

# Digital Accountability

The untapped  
potential of  
participation  
when using digital  
technology in  
humanitarian action

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February 2023

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HUMANITARIAN  
ACTION



This paper is a result of the project component **Enhancing digital literacy: Identifying the opportunities and limitations of digitalisation**, which is part of the project **“Strengthening the Programme and Policy Relevant Capabilities of Humanitarian Actors in Germany” (SPreAD)**, funded by the German Federal Foreign Office.

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## Acknowledgements

Andrea DÜchting (Non-resident Fellow of the Centre for Humanitarian Action) conducted the research and wrote the paper as part of CHA's Data and Digitalisation Project to increase the digital literacy of German and international humanitarian actors. The research and the author's involvement were funded by the German Federal Foreign Office. Andrea thanks Goda Milasiute for guiding the research, Ralf Südhoff, Sonja Hövelmann and Johanna Fipp for their feedback and comments provided on earlier drafts of the report, Ellery Studios for their visual support, and, most importantly, all those who shared documentation or insights during the interview process.

## List of Abbreviations

<b>AAP</b>	Accountability to Affected Populations	<b>HHI</b>	Harvard Humanitarian Initiative
<b>AI</b>	Artificial Intelligence	<b>IASC</b>	Inter-agency Standing Committee
<b>ALNAP</b>	Active Learning Network for Accountability and Performance in Humanitarian Action	<b>ICRC</b>	International Committee of the Red Cross
<b>BMDV</b>	German Federal Ministry for Digital and Transport	<b>INGO</b>	International Non-governmental Organisation
<b>CDAC</b>	Communicating with Disaster Affected Communities	<b>MDH</b>	Misinformation, disinformation and hate speech
<b>CCEA</b>	Communication, Community Engagement and Accountability	<b>NGO</b>	Non-governmental Organisation
<b>CEA</b>	Community Engagement and Accountability	<b>NIST</b>	National Institute of Standards and Technology
<b>CHA</b>	Centre for Humanitarian Action	<b>OCHA</b>	Office for the Coordination of Humanitarian Affairs
<b>CHS</b>	Core Humanitarian Standard	<b>PHAP</b>	Professionals in Humanitarian Assistance and Protection
<b>DESI</b>	Digital Economy and Society Index	<b>PLAIN</b>	Platform Analysis and Information System
<b>DG ECHO</b>	Directorate-General for European Civil Protection and Humanitarian Aid	<b>SDGs</b>	Sustainable Development Goals
<b>EGDI</b>	E-Government Development Index	<b>SMS</b>	Short Message Service
<b>EPI</b>	E-Participation Index	<b>SOHS</b>	State of the Humanitarian System
<b>EU</b>	European Union	<b>UN</b>	United Nations
<b>GDPR</b>	General Data Protection Regulation		
<b>GFFO</b>	German Federal Foreign Office / Auswärtiges Amt		
<b>GSMA</b>	Global System for Mobile Communications Association		

# Executive Summary

Over the past few decades, digital technologies have seen a massive increase in use and have profoundly shaped the humanitarian sector. Their exponential growth has greatly increased the amount of data to be managed and accelerated the speed with which information travels. This growth has triggered discussions around the efficiency of humanitarian services needed to respond to rising humanitarian needs and sector-wide funding cuts by fostering evidence-based programming, improved coordination, and increased accountability. Digital tools have become indispensable. Humanitarian organisations are busy digitising or digitalising selected business processes while others digitally transform their entire business model.

The widespread adoption of digital technologies and abundance of data seems to be in contrast with the digitalisation of programme quality aspects, such as participation and accountability. The potential benefits of digital tools in engaging people and making their voices heard by facilitating participation through fostering real-time information sharing and two-way communication are often overlooked or not fully explored. Different forms of humanitarian feedback mechanisms, including both digital and non-digital communication channels, are often referenced as examples of how to increase accountability by consulting people on various aspects.

## **The use of digital technologies raises questions about participation and accountability**

At the same time, the use of digital technologies raises questions about participation and accountability, or how to involve affected people in designing data-generating tools, managing data, and creating trustworthy data governance systems (e.g. user-centric design, participatory data stewardship, design justice). The debate surrounding digital participation and accountability is gradually gaining momentum, with a growing distinction between legally imposed data subject rights and more rights-based approaches. The aim is to put people at the centre of data-related decision-making and digital design.

The paper examines the interlinkages between digital technologies, and affected people's participation, and accountability. It analyses the potential of using technologies to strengthen participation and accountability in humanitarian action and discusses its dilemma, with a focus on two key questions:

- How do humanitarian organisations consider the use of digital technology to enhance the participation of and accountability to affected populations?
- How do humanitarian organisations take account and hold themselves responsible when using digital technologies? Similarly, how can affected people hold organisations accountable when using digital technologies?

This research paper aimed at primarily focusing on German humanitarian action. However, as only a few German organisations were able to speak about digital accountability in humanitarian action, the scope of the research shifted towards a broader, more international context.

## Methods in Brief

The research paper is based on a literature review and 22 qualitative, semi-structured interviews with 21 different organisations representing German and international NGOs (12), the Red Cross and Red Crescent Societies (2), United Nations (2), and humanitarian and private sector networks (5). Several in-group discussions following Chatham House Rule were organised in support of shaping and validating the research.

## Key Findings

The discussion reveals that digital technologies can effectively enhance participation of and accountability to affected populations, provided they are integrated into a longer-term digital transformation aimed at improving the humanitarian system. It is not only a matter of using digital tools for specific purposes and business processes but embedding technology in systematic ways that trigger a mindset shift and system-wide change.

**Digital technologies can effectively enhance participation of and accountability to affected populations**

Regarding digital participation and accountability, humanitarian organisations tend to prioritise potential risks over actual benefits and, as a result, do not fully leverage the potential of technologies for digital participation and accountability. While affected people worldwide use digital tools to communicate with each other, this is not the case with humanitarian actors. People's apparent communication preferences conflict with data protection, privacy concerns, and security gaps, making it challenging for organisations to fulfil their mandates and commitments to respect people's preferred channels of communication while avoiding digital harm. To allow a nuanced approach and avoid building further on assumptions, more evidence of people's preferred options, harms, and risks is needed.

In addition, humanitarian organisations tend to use digital technologies as part of their feedback mechanism to primarily share information about their programme activities and similar aspects. Few organisations utilise digital tools (e.g. social media platforms) to communicate directly with affected people. Resource constraints, privacy concerns, and political willingness were cited as the main bottlenecks to exploring new ways of engaging affected people in a virtual space, creating trade-offs that can easily lead to unnoticed issues such as misinformation, disinformation, and hate speech. Additionally, feedback data is increasingly digitised but often only processed for specific projects, missing the opportunity to learn and inform organisational and system-wide change.

In sum, digital technologies in humanitarian action have the potential to contain new accountability needs but also reveal important accountability gaps. Using digital technologies often leads to new challenges and questions related to legal, social, and technical accountability. While legal accountability is primarily associated with collecting meaningful consent and technical accountability with applying industry standards, social accountability remains complex and is yet to be explored.

