openly, **recognizing their right to have control** over their own identity and their interactions with others, and **striking a balance** with the wider interests of society (ICO)

3 OCHA definition

Data responsibility **goes beyond the concepts** of “data privacy” and “data protection”. It entails a set of principles, processes and tools that support **the safe, ethical and effective management** of data in humanitarian response

4 “Operational” definition

Data Responsibility is the responsible processing of data with respect **to ethical standards and principles in the humanitarian context**, bearing in mind potential consequences and taking measures to avoid putting **individuals or communities** at risk. (source: 510)



Because you are faced with some of these

Photos of beneficiaries shared without consent

Beneficiary databases accessible to all the organisation

Recruitment test with a real beneficiary database nearly shared in the area where the recruitment was planned

Beneficiary databases asked by donor and shared by the organisation

Sharing of sensitive data with personal emails

Beneficiary databases of more than 10 years still on server, with no intermediary archiving

Tools that do not sufficiently protect the data used for data collection

Digital versions of the questionnaires are anonymised and secure for the Z research project, but the paper records in the health centres are not, on the nurse's shelf at all times

Personal beneficiary information sent through as part of accounting documents

Testimonies from the survey of training needs



Post it session!

Write one statement on the board, that you have heard from someone of the sector who has questioned the implementation of a good data protection practice. Specify it is from HQ, from coordination level, or at project implementation level.

(Example) Project implementation: « Putting a password on phones used for data collection makes everyone's life more complicated»

We've all heard these before...

I don't have time, I have an emergency to deal with.

It's just an IT issue

Recipients have never been impacted by a data leakage.

This data isn't really sensitive...

But have you heard of these?

I don't have time, I have an emergency to deal with.

A U.S. army soldier scans the eyes of an Afghan resident with an Automated Biometric Identification System during a mission at Turkham, Afghanistan, on Oct. 6, 2011. Photo: Tauseef Mustafa/AFP via Getty Images

THE TALIBAN HAVE SEIZED U.S. MILITARY BIOMETRICS DEVICES

Biometric collection and identification devices were seized last week during the Taliban's offensive.



Ken Klippenstein, Sara Sirota

August 17 2021, 6:11 p.m.

Source: theintercept.com



New Evidence that Biometric Data Systems Imperil Afghans

Taliban Now Control Systems with Sensitive Personal Information



The Taliban control systems holding sensitive biometric data that Western donor governments left behind in [Afghanistan](#) in August 2021, putting thousands of Afghans at risk, Human Rights Watch said today.

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MORE READING

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These digital identity and payroll systems contain Afghans' personal and biometric data, including iris scans, fingerprints, photographs, occupation, home addresses, and names of relatives. The Taliban could use them to target perceived opponents, and Human Rights Watch research suggests that they may have already used the data in some cases.

Source : [Human Rights Watch](https://www.hrw.org)

But have you heard of these?

UNHCR shared Rohingya biometric data 'without consent'

🕒 Jun 16, 2021, 6:33 pm EDT | [Frank Hersey](#)

CATEGORIES [Biometrics News](#) | [Civil/National ID](#) | [ID for All](#) | [In-Depth](#)



The UNHCR improperly gathered personal information and biometrics from ethnic Rohingya refugees and shared it with Bangladesh, which subsequently shared it with Myanmar for its considerations for possible repatriation, reports [Human Rights Watch](#) (HRW).

Source: biometricupdate.com

Recipients have never been impacted by a data leakage.

But have you heard of these?

Ukraine

116
Incidents
↑ 9.4%

17
Sectors
= 0%

16
Actors
↓ 15.8%

- DDoS attacks account for 88.8% of all incidents.
- Most targeted sectors → public administration, media, and ICT.
- Four Ukrainian nonprofit organizations were targeted by DDoS.
- Two incidents attributed to Russian state-sponsored threat actors.
- People's CyberArmy increased their attacks by 72.5%.
- Two new hacktivist collectives identified targeting entities in Ukraine: Solntsepek and Bloodnet.



