

# Using PIM Principles to Develop Data Sharing Agreements

Regional Information Management Specialist, James Norris, explains how the Danish Refugee Council has used the PIM Principles to develop stronger and more detailed data sharing agreements in Iraq, Jordan, Lebanon, Turkey and Yemen.

James Norris is the Danish Refugee Council's Regional Information Management Specialist for the Middle East region, where data sharing agreements have taken on a much greater importance after the introduction of the General Data Protection Regulation of the European Union (GDPR).

## Need for stronger data sharing agreements

James describes the factors that have led to the development of more detailed data sharing agreements in DRC operations across the region:

*Internally, DRC have decided we are going to apply the GDPR, the General Data Protection Regulation of the European Union, globally. Previously this was only seen as [applying to] European citizens. Since that [decision was made], [DRC] Regional Directors, Country Directors and the rest of DRC's staff have gained a heightened awareness of the importance of data protection and data sharing agreements [in] projects and partnerships and consortia.*

Additionally, other European NGOs with whom DRC has entered into partnerships or consortia have also required stronger data sharing agreements and tighter GDPR compliance.

As part of a response to these changes, James delivered a training to regional colleagues at the end of 2019 giving an introduction to PIM with a focus on data sharing agreements. James also included a module on the GDPR to give an introduction to its terms like 'data controller' so DRC staff would understand these legalistic terms when they appear in increasingly detailed data sharing agreements.

## Using PIM Principles to improve data sharing agreements

DRC then used the PIM Conceptual Framework to improve its data sharing agreements. James explains:

*The previous data sharing agreements were usually short one-pagers which kind of said 'we will be responsible with our data. We will send it to you once a week and you had better be safe with it as well'. Very very simple, very very top line [agreements].*

*[The PIM Framework] helped [us respond] to the internal and external pressure to be more rigorous with our data sharing agreements. We could use the PIM framework to help with that and we have now drafted maybe six or seven big data sharing agreements for consortia and partners for [almost] every country in our region. So, every country [program] has been applying PIM to help frame these data sharing agreements.*



Staff from the Danish Refugee Council, Jordan, speaking with a mother

## Defined purpose

One of the elements of the PIM Framework DRC used to guide the development of data sharing agreements was the PIM Principles, as described by James:

*When we used [the PIM Framework], we could use things like [the PIM principle that there should be a] defined purpose [for data collection] and not just having fishing expeditions for data. For instance, there is the Durable Solutions Platform (DSP) which we host at the [DRC] Middle East Regional office where we [needed] a data sharing agreement with a number of other data organisations to do research. They wanted to apply a data sharing agreement before having detailed research questions. We were able to apply [the PIM principle of] 'defined purpose' there and say 'you should really say exactly what you want to be collecting and why you want to be collecting it, not just signing a general data sharing agreement. You should be thinking a little more specifically'.*

## Data responsibility, protection and security

*We [also] thought about data security and data protection so actually including clauses about hosting [data], about secure email transmission, about sharing of passwords and different methodologies for sharing of passwords, limiting access for specific staff members, whereas previous [agreements] would just [include] a general statement 'keep it secure'.*

## Informed consent and confidentiality

*Another one – for me the biggest one – was the informed consent and confidentiality aspect. PIM [is rooted in the idea of] an individual’s rights and that protection principle that an individual has digital rights. Although we would see that applied by protection teams, we have had the RYSE consortium which is an economic recovery program, we have had DSP which is more like a research body and we also were in discussion with the LINKED consortium of Lebanon which is economic recovery as well, the cash consortium of Iraq and the cash consortium of Yemen, cash programs; all non-protection programs who have now been able to integrate that rights-based principled language into their data sharing agreements.*

*Previously, not only would it have been a light data sharing agreement but there would have been no reference to these sorts of protection principles; reference to the consent of the data subject...so those are some of the ways we have applied PIM principles to the drafting of the data sharing agreements.*

### PIM Highlights

- Data collection and sharing serves a specific, clearly defined purpose (PIM Principle – defined purpose)
- Ensuring compliance with GDPR, and with ethical and safe management of personal data (PIM principle – data responsibility, protection and security)
- Ensuring that informed consent and language on individual rights of data subjects are recognised and included in data sharing agreements (PIM Principle – informed consent and confidentiality)
- Working together with partners to promote the safe and responsible sharing of data and information (PIM Principle – coordination and collaboration)