Affected people are rarely consulted during data and technology-related decision-making. The humanitarian crisis in Ukraine highlights the importance of digital literacy in enabling people to claim their data rights, take informed decisions, and engage digitally. New approaches need to be thus considered in order to increase digital accountability alongside people-centred perspectives in technology. However, this cannot be done by one organisation alone. A whole sector and inter-agency approach is needed to raise awareness about new accountability needs and responsibilities in the digital sphere. What does it mean to take a people-centered approach to technology? Simple answers are needed to address complex issues and the dilemma of increasingly replicating offline issues in an online environment.

# 1. Introduction

Over the past few decades, digital technologies have seen a massive increase in use and have profoundly shaped the humanitarian sector. Their exponential growth has greatly increased the amount of data to be managed and accelerated the speed with which information travels. This growth has triggered discussions around the efficiency of humanitarian services needed to respond to rising humanitarian needs and sector-wide funding cuts by fostering evidence-based programming, improved coordination, and increased accountability. Digital tools have become indispensable and humanitarian organisations are busy digitising and digitalising their business processes while others digitally transform their entire business model.

The widespread adoption is also reflected in the increasing numbers of people using technologies and connecting virtually worldwide. According to the Global System for Mobile Communications Association (GSMA), “5.2 billion people subscribed to mobile services in 2020, representing 67% of the global population [...] with numbers expected to increase by half a million subscribers, mainly in Asia and Sub-Saharan Africa, up to 5.7 billion people in 2025, representing 70% of the global population” (GSMA 2021, 3). At the same time, more and more organisations develop data protection policies while governments enact new data privacy laws. According to the Global Partnership for Sustainable Development Data (2022), 62 (out of 142) countries worldwide enacted new laws between 2010 and 2020 alone, which increased the compliance requirements for humanitarian organisations.

The humanitarian sector’s digital transformation has been shaped further by the COVID-19 pandemic and ongoing humanitarian crisis in Ukraine, which pushed organisations to ‘go digital’ in order to maintain

**Technologies often collect massive amounts of data without sufficient consideration for long-term data management or people’s data rights**

contact with local partners and assist people in need. Some argue that digital technologies, such as biometrics used for identity management in cash-based interventions or digitised feedback management systems for improved communication, can enhance aid delivery and accountability. However, regardless of the purpose, these technologies often collect massive amounts of personal and non-personal data without sufficient consideration for long-term data management or people’s data rights, which

could contribute to physical harms, an increased digital divide, datafication, or function creep. Processes for informing or updating people about the full usage of their data, not to mention data subject rights such as objecting, updating, or erasing data that is processed by humanitarian organisations, remain challenging and the subject of ongoing debate (Cieslik et al. 2022; Martin et al. 2022; Vinck et al. 2022; Hilhorst et al. 2021; OCHA 2021; Madianou 2019; van Solinge 2019; Jacobsen et al. 2018; Madianou et al. 2016).

The widespread adoption of digital technologies and the massive amounts of data they generate can create conflicts with programme quality aspects such as participation and accountability. The potential benefits of engaging people and amplifying their voices by facilitating real-time information sharing and communication are often overlooked. Various forms of humanitarian feedback mechanisms, including both digital and non-digital communication channels, are often referenced as examples of improving accountability by consulting affected people on various aspects. However, in reality, feedback systems are primarily used to inform people about programme-related matters and to demonstrate evidence and impact to donors (ALNAP 2022; Ground Truth Solutions et al. 2022; Owl Re 2022; CHS Alliance et al. 2015).

Existing analyses of the use of digital technologies in humanitarian action tend to focus on opportunities and risks associated with their adoption, with accountability being approached from different perspectives. However, the discussion of digital accountability, which involves using digital technologies to enhance the participation of and accountability to affected populations, is still in its infancy. Some scholars have focused on ways to engage people in a digital environment while taking into consideration the challenges of misinformation and disinformation. Others highlight the importance of bridging the digital divide to include those persons who are already marginalised and left behind. Overall, there is an increased awareness to improve transparency when processing affected people’s data and the need for an honest discussion about power dynamics in an offline and online sphere (Schächtele et al. 2022; Bryant 2021; CDAC Network 2021; OCHA 2021; VENRO 2020; Greenwood et al. 2017; Madianou et al. 2016; Sandvik et al. 2014).

At the same time, the use of digital technologies raises questions about data rights and agency, including how to involve affected people in the design of data-

generating tools, capacitate them to claim data rights and make informed decisions. While the debate about digital accountability is slowly gaining momentum, it is still in its early stages and differentiates between legally imposed data subject rights and rights-based approaches that foster programme quality. The overall aim is to put people at the centre of data-related decision-making and digital design. For this to happen, transparency and digital literacy are important. Raising awareness, building and strengthening digital capacities and capabilities will be as essential as acknowledging digital harms and risks (Cieslik et al. 2022; Vinck et al. 2022; Ada Lovelace Institute 2021; Williamson 2020; Madianou 2019; Jacobsen et al. 2018; Madianou et al. 2016).

**The aim is to put people at the centre of data-related decision-making and digital design**

To better understand the linkages between digital transformation and accountability, the ongoing humanitarian crisis in Ukraine is a particularly interesting case.

Humanitarian organisations are part of a digital ecosystem with functioning digital systems (e.g. digital identity, communication channels) and a civil society that, in comparison to many other humanitarian crises, is digitally and data literate, and knowledgeable about their data rights. People are digitally connected and accustomed to navigating digital service environments, which pushed many humanitarian organisations to their limits. The ongoing humanitarian crisis feels like a reality check and raises operational and ethical questions around digital transformation, required capacities, and capabilities, not to mention digital participation and accountability (Calp Network 2022; Ground Truth Solutions et al. 2022; Grunewald 2022; Humanitarian Outcomes 2022).

The German humanitarian environment is another interesting context to examine. While most organisations follow a strong civil society and locally-led approach, they must also be compliant with European and German data protection regimes and, if relevant, existing in-country regulations. Despite this, German humanitarian stakeholders are seldom involved or represented in international discussions surrounding the humanitarian sector's digital transformation. In Germany, the conversation revolves around efficiency criteria rather than digital accountability or a principled approach to technology. Though there is a general desire to be innovative and leverage digital techno-

logies, little attention is paid to the interconnectedness between technology, participation, and accountability.

There are different forms of participation and accountability that need to be taken into account when looking at accountability from a technology perspective (referred to as digital accountability). Both, digital transformation and digital accountability aim to initiate change and transform the sector towards a more people-centred humanitarian system.

This research paper is based on the assumption that the digital transformation of the humanitarian system is inevitable and that new ways of working are needed to respond to an increasingly complex and constantly evolving digital ecosystem. In order to effectively operate in today's digital landscape, humanitarian organisations must possess a better understanding of the impacts that technology can have, and string a balance between the benefits and potential trade-offs for those they aim to assist. This paper aims to contribute to the ongoing discussion around digital accountability by examining the tensions that arise from using digital technology to strengthen the participation of and accountability to affected populations on one hand, and the need for increased transparency and accountability when using digital technology on the other. Both digital transformation and digital accountability aim at initiating change and transforming the sector towards a more people-centred humanitarian system.