Source: [CyberPeace institute](#)

Excel: Why using Microsoft's tool caused Covid-19 results to be lost

5 October 2020

Under-reported figures
From 25 Sept to 2 Oct
50,786
Cases initially reported by PHE
15,841
Unreported cases, missed due to IT error

8 days of incomplete data
1,980 cases per day, on average, were missed in that time
48 hours Ideal time limit for tracing contacts after positive test

Source: PHE and gov.uk



The problem is that PHE's own developers picked an old file format to do this - known as XLS.

As a consequence, each template could handle only about 65,000 rows of data rather than the one million-plus rows that Excel is actually capable of.

And since each test result created several rows of data, in practice it meant that each template was limited to about 1,400 cases.

When that total was reached, further cases were simply left off.

Source: [the BBC](#)

But have you heard of these?

CITIZENSHIP

20 People Arrested for 'Homosexuality' While Attending HIV/AIDS Workshop in Tanzania

The government has also recently cracked down on HIV/AIDS health services.

Embed from Getty Images



Source: [Global citizen](#)

Home Office used charity data map to deport rough sleepers

Emails show that deal with Greater London Authority helped it target homeless EU nationals for removal



Source: [The Guardian](#)

This data isn't really sensitive...

WHY is responsible data needed?

1/ It's our mandate as humanitarian NGOs

2/ It's part of accountability to affected populations

3/ It's the law, and donors are also (overall!) pushing

4/ It's unfortunately a growing topic

Humanitarian mandate

- "Do no harm" is to avoid exposing people to additional risks through our action.
- "Do no harm" means taking a step back from an intervention to look at the broader context and mitigate potential negative effects on the social fabric, the economy and the environment.

Source: [HI/F3E](#)



Source : [Sphere](#)

1/ It's our mandate as humanitarian NGOs

Accountability towards affected populations

You can't respect affected populations and not take into account their fundamental right to privacy.

Editor's take: Data responsibility starts with you

'Your facts all come from somewhere, loaded with history, with freight.'

We need to do this stuff better. You're the first line of defence. The values in the data set need to reflect your values.

*(This article is based on a keynote presentation at the **GeOnG conference** on 2 November 2020.)*

2/ It's part of accountability to affected populations

Source: [The New Humanitarian](#)

The legal side

3/ It's the law, and donors are also (overall!) pushing

The subject is **evolving rapidly**, and new laws are emerging every month.

Having a data protection law does not necessarily mean that this law protects people's rights in the sense of the GDPR. On the contrary, some of them may limit individual freedoms or give more control power to authorities.



NGOs are faced with **varying and sometimes conflicting regulatory frameworks and donor requirements**. They will have to make decisions and take risks based on their operational priorities to strike a balance without compromising themselves.

Growing topic

4/ It's unfortunately a growing topic



Targeting

When the location or new information on groups become public, they can become more vulnerable.



Radicalization

Armed organizations could exploit private information to recruit and win over individuals.



Attacks

Data that reveals people's locations make them easy targets for organized crime.



Stigma

Data leaks on the past, politics, or health of groups or individuals could cause reputational damage.



Excommunication

Communities could ostracize individuals based on revealed private information.



Conflict

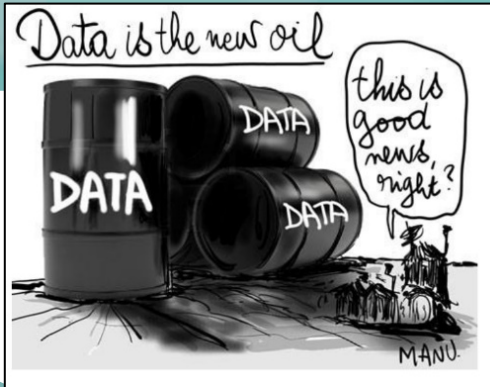
Cultural, political or religious data could incite violence or hatred between rival communities.



Sources: [ICTworks](#) & [Devex](#) & [AAAS](#)

Growing topic

4/ It's unfortunately a growing topic



GLOBAL VIEWS | DATA FOR DEVELOPMENT

Opinion: The WFP and Palantir controversy should be a wake-up call for humanitarian community

Applying it to our digital context

ICT4D
data harm to aid recipients



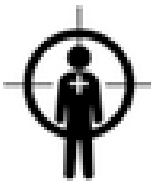
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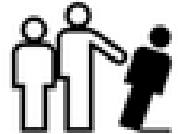
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Growing topic

4/ It's unfortunately a growing topic



Finding the balance between...