## 2. Methods

The research is part of CHA's project on data and digitalisation and was organised in two phases: (1) a literature review that informed and shaped the research's focus, followed by (2) qualitative, semi-structured interviews with key informants and experts representing the humanitarian digital ecosystem.

The analysis of phase (1) comprised documents like academic papers, operational reports and guidance, strategies, and webpages about the use of technology in humanitarian action, digital transformation, and accountability. In addition, several in-group discussions following Chatham House rule were organised as part of CHA's data and digitalisation project and in support of shaping and validating the research, including a round table discussion (December 2021), workshops (June 2022, January 2023) and a public spotlight session during CHA's annual conference (November 2022). In addition, notes taken during different humanitarian events informed the analysis by pointing to the latest discussion and trends.

In phase (2), 45 potential interview partners were contacted, out of which 22 interviews were conducted with representatives from 21 different organisations: German and international NGOs (12), the Red Cross and Red Crescent Movements (2), United Nations (2) and humanitarian and private sector networks (5). Interviews were conducted remotely and online between September and December 2022. The majority of interviewees were headquarters based (i.e. Europe); 3 interviews specifically focused on the ongoing humanitarian crisis in Ukraine. Due to the latest events in

late 2022, it was difficult to schedule additional interviews with stakeholders operating in Ukraine.

To allow for an open discussion, the interviews were not recorded and were conducted as dialogue interviews by using an interview guide which consisted of questions divided by the following sections: Reasons for going digital, digital transformation, digital accountability, challenges, and vision. The interview memos were analysed alongside these same sections.

### 2.1. Conceptual Frameworks

The research is based on two conceptual frameworks: (1) Sheryl Arnstein's Ladder of Participation (1969) and (2) the Core Humanitarian Standard on Quality and Accountability (2015).

Arnstein's Ladder of Participation originates from the discussion about increasing citizen participation and describes eight levels and three categories of participation, ranging from manipulation and therapy, which are referred to as non-participation, to informing, consultation, and placation as degrees of tokenism, and, finally, partnership, delegated power, and citizen control as varying degrees of citizen power. The concept is rarely used in humanitarian debates but influenced several models used by humanitarian stakeholders, like Rocha's Ladder of Empowerment (1997), Hart's Ladder of Children's Participation (1992) applied by UNICEF, and, more recently, approaches to participatory data stewardships introduced by Ada Lovelace



Figure 1: Arnstein's Ladder of Participation (Arnstein 1969)



Institute (2021) (Global Partnership for Sustainable Development Data 2022; Ada Lovelace Institute 2021; Hilhorst et al. 2021; Arnstein 1969; Organizing Engagement n.d.).

When applying the Ladder to the humanitarian system, the first category is restricted to one-way information sharing, the second category to affected people's involvement in project implementation, and the third to negotiation and decision-making.

**Accountability refers to the process of using power responsibly, taking account of, and being held accountable**

The Core Humanitarian Standards (CHS) are a core value in the humanitarian sector reflecting sector-wide collaboration and calls for system change (ALNAP 2022; Hilhorst et al. 2021).

The CHS is used as the main accountability framework for measuring quality and effectiveness of humanitarian action by putting people affected by crisis at the centre. Accountability, therein, "refers to the process of using power responsibly, taking account of, and being held accountable, by different stakeholders, and primarily those who are affected by the exercise of such power" (CHS Alliance et al. 2015, 37).

The CHS encompasses Nine Commitments which are voluntary standards aimed at principled, accountable, and high-quality support to affected people. Many humanitarian organisations either align their policies to the CHS or get CHS certified and undergo regular reviews to identify areas to improve their activities and ensure quality programming from a people-centred perspective. The importance of the CHS is reflected in the number of organisations that are CHS certified: More than 130 national and international organisations worldwide. In Europe, the United Kingdom leads with 19 organisations, followed by Germany with 5, and Ireland with 4 ('Core Humanitarian Standard' 2022).

The research focused in particular on Commitments Four and Five, with the underlying criteria that humanitarian responses are based on communication and participation, and feedback and complaints are welcomed and addressed. Commitment Four is mostly centred on organisations making information on their activities available to people affected by crisis, receiving feedback, and engaging people through

### Humanitarian actors in Germany

The initial focus of this paper included humanitarian actors from Germany. The objective was to better understand the level of digitalisation and digital transformation amongst German humanitarian stakeholders and how they use digital technologies for improved participation and accountability. The findings were then meant to be compared with international discussions. During the research, the focus, however, shifted towards international humanitarian actors as, for various reasons, many German organisations faced difficulties identifying a suitable focal point to speak on programme-quality aspects of digitalisation on the one hand and digital accountability on the other.

Throughout all stages of the project cycle. Commitment Five focuses on receiving information through people's feedback. Commitment Three focuses on the humanitarian response to strengthening local capacities and avoiding negative effects was indirectly touched upon (CHS Alliance et al. 2015).

The usage of the two frameworks is deliberate, as it highlights the inherent challenges and limitations of



Figure 2: The Nine Commitments of the Core Humanitarian Standard ('Core Humanitarian Standard' 2022).

applying Commitments Four and Five of the CHS to Arnstein’s Ladder of Participation. Making information available and receiving information can often be tokenistic activities that only serve to inform and consult people that are “involved to demonstrate that they were involved” but have no real decision-making power or control (Organizing Engagement n.d.). The latest Humanitarian Accountability Report (2022) reconfirmed that “information and communication [are] critical forms of aid, without which affected people cannot access services, make the best decisions for themselves and their communities, or hold aid organisations to account” (Owl Re 2022, 18). Applying both concepts

reflects this inherent challenge of the core humanitarian accountability concept to be acknowledged as tokenistic and impacting different levels of responsibilities. As the paper will show, the tension further increases when digital technologies come into play.

## 2.2 Limitations

Notwithstanding its importance, the analysis for this paper was limited to global-level discussions and did not aim to particularly reflect national or local perspectives, except those collected for the humanitarian context in Ukraine or mentioned by interviewees.

# 3. Digital Technologies to Strengthening Participation and Accountability

There are several factors that motivate the adoption of digital tools for participation and accountability. On

**Affected people are increasingly using interactive communication technologies**

the one hand, affected people are increasingly using interactive communication technologies such as social media platforms and mobile messaging apps to communicate with each other, local

partners, and others. As a result, it feels obvious that they expect humanitarian organisations to employ the same technologies. On the other hand, increased awareness about data protection and privacy risks raises ethical questions around data and digital literacy and increases the imperative of data rights to ensure ‘doing no digital harm.



*Illustration 2: Humanitarian actors prefer traditional ways of communication*



*Illustration 1: Affected people climb the ladder of participation*

Digital technologies are widely considered as having the potential to enable effective aid and service delivery. By using digital tools and communication channels to share information, provide feedback, and submit appraisals, data becomes the “currency of digital transformation, driving changes to systems for decision-making and service delivery” (Global Partnership for Sustainable Development Data 2022, 11). However, the downside of technological shifts is the massive amounts of personal and non-personal data on affected people collected without proper use, deletion, or erasure, which poses potential privacy risks. While these risks might not be new, they impose new trade-offs and real-time challenges for humanitarian stakeholders and affected populations, such as data breaches, misinformation, and disinformation (Martin et



al. 2022; Vinck et al. 2022; Hilhorst et al. 2021; Madianou 2019; van Solinge 2019; Willitts-King et al. 2019; Jacobsen et al. 2018; Madianou et al. 2016).

The initial optimism and promises of using technology to give a voice to affected people and increase efficiency and effectiveness of humanitarian programming through technology have slowly given way to scepticism. The current debate seems to be more risk averse, with concerns around digital harms and an increased digital divide, which could worsen protection risks for already vulnerable and marginalised people. "Collecting ever-more-detailed information that gets digitalised and therefore can be plugging it into software that aggregates and disaggregates for potentially unforeseen uses, introduces new risks that we have yet to fully grasp" (Jacobsen et al. 2018, 16).

Despite this more nuanced approach highlighting potential risks, humanitarian organisations continue digitalising their business processes, often just focusing on one specific business area and piloting one specific digital tool. Coherent and widespread actions and jointly agreed standards on how to develop or use digital tools while protecting affected people's data and privacy are still limited across the humanitarian sector (e.g. IFRC Data Playbook 2022, IASC Operational Guidance on Data Responsibility 2021, ICRC Data Protection Handbook 2020). Best practices and guidance on how to increase data and digital literacy and introduce concepts such as data agency or participatory data stewardship in humanitarian action are scarce (ALNAP 2022; Global Partnership for Sustainable Development Data 2022; Ada Lovelace Institute 2021; Bryant et al. 2020; Willitts-King et al. 2019).

**Jointly agreed standards on how to develop or use digital tools while protecting affected people's data and privacy are still limited**

### Why do humanitarian organisations digitalise?

Interviewees confirmed that digital technologies have become an essential part of the humanitarian system. Digital tools are seen as having the potential to facilitate the sector's efficiency and contribute to overcoming funding shortfalls. In contrast, communication purposes were deemed less important for digitalisation, with only a few interviewees mentioning them. Instead, many highlighted an increased donor pressure and request for evidence and impact as the main driver for 'going digital'.

The use of digital technologies and data management is often not embedded in overarching strategies, and tools are frequently designed or applied in an ad hoc

and isolated manner, without input from local partners, let alone affected people. The tools are often

**Tools are frequently designed or applied in an ad hoc and isolated manner**

piloted when funding becomes available, typically during times of crisis and for one specific project or purpose. Only a handful of interviewees were able

to prove that their organisation's digital transformation process is guided by a long-term vision and a systematic change management approach to digitalisation, data management, and people's engagement.



Illustration 3: Donors request evidence

As a result, interviewees shared that very often data is used inefficiently, resulting in lost funding, limited analyses, and learning, fractured data ecosystems, large administrative overheads, and missed opportunities to replicate the solution for the organisation or the sector as a whole. To these interviewees, short funding cycles, audit requirements, and competition amongst humanitarian organisations drive the sector's digital digitalisation more than ethical considerations toward a more principled approach to technology and digital accountability. Consequently, offline processes are transferred to a digital environment without sufficient risk analysis, often replicating offline problems in an online environment. In this way, learnings for longer-term change and transformation are lost.

Interviewees further stated that concerns around data and technology are no new phenomena but, in an online environment, they pose real-time risks and trade-offs. While acknowledging the huge potential of the humanitarian sector's digital transformation to change humanitarian practices and systems, interviewees emphasized the need for interdisciplinary, cross-functional approaches. For example, linking data protection regimes with cybersecurity and aligning organisational mandates with programme quality.

## When did humanitarian organisations 'go digital'?

Interviewees noted that the increasing importance of digital technologies was evident long before the COVID-19 pandemic. For example, during the humanitarian crisis in Syria in 2016 and 2017, the role of social media and the coordinated disinformation campaign by Russia against the White Helmets in Syria was one

### **The increasing importance of digital technologies was evident long before COVID-19**

of the first instances where the impacts of the so-called 'weaponisation of social media' were experienced. The importance of social media and mobile messaging apps for communication also became apparent during the migration crisis in Venezuela in 2019 and is now evident in Ukraine in 2022. The humanitarian crises in Myanmar in 2017 and later in Bangladesh were other examples of how digital technologies, including social media, played a devastating role for the Rohingya, sparking debated discussions around information and communication as aid, including access to telecommunication and wireless networks.

Considering that humanitarian organisation often digitalise rather than digitally transform their processes, one might question the actual benefits and impacts of 'going digital'. The following sections discuss:

- how humanitarian organisations use digital technologies for increased participation of and accountability to affected populations by looking at digital communication tools and digitised feedback systems;
- accountability measures to hold humanitarian organisations to account when using digital technologies, its opportunities, risks, and challenges encountered by humanitarian organisations and
- the experience of humanitarian organisations when engaging in an already existing digital ecosystem like Ukraine.

## Digital transformation in Germany

In 2022, Germany developed an overarching Digital Strategy managed by the German Federal Ministry for Digital and Transport (BMVD), which inform Germany's digital policy through 2025. The strategy does not explicitly refer to humanitarian action or reference the digital strategy of the German Federal Foreign Office (GFFO), including the early warning platform PLAIN (Platform Analysis and Information System). The Digital Strategy reiterates Germany's commitment towards a multistakeholder approach to digitally drive ecologic, economic, and social sustainability from a people perspective by linking to the Sustainable Development Goals (SDGs). Based on the Digital Strategy, the German Government plans to submit a follow-up draft for its international digital policy in 2023, focusing on development, human rights, democracy, and digital foreign policy. It remains unclear and vague concerning if and how humanitarian action will be reflected therein (BMDV 2022; Voelsen 2022; Auswärtiges Amt 2021; BMDV n.d.).

Overall, Germany is still lagging in comparison with its European neighbour countries. For example, the Digital Economy and Society Index (DESI) ranks Germany in place 13 out of 27 (European Commission 2022). This trend seems to be reflected by many humanitarian organisations in Germany that reported finding it difficult to identify relevant interview partners for this research and forwarded the request to their colleagues at international or regional levels. International interviewees, in turn, perceived German humanitarian actors to be very risk averse for various reasons and seemed to apply a rather conservative approach to technology, which appeared to be restricted to and by European as well as German data protection regimes. In contrast, German interviewees themselves referred to a strong donor pressure to comply with data protection regulations and, at the same time, digitalise organisational processes. According to them, this pressure limits their ability to initiate change from a long-term perspective by questioning their way of working and digitally transforming overarching business model rather than digitalising selected business processes exclusively. Resource constraints and lack of will hinder inclusive processes in quality programming and locally-led design. Even if German humanitarian organisations do decide to increase their digital footprint, they would face difficulties with German donors, who seem to be hardly digitalized themselves, and lack capacities and coherent standards.