Operational Efficiency

Transparency/ donor
accountability (+ fight
against fraud / terrorism)

Innovative data collection
tools for operational
needs

Limited skills and
expertise of program team

Humanitarian principles & legislation

Rights and dignity of
affected populations

Trust of beneficiaries

Confidentiality as a
working method





Field testimony



What it is in more concrete terms

The 4 components of responsible data



confidentiality	security	quality	literacy
<p><i>Confidentiality means that only people who have a need to know and are authorised to use the Personal Data can access it.</i></p>	<p><i>Data security is the technical implementation of what data protection requires, with the prevention of unwanted/non-authorized access to data.</i></p>	<p><i>A common way of defining the quality of data is in relation to its 'fitness for purpose', or the ability with which it can be used to make data-driven decisions. Quality is a multi-faceted concept that includes relevance, accuracy, timeliness, accessibility, and comparability of data.</i></p>	<p><i>Data literacy is the ability to read, work with, analyze and communicate with data</i></p>



Group exercise !

- Take up the keyword that was attributed to your group
- Come up with a sentence describing **why it is part of a responsible data approach**
- Place it in the category that you think it corresponds to

Debrief of the exercise



Data literacy in practice

DATA LITERACY
is described as



the ability to read,
work with and
analyze, argue
with data.

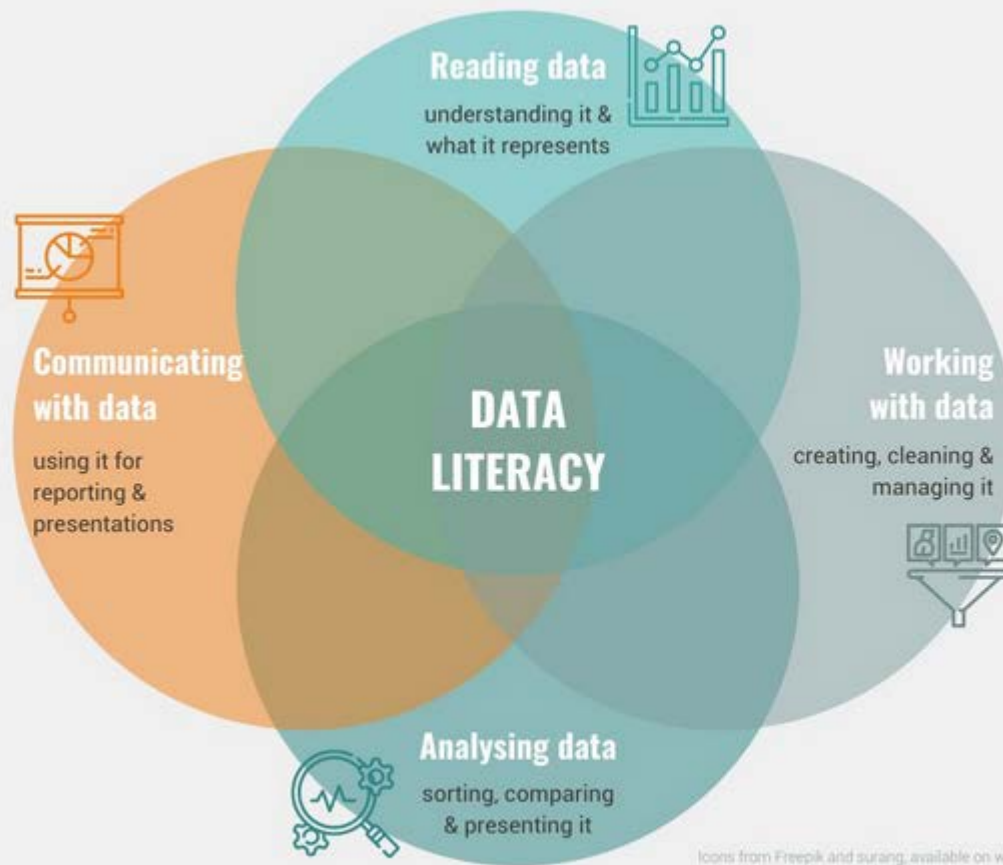


Illustration by CartONG, adapted from [VENNGAGE](#), Lydia Hooper

Source: [IM resource portal CartONG blog post](#)