Diverse strategies of the GFFO generally refer to strengthening the digitalisation of the humanitarian sector. However, these strategies often lack a thorough discussion on their implications or the standards to be applied. DG ECHO, in comparison, emphasises the importance of promoting a human-centric digital transformation while adhering to the 'do no harm' principles, at minimum (Veron 2022; Auswärtiges Amt 2021; 2019).





Illustration 4: Affected people set off to their digital journey

### 3.1 Digital Participation and Accountability in Humanitarian Action

Humanitarian organisations use digital technologies to engage with people, and increase accountability, and share real-time information to make people’s

**Social media is likely to play an increasingly prominent role for affected people**

voices heard. Interactive tools such as social media and mobile messaging apps alongside digital platforms for managing feedback data continue to be on the rise. According to Lough (2022), “social media is likely to play an increasingly prominent role for affected people in current and future crises [and] it is not a phenomenon humanitarian actors can continue to side-step “ (Lough 2022, 7). Thus, the latest studies discuss the tension between digital technology, participation, and accountability by looking at opportunities, trade-offs, and risks. They also stress the need for an in-depth analysis of technologies aimed at promoting accountability and inclusion, with a

focus on bridging the digital divide of those already marginalised and left behind (Lough 2022; Bryant 2021; CDAC Network 2021; OCHA 2021; Madianou 2019; Madianou et al. 2016; Sandvik et al. 2014).

#### 3.1.1 Digital Technologies for Information-sharing and Collecting Feedback

In addition to traditional forms of participation and collecting feedback, such as face-to-face interactions and focus group discussions, humanitarian organisations currently apply a mix of digital and non-digital approaches to inform affected people, collect their feedback, and ask about their satisfaction. These vary from helpdesks and suggestion boxes to toll-free hotlines, mobile messaging apps, social media, and chatbots.

The table below gives an impression of the different types of technology commonly used by humanitarian organisations and repeatedly mentioned by interviewees. However, it is not an exhaustive list of tools and instruments currently available and being used in humanitarian response.



- Can be used at scale
- Can increase accessibility for persons with disabilities and others
- Provides innovative learning platforms

## Chat/ Voicebots (e.g. ChatGPT)

- Information-sharing
- Answering frequently asked questions
- Creating feedback loops
- Identifying specific user interests or intent (AI/ML-based)
- Integrating multi-languages



- Familiarity
- Usually offered as toll-free setup
- Can increase accessibility for persons with disabilities and others
- Can be easily linked with Interactive Voice Response (IVR)



- Depend on wireless and mobile data networks
- User-friendliness and user-centric design, culture, and age to produce noticeable added informational value need to be considered

## Hotlines

- Information-sharing
- Consulting and involving people
- Creating feedback loops



- Manageability at scale, data protection and privacy, authenticity of user, culture, and age need to be considered

## Mobile messaging tools (e.g. Facebook Messenger, Telegram, Viber, WhatsApp)

- Information-sharing
- Consulting and involving people
- Creating feedback loops



- Depend on wireless and mobile data networks
- Manageability at scale, data protection and privacy, culture and age need to be considered



- Familiarity
- Can integrate different functions (e.g. text, audio, voice recording, visuals, files), provide real-time information, improve data-driven decision-making

## Selected tools used for information-sharing and collecting feedback

### Short Message Service (SMS)

- Information-sharing
- Consulting and involving people
- Creating feedback loops



- Familiarity
- Cost-effectiveness
- Can be used at scale
- Wireless and mobile data network not required



- Offers non-real-time services, messages might be delayed or delivered to wrong recipient
- Limited message size (160 characters per message)

### Social media platforms (e.g. Instagram, Facebook, Twitter)

- Information-sharing
- Consulting and involving
- Tracking rumours, misinformation, disinformation and hate speech (MDH)



- Familiarity
- Can be used at scale
- Can provide real-time information and improve data-driven decision-making



- Depend on wireless and mobile data networks
- Manageability at scale, data protection and privacy, authenticity of user, culture and age need to be considered

Compared to most offline approaches, such as face-to-face interactions, digital tools are primarily used for one-way information sharing and occasionally for tracking rumours, but are not

**Digital tools are primarily used for one-way information sharing**

widely seen as a two-way communication channel to consult and actively involve affected people. Although some humanitarian organisations prefer technologies like hotlines, IVR or SMS, they are often hesitant to use mobile messaging tools and social media platforms, and even less likely to use AI-based chat or voicebots, which are still rarely used. When applied, these tools are not typically considered two-way communication channels and are mainly used for limited purposes such as sharing programme information, programme changes, updates, or time-bound campaigns.

According to the interviewees, the focus on one-way communication channels is mainly due to data protection and privacy concerns, resource constraints, and unclear roles and responsibilities. While feedback systems are usually managed by monitoring and evaluation teams, communication teams would be best placed to monitor social media platforms or other communication tools. Many organisations, however, do not have dedicated communications teams or campaigners in place and use social media for other purposes like fundraising. As a result, the spread of misinformation and disinformation online often remain unknown and neglected.

**The spread of misinformation and disinformation online often remain unknown and neglected**

According to some interviewees, justifications for not having sufficient resources and capacity to monitor social media are seen as fake arguments. Instead, they argue that it is a matter of political will. Alternative, community-led approaches, such as working with selected community members who are close to the communities, have access to, and actively use social media, could act as gatekeepers or influencers for humanitarian organisations to quickly learn about rumours, misinformation, or disinformation. Involving the digitally literate and connected diaspora was mentioned as another way to keep track of people's digital interactions.

Furthermore, the decision for and application of specific communication channels or tools needs to be context-specific and depends on the anticipated usage. Although face-to-face interactions were highlighted as the preferred communication channel, one interviewee however acknowledged that this assumption was hardly based on facts and could be potentially biased. In contrast, another interviewee reflected that their organisation had changed and

**Misinformation, disinformation, hate speech**

Misinformation, disinformation, and hate speech (MDH) is an umbrella term that usually refers to forms of spreading false information such as information operation, mal-information, fake news, rumours, and propaganda. These can all occur through digital and non-digital means, and in online and offline spaces. While the phenomenon is not new, MDH in an online environment can have real-time impacts and exacerbate potential harms in offline environments. The widespread use of mobile messaging tools and social media platforms as primary sources of information and communication has accelerated the scale and velocity of spreading information online and exposes people to a mix of news and opinions, with little in the way of gatekeepers or authorities to mediate or filter the information for quality.

There have been many examples that demonstrate how false information can quickly exacerbate physical, psychological, and social harm. Moreover, the emergence of new AI-based tools like machine learning algorithm has contributed to the development of an information ecosystem in which false information spreads "at least six times faster than the truth" (Vosoughi et al. 2018 in: Fivenson 2021, 5). As of now, there are few guidelines but no standards on how to deal with MDH. Some believe this phenomenon to be a technology problem, while others advocate for a joint responsibility of diverse sectors, including humanitarian, development, and private sectors (Lough 2022; Scott 2022; Fivenson 2021; ICRC 2021; Mercy Corps et al. 2019; Oh et al. 2018; Bugge 2017).

diversified its channels by adding more digital tools after listening to their local partner, who raised the need to consider mobile messaging tools as a viable alternative when face-to-face meetings with affected people became impossible.