Therefore:

Digitally Securing Your Organisation Is Like Preparing Your Office For A Fire



Digital security is often understood as a **personal** action – but for healthy digital security practices to be effective, they have to be **shared**. Like fire safety, you can think about digital security at different levels:

- ∇ Within an institution's infrastructure: ensuring your operational infrastructure is secure, from email hosting to finance software.
- ∇ Understanding different levels of response: different levels of digital security threats require calling different experts (external, or in-house)
- ∇ Culture and knowledge: building up literacy around digital security on an ongoing basis, to develop a culture that prioritises security and safety.

First published March 2018. Created by The Engine Room with support from the Ford Foundation. Illustrated by Jason Li. This work is licensed under a Creative Commons Attribution NonCommercial 4.0 International License. ©@@

Source:
[The Engine Room](#)

Must-know definitions

Type of actions considered data processing

Almost anything you do with data counts as processing including :

- Collecting
- Structuring
- Analyzing
- Combining
- Using
- Recording
- **Consulting**
- Disclosing
- Disseminating
- Storing
- Deleting ...
(ICO/ICRC)



Probably a lot more than you thought!

Personal data

This (PII- Personal Identifiable Information) is any **information** relating to a **natural person who can be identified**, directly or indirectly.

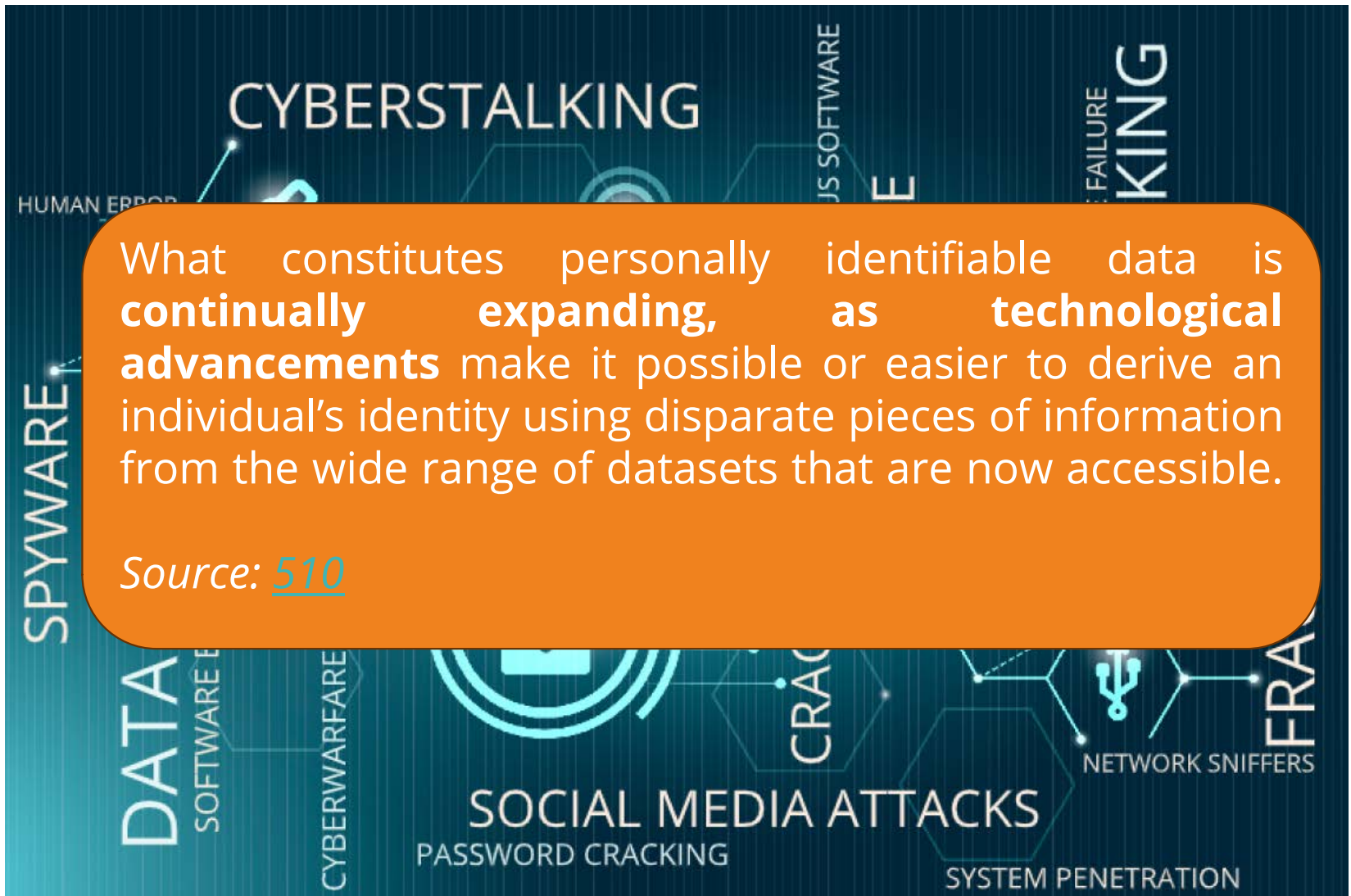
More precisely it includes:



- A name, a picture, voice recording, fingerprint or iris scan,
- A postal or email address, GPS location
- A phone or email address,
- An ID number, License plate number,
- An IP address, a login,
- A voice recording, etc.

If you share a print screen of a Kobo map of survey results concerning populations in need after an earthquake, with a GPS location of each household, it can be considered personal data

And...



Sensitive personal data

They require a **higher level of protection** because the **consequences of misuse would be more serious, potentially harming** fundamental rights of the people.

According to GDPR, they are personal data revealing:

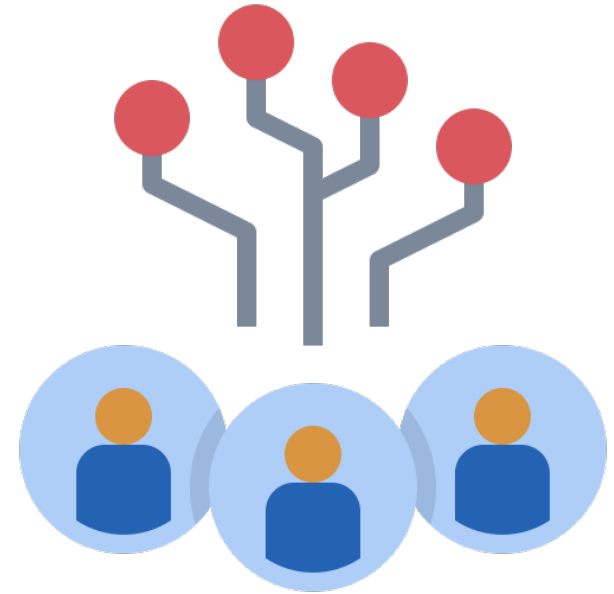
- **Racial** or **ethnic** origin,
- **Political** opinions,
- **Religious** beliefs or **philosophical** inclinations,
- **Trade union** membership,
- **Sexual** life and orientations,
- **Criminal** allegations, proceedings or convictions.



And also **genetic information**:

- **Biometric data** if used for the purpose of identification,
- **Health data** (*data on physical or mental health of any kind, such as HIV or TB status, addictions, diseases, birth control methods, disabilities, medical treatments, allergies*).

Demographically or Community Identifiable Information (DII/CII) is data that can be used to identify a **community or distinct group**, whether geographic, ethnic, religious, economic, or political.



This is rarely covered in legislation, but as humanitarian NGOs you often have to think beyond « PII », in particular in contexts of conflict or a discriminatory environment, as it can entail specific measures!

And what about non personal sensitive data?

You can also have **non personal sensitive data** concerning your organisation's activities (presence in an area, security incidents, medical infrastructure location...)

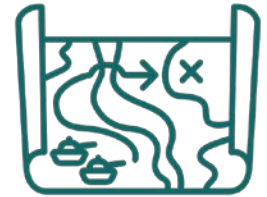


A simple base map of an area can become sensitive information!

And of course

The level of **sensitivity** of any of this data obviously **increases** with:

- the **context** (country where there is state-enforced repression or armed groups etc...)
- **type of populations** (children, people with disabilities, health problems, people with a very high level of vulnerability...)
- **activities of your NGO** (if they are linked to any type of discrimination, but also to the « neutrality » component of humanitarian action such as medical support, to cash etc...)



What are the roles behind responsible data?

Actors in data processing

① Natural person or Data subject

Technical term for the person to whom particular data relate.

A natural person (i.e. an individual) whose **personal data is being processed**, who can be **identified, directly ou indirectly**, by reference to that data.

E.g. Program beneficiaries and employees.

Actors in data processing

2 Data controller

Refers to the person or organization that, alone or jointly with others, determines the **purposes and means of processing personal data** (ICRC).

E.g. An INGO who has set-up from A to Z a project with affected populations

A data controller decides how and why to collect and use data, and is in charge of the associated risk assessment, in charge of data breach notification etc.



3 Data processor

Refers to the person or organization that **processes personal data on behalf of the data controller** (ICRC), and in accordance with its instructions.

E.g. A local partner who has activities for which it handles data (collects, cleans, analyses it...) on behalf of operational NGOs partners is their data processor. Some donors consider NGOs as data processors

Data processors have some direct legal obligations, but these are more limited than those of the controller (mainly an alert, assistance and advice role)



Actors in data processing

4 Joint Data controller

If 2 or more data controllers jointly determine the purposes and means of processing the same personal data, they are joint data controllers.

However, they are not joint data controllers if they process the same data for different purposes.

*NB: This situation may exist in consortium programmes.
Or more simply between an INGO and its local partner.*



5 Third-party data processor

A person or organization contracted in their own name by a subcontractor to process data for a partner.

E.g. The contracting of consultants by an INGO to work on a project.

6 The Data Protection Officer

He/she assists an organization to monitor internal compliance, inform and advise on your data protection obligations, provide advice regarding Data Protection Impact Assessments (DPIA) and act as a contact point for data subjects and the supervisory authority.

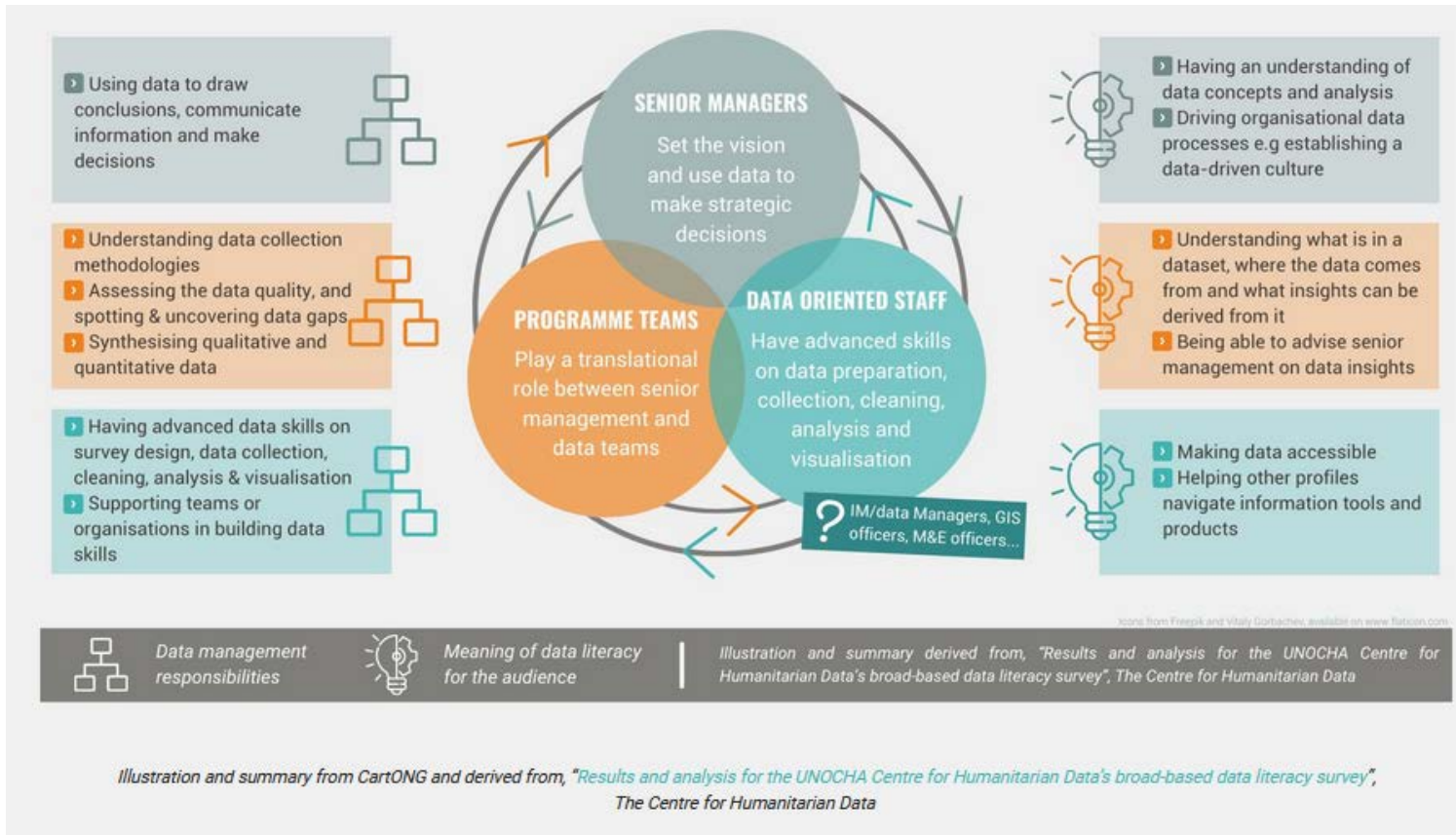
A DPO can be an existing employee or externally appointed. In some cases, several organizations can appoint a single DPO between them. (ICO)