**The tension between data protection and protection**

The interviews revealed a cultural and ethical divide when it comes to using mobile messaging apps and social media platforms. While Madianou et al. (2016) still observed optimism in the humanitarian sector which, despite limited evidence, attributed to digital technologies having "the capacity to give voice to affected people and hold humanitarian agencies into account, thus addressing the power imbalances in the responder-beneficiary relationship" (Madianou et al. 2016, 2), practitioners told a different story. The optimism seems to have shifted to scepticism and a rather pessimistic focus on putting protection risk and cybersecurity threats at the centre of decision-making. Interviewees shared multiple examples where specific digital tools like mobile messaging apps or social me-





*Illustration 5: Affected people face challenges to climb-up the ladder of participation*

dia platforms were opted against and restricted for data protection reasons, even though affected people had chosen those tools as their preferred options to receive information and communicate with humanitarian stakeholders. Although organisational mandates would argue otherwise and decision-making is meant to lie with the business, organisational risks

**Digital tools are opted against and restricted for data protection reasons**

informed by cybersecurity and compliance seemed to be more important.

This experience is further reflected in the numerous toolkits for managing feedback and appraisal. Although humanitarian organisations purport to use accessible, familiar, and easy-to-use communication channels such as mobile messaging apps and social media platforms, the interviews showed that these platforms are often restricted for (data) protection and security reasons. Interviewees stressed the need for organisational mandates to surpass data protection regimes and prioritise safeguarding feedback, particularly concerning people’s security. While ensuring affected people’s safeguards could be argued from protection as well as data protection lenses, the interviews revealed a general lack of evidence on

the type of sensitive and non-sensitive data shared through different communication channels or technologies in actuality, with one interviewee stating that specific channels would not be used for sharing sensitive information anyway. To mitigate risks, interviewees highlighted the importance of diversifying the tools, offering a mix of offline and online channels and closely analysing the information received from affected people and partners. This would contribute to taking more informed decisions about secure communication channels on the one hand and preferred types of communication on the other.

Another risk mitigation measure is cross-functional structures and interdisciplinary processes to discuss the pros and cons of digital tools and inform decision-making. Interviewees, for example, referred to situations where programme teams were considered to bear the potential risks without properly understanding the technology and legal concerns. In other words, the decisions for or against specific mobile messaging apps or social media platforms depend on digital literacy, capacity, and resources, but also mandates, culture, willingness, and risk appetite.

## What about inter-agency feedback mechanisms?

The development of inter-agency feedback mechanisms is commonly considered an opportunity and ethically right development to respond to common problems with a unified approach. Interviewees agreed, however, that inter-agency systems add another layer of complexity. In some contexts, a toll-free hotline is set up to manage feedback for multiple organisations, which relieves affected people of the burden of finding the right number to reach the right organisation for the right issue. Despite this convenience, interviewees indicated that these inter-agency mechanisms are rarely used and not preferred by many organisations. Typically, one organisation, in most cases a UN Agency, leads such mechanisms, but this organisation is not seen as neutral and is not trusted by all humanitarian stakeholders. In some contexts, OCHA has taken on the role of coordinating inter-agency mechanisms, but interviewees did not consider this to be a suitable alternative.

In addition, different data protection regimes and responsibilities lead to lengthy data-sharing negotiations to identify the types of data transferred, the data flows, and data risks. Conflicts of interest and reputational risk are additional hindrances to onboarding humanitarian actors to inter-agency feedback mechanisms. Although interviewees generally seemed to agree that inter-agency setups would benefit affected people, operational hurdles were felt to be too high. To create a trustful relationship, some interviewees thus suggested a neutral body to manage such a system.

Communication and feedback mechanisms play a crucial role in strengthening participation and accountability. Feedback mechanisms that are independently set up could have the potential to contribute the tackling of power asymmetries. By doing so, they can overcome cultural issues and fears related to reputational loss or loss of control to a single lead agency. The same potential applies to feedback mechanisms functioning as an interactive approach across programmes and organisations. The entry point into a feedback mechanism is crucial, as the approach taken can vary significantly from a customer relationship or a programme quality perspective. Most humanitarian organisations approach feedback mechanisms from a programme quality perspective. If organisations would opt for a customer-focused approach, more capacities and resources would be needed to translate this perspective into humanitarian realities by developing, learning, and advancing new types of services.

**The entry point into a feedback mechanism is crucial**

## 3.1.2 Digital Technologies for Processing Feedback Data

Humanitarian organisations not only use digital technologies to engage affected people but also use different digital tools for processing feedback data and closing the feedback loop. These tools serve various purposes, including case management and programme quality issues, and are part of organisational monitoring and evaluation systems. Organisations use either open-source or off-the-shelf solutions, which are globally or locally managed. Most of the tools originate from the private sector and were developed for purposes such as customer relationship management and, thus, need to be customised for the humanitarian context. Despite efforts to customise these tools,

**Closing the feedback loop involves responding to affected people**

interviewees still observed difficulties resulting from different service approaches and feedback logic. In comparison to private sector solutions, which manage feedback as a linear process, humanitarian organisations consider feedback an interactive process during which different programmes, units, or organisations need to be, in theory, consulted and involved. At the very least, intra- and inter-organisational coordination is a key objective. However, ensuring that all kinds of feedback data are documented and inputted into the system remains a challenge. Additionally, closing the feedback loop involves responding to affected people, taking action based on the feedback across programmes or organisations, and reporting back to affected people and communities.

While security considerations of off-the-shelf solutions were usually mentioned by the interviewees as an asset, software license and customisation costs were raised as challenges. Funding for programme quality and accountability generally increased but usually does not cover long-term investment costs, such as risk assessments, piloting, and testing, which leaves middle management to then have to agree on the level of investment or risk tolerance regarding introducing a centrally-managed versus project-based feedback system.

Both ALNAP's State of the Humanitarian System (2022) and the Humanitarian Accountability Report (2022) confirmed this trend. Despite massive investments in feedback mechanisms, such as diversified communication channels and digitised systems, they continue to fail in their promises of improved accountability and participation. Due to various reasons, CHS Commitments Four and Five remain the poorest of all commitments: "Commitment [Five] has been the lowest-scoring Commitment since the creation of the CHS [...]. This low score signals that organisations are making efforts to take complaints seriously and act on



what they hear, but these are not systematic, meaning organisations could be failing individuals and missing important warning signs for wider problems “ (Owl 2022, 17). Even though feedback mechanisms are set up to improve programme quality, data is mainly used to report back to donors and host governments and show evidence for providing impact (ALNAP 2022; Owl Re 2022; Ground Truth Solutions et al. 2022; Madianou 2019; Madianou et al. 2016).

### How do humanitarian organisations take accountability when using digital technology?

In summary, interviewees seemed to generally agree that digital tools are an important opportunity to improving participation through listening and consulting with affected people. Technology is considered a viable channel to engage affected people, but it's not the only method. Interviewees also highlighted the importance of diversifying the type of communication channels, including offline as well as online channels to ensure different population segments with diverse information and communication needs, including people with disabilities, children, youth, and adolescents, are reached. In other words, technology can be an enabler, provided it is used carefully chosen and considered to diversify communication channels.

Nevertheless, digital technologies' promise to strengthen the participation of and accountability to affected populations falls short of its actual benefit and potential. Its utilisation is limited primarily to one-way

**The use of digital technology is limited primarily to one-way information-sharing and thus reinforces the tokenistic involvement of affected people**

information-sharing and thus reinforces the tokenistic involvement of affected people. Due to strict data protection regulations and security concerns, humanitarian organisations continue using traditional ways, such as face-to-face interactions, for two-way communication, assuming this

preference is mutually shared by affected people. This not only leads to missed opportunities to diversify existing communication channels and digitally include different population segments but also to take note of new trade-offs, such as MDH.

In turn, digitised feedback mechanisms focus on closing feedback loops in isolation, missing out on addressing accountability problems. It feels like there are many lost opportunities for transformation and systematic change.

### German humanitarian action

German interviewees considered feedback mechanisms to be a normative approach to strengthening accountability to affected populations, which, unfortunately, is often used as a “window dressing” justification to prove the success and impact of a specific project. The mechanisms in place are not necessarily applied to engage affected people in decision-making. Despite the importance of digital literacy amongst staff and affected people, which was widely acknowledged to be essential for digital transformation and accountability, local partners and affected populations are rarely involved in overall digitalisation processes, let alone technology design and choices. In times of crises, when funding is available but time is a scarce resource, new tools are often piloted without first engaging a diverse group of stakeholders.

## 3.2 Legal and Social Accountability in Humanitarian Action

The ethical dimension of accountability when using technologies for accountability purposes is determined by how technologies are applied and its impact on those whose data is processed, as well as those who are meant to benefit from using the technologies. It goes beyond giving account, such as informing affected people about the technology, and data processing activities, and taking account feedback, involving affected people in design, and decision-making. It raises ethical questions around responsibility, transparency, and ownership by holding organisations to account when using digital technologies. In other words, digital technologies can contain new accountability needs but also reveal important accountability gaps (Hilhorst 2018; Jacobsen et al. 2018).

According to Madianou (2019), “the logic of humanitarian accountability assumes that interactive technologies will give voice to affected communities to hold aid agencies to account.” The above analysis has already proved this assumption to be wrong. She further states that “the logic of humanitarian accountability is at odds with a second logic of audit, which recognizes the potential of technologies and data as metrics for audit which donors demand” (Madianou 2019, 4). Pizzi et al. (2020) thus differentiate different forms of accountability which need to be taken into account when looking at accountability from a technology perspective, which is also referred to as digital accountability. They range from technical to social and legal accountability: “Technical accountability requires auditing of the system itself. Social accountability requires that the public have been made aware of [the] systems and have adequate digital literacy to understand their impact. Legal accountability requires

having legislative and regulatory structures in place to hold those responsible for bad outcomes to account” (Pizzi et al. 2020, 173).

Following this logic, affected people need to be made aware of the technologies used and subsequently capacitated to understand the impact of using technologies and make informed decisions on this basis. Regulatory frameworks such as data protection are one component to increasing organisational responsibility to protect people’s data. At the same time, they include data subject rights, which refer to individuals having the right to hold these same organisations to account in case of misuse. In the humanitarian system, legal accountability is mostly considered a ‘must

**Social accountability, such as digital literacy and data agency, is characterised more as an ethical question and a ‘nice to have.’**

have,’ primarily due to its nature of being a legal requirement that is also requested by donors. Social accountability, such as digital literacy and data agency, is characterised more as an ethical question and

a ‘nice to have.’ Technical accountability is usually referred to as technology industry standards (e.g. ISO, NIST) and is usually considered part of compliance in response to donor requirements.

Digital accountability is further discussed from a legal and social perspective below, examining current practices and challenges to better understand how humanitarian organisations prescribe accountability and hold themselves responsible when using digital technologies and, vice versa, how affected people can hold organisations to account when utilising digital technologies themselves.

### 3.2.1 Legal Accountability as a ‘Must Have’

In the digital humanitarian context, legal accountability mainly refers to compliance and different data protection and privacy regimes, including national and regional legislation such as the European General Data Protection Regulation (GDPR) as well as local laws which may apply and organisational compliance systems. While non-governmental organisations are bound to such laws, international organisations are generally exempt and claim to follow best industry standards, such as GDPR and others.

*Illustration 6: Affected people share their data for aid without further climbing the ladder of participation*





Most of the interviewees considered the collection of consent as a good practice to increase accountability. While consent is an important cornerstone of data protection and data governance, “it is increasingly viewed as insufficient on its own to foster accountability” (Global Partnership for Sustainable Development Data 2022, 36f). For meaningful consent, affected people need to know about and understand the purpose of using the technology and receive information about their data rights, such as rights to objection, erasure, access, and rectification. Power asymmetries and digital literacy levels influence affected people’s decision to share or not to share their personal data in return for assistance, which is often referred to as ‘data for aid’. In case someone opts out, humanitarian organisations claim to respect people’s right to say no and offer a viable alternative for accessing assistance (Veron 2022; Bryant 2021; Holloway et al. 2021; ICRC et al. 2020; Greenwood et al. 2017).

**For meaningful consent, affected people need to understand the purpose of using the technology and receive information about their data rights**

While this is widely recognised as a viable alternative to the use of technology for accountability purposes it is rarely utilised by affected people, who are rarely made aware of the full scope of the technology and their rights. When they are informed, they may struggle to understand the potential impact. Interviewees confirmed this challenge and questioned whether consent could truly be considered meaningful when people are not in a position to make informed decisions.

### The importance of data and digital literacy in Ukraine

The example of Ukraine illustrates the significance of digital literacy in asserting data rights and making informed decisions. When people know about and understand their rights, they are better equipped to raise concerns and inquire about the location of their data. Some interviewees shared instances of people asking for their data to be updated or erased, which was difficult to respond to as the organisations lacked the relevant processes and transparent data flows necessary to track down all data points.

**Many organisations were forced to admit that their data systems were not fit for purpose**

to feel overwhelmed by the high number of incoming calls and requests, which most of the organisations

In addition, hotlines and data systems were set up quickly, but humanitarian organisations soon began

were not accustomed to from other humanitarian crises. Interviewees confirmed that feedback mechanisms, in theory, could be used for claiming data subject rights but, apart from Ukraine, it has rarely been observed thus far. In Ukraine, affected people did raise concerns, and many organisations were forced to admit that their data systems were not fit for purpose. While processes and systems are, in theory, legally compliant, they fail the operational reality check to respond to people’s rights. This raises practical and ethical questions around the humanitarian system’s ability and willingness to start operationalising and tackling uncomfortable accountability questions.