NB: He/she, or the local focal points you may have depending on your set-up, are your key support for data protection situations you may have.



And beyond data protection...

As responsible data management **goes beyond data protection**, there are wider roles to determine, on topics such as data literacy



Source: [IM resource portal CartONG blog post](#)

Question to you

If you have further questions on Roles & Responsibilities, you can add them on the board!



Conclusion

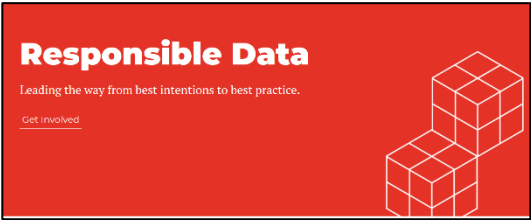
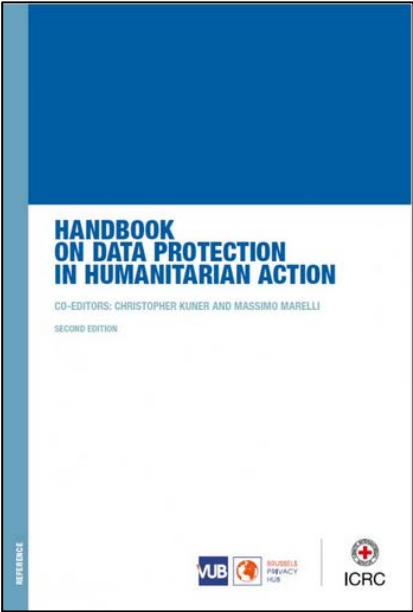
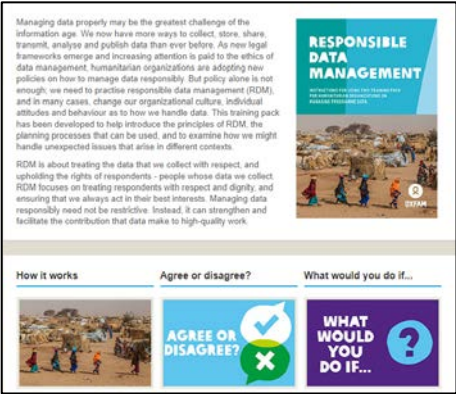
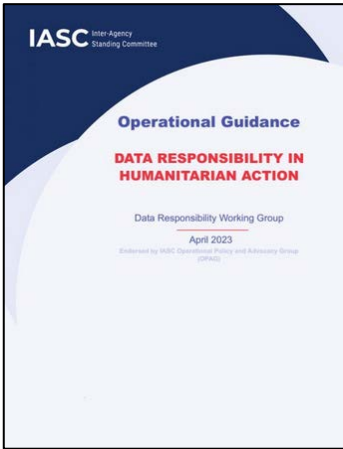
Key messages to remember