Building data literacy and, subsequently, data agency is increasingly acknowledged to be key in ensuring legal accountability. However, capacitating people to build and strengthen digital literacy takes time. It is thus not surprising to see that most of the data protection policies or strategies in the humanitarian sector are globally or regionally-led, focusing on in-house processes first. Frontline workers and partners are rarely involved or capacitated to emit the right messages across to affected people. Some interviewees admitted that, because compliance risks or breaches have financial implications, policy implementation focuses on in-house processes first, while operational risks remain untouched and left to in-country partners. In other words, humanitarian organisation address compliance needs but face difficulties in operationalising and reflecting those in humanitarian realities when engaging local partners and affected people.

### 3.2.2 Social Accountability as a ‘Nice to Have’

Another factor driving digital transformation and the use of technology is the aspiration to address longstanding power asymmetries within the humanitarian system. According to Ground Truth Solutions et al., “people’s sense of disempowerment is [nowadays] so strong that they often don’t even try to engage” (Ground Truth Solutions et al. 2022, 2). The importance of

**Valuing and taking action upon people’s feedback builds trust**

trust and trustful relationships with affected populations have been repeatedly mentioned by interviewees. Informing people about programme decisions, the technology used, and data processed, as well as their right to express their opinion and claim their data rights, are the very basics for creating trustful relationships. There seems to be a common understanding that valuing and taking action upon people’s feedback builds trust and fosters active engagement. While this undoubtedly refers to accountability measures in general, digital accountability adds another layer of

complexity by attempting to tackle longstanding power relations on the one hand and the dilemma of replicating or risking to increase power imbalances and widening the digital divide on the other (Bryant 2022; Martin et al. 2022; Ground Truth Solutions et al. 2022; Owl Re 2022; Bryant et al. 2020; Madianou et al. 2016).

Concepts like Accountability to Affected Populations (AAP) or Community Engagement and Accountability (CEA) are usually embedded within monitoring and evaluation aimed at improving programme quality with limited leverage to change organisational approaches to digitalisation. Most interviewees shared an AAP/CEA background and wished for their organisations to approach digitalisation

**Feedback data is usually collected on a project basis**

from a social accountability perspective, or, in other words, fighting overall power imbalances instead of reinforcing them through digital technologies.

However, because feedback data is usually collected on a project basis and not often used across the organisation, it is difficult for individuals to influence change across the organisation, let alone raise the topic of digital accountability, which still lacks widespread awareness. Interviewees were hoping to gather insights from their regular CHS review processes that would then allow them to highlight the interlinkages and tension between technology, participation, and accountability. Others recommended the ongoing global CHS revision process to better reflect people-centred design and overall digital considerations in accountability (e.g. privacy, data agency participatory data stewardship). When discussing digital technologies in accountability, it seems that humanitarian actors need to start talking about the transformative aspect of digitalisation leading to system change, or, as one of the interviewees called it, "a debate about accountability 2.0."

**Humanitarian actors need to talk about accountability 2.0**

In practice, interviewees confirmed the assumption that most humanitarian organisations prioritise compliance and audit requirements when it comes to accountability. As a result, concepts and approaches intended to strengthen accountability as part of digital transformation, such as user-centric design, participatory data stewardship, and others, are rarely used and remain an ethical question that some humanitarian organisations have only recently begun discussing.

## German humanitarian action

Most of the German humanitarian organisations are dual-mandated and operate in humanitarian and development contexts with access to different funding streams. They follow a strong civil society and localisation approach which is participatory- and accountability-driven, which is reflected in many German NGOs being CHS certified or referencing the CHS in their accountability strategies. However, the use of digital technologies for strengthening the participation of and accountability to affected populations seems to be rarely discussed within the organisations or in national fora. Only a few German humanitarian actors were able to identify relevant interview partners and instead referred to their international colleagues' expertise when discussing the issue of digital accountability. Additionally, few German actors are involved in international debates and aware of existing standards such as the IASC Guidance on the Responsible Use of Data (2021).

Interviewees and workshop participants confirmed the challenge of using digital technology for providing humanitarian services on the one hand and increasing digital accountability for strengthening a people-centred approach when using technology on the other. While compliance issues are typically focused on, operational challenges in crisis settings have increasingly brought them into question. Interviewees noted a contradiction between pushing for a locally-led humanitarian response with local partners and people at the centre and the standardisation and centralisation of data systems that partners and people do not have access to.

There is an increasing tension between funding availability, donor expectations, compliance requirements, and programme quality. As a result, two extremes were observed by interviewees: (1) A conservative approach to protecting affected people by limiting or not using digital tools at all and (2) solely relying on digital tools for showing impact, creating dependencies, and exposing affected people to harmful practices. Very few organisations seem to apply a nuanced approach embedding 'doing no digital harm' and people-centred principles in digital transformation and accountability processes.

### 3.3 Case Study: Humanitarian Organisations in Ukraine's Digital Ecosystem

In 2020, the UN ranked Ukraine in place 69 out of 193 on the E-Government Development Index (EGDI) and 46 out of 193 on the E-Participation Index (EPI) – in comparison, Germany lies on rank 25 and 57, respectively. The EGDI measures online services, telecommunication infrastructure, and human capacity and shows global trends in e-government development. Leading performers include many European countries like Denmark, Estonia, and Finland and the Republic of Korea as the global leader in online services provision and the top EGDI performer in Asia. This makes Ukraine belong to the group of countries with high values in this index (United Nations 2020).

The high values are based on a functioning digital system characterised through a dedicated Ministry for Digitalisation, digital ID system, highly digital literate civil society, and enormously high percentage of mobile phone penetration (96%) among the adult population (Calp Network 2022; Ground Truth Solutions 2022; Grunewald 2022; Humanitarian Outcomes 2022). According to the interviewees, mobile messaging apps such as Viber, Telegram, and WhatsApp, and social media platforms, such as Facebook/Meta and Instagram, are widely used and applied for nearly everything, from personal aspects of life to matters concerning public state requests or humanitarian services. As one of the interviewees mentioned, it was thus not surprising that people on the move requested telecommunication and internet as a service.

Interviewees also confirmed the impression that affected people are generally interested in what happens to their data and are familiar with data protection regimes like GDPR,

**In Ukraine, people are generally interested in what happens to their data and are familiar with data protection regimes**

even if it is not applicable in Ukraine. In comparison to other humanitarian operations, humanitarian organisations increasingly received data-related questions and comments but struggled to retrieve all data flows and respond to the request, primarily due to a lack of relevant processes in place. Human capacity is perceived to be comparatively high and reflected in programme quality.

The high number of people who are digitally connected is concentrated in urban areas. In contrast, nearly 60 percent of the adult populations in rural areas have

little to no digital skills, particularly people above 60 years (Calp Network 2022, 5). According to the interviewees, individual relations are especially important for those having issues with using digital tools, as the relations are built on trust. To overcome communication challenges, opinion leaders and familiar influencers are involved. One of the interviewees mentioned that working with online influencers implies multiple efforts as they need to be duplicated offline to respond to the massive amount of information online. The communication channels and tools chosen thus highly depend on the topic and