- Responsible data is not just a question of confidentiality and security, it is also **a question of data culture and data quality** (and often of common sense...)
- A Responsible data approach is necessary because of your **"do no harm" mandate**, your **accountability to the populations affected and to donors**, and because of the **growing risks posed by new technologies**.
- In our sector, it concerns **personal and sensitive personal** data, but also **demographic/community** data and **sensitive non-personal data**.

The go-to resources

If we had to select 5 sector references

- 2.5.3 Guidance Notes on Data Responsibility in OCHA Humanitarian Action
 - NOTE 1: Statistical Data Disclosure Control
 - NOTE 2: Data Incident Management
 - NOTE 3: Data Responsibility in Public-Private Partnerships
 - NOTE 4: The ethics of humanitarian data
 - NOTE 5: Data impact analysis
 - NOTE 6: Data Responsibility in Money Transfers
 - NOTE 7: Responsible Data Sharing with Funders
 - NOTE 8: Responsible approaches to data sharing



And the latest CartONG toolkit



Available on <https://www.im-portal.org/learning-corner>

As well as a responsible data resource list we will be sharing as part of the training resources!

Organisation	Key doc ?	Title	Type	Link	Date
The Engine Room		The Engine Room website	Website	https://www	
The Engine Room		How to start your responsible data journey	Blogpost / Article	https://www	2021
National Cyber Security Centre		NCSC's cyber security training for staff	Training	https://www	2021
CartONG		Why data literacy is important in the aid sector	Blogpost / Article	https://www	2021
OHCHR		Artificial intelligence risks to privacy demand urgent action	Blogpost	https://www	2021
MERL Tech		New Guides! Responsible Data Governance for M&E in Africa	Practical handbook	https://merl	2022
CMS - GDPR Fines		GDPR Enforcement Tracker	Tutorial / Tips / Tool	https://www	
OXFAM		Biometric and Foundational Identity Policy	Policy	https://oxfam	2021
Responsible Data		Responsible Data website	Website	https://respo	
The Engine Room		RAD planning	Tutorial / Tips / Tool	https://www	2021
ICRC - DigitHarium		Digital Dilemmas Debate #7: Biometrics - 'Overpurposed' by design?	Video	https://www	2021
ICRC		Intro to blog series on human costs of cyber operations	Blogpost / Article	https://blogs	2019
ICRC		Digital risks for populations in armed conflict: Five key gaps the humanitarian sector should address	Blogpost / Article	https://blogs	2019
GIZMODO		Authorities Claim They Accessed Encrypted Signal Chats to Charge Oath Keepers	Blogpost / Article	https://gizm	2022
The Engine Room		Responsible Data Policy	Policy	https://www	
Forbes		Can The FBI Hack Into Private Signal Messages On A Locked iPhone? Evidence Indicates Yes	Blogpost / Article	https://www	2021
ICRC - DigitHarium		Digital Dilemmas Series (Dialogues & Debates)	Video	https://www	2021
The New Humanitarian		The UN's refugee data shame	Blogpost / Article	https://www	2021
ICRC		You can't handle the truth: misinformation and humanitarian action	Blogpost / Article	https://blogs	2021
ICRC		Sophisticated cyber-attack targets Red Cross Red Crescent data on 500,000 people	Blogpost / Article	https://www	2022
Politico		Suicide hotline shares data with for-profit spinoff, raising ethical questions	Blogpost / Article	https://www	2022
Access Now		Access Now website	Website	https://www	

Homework for next week

Homework for the next session



Thank you for your attention!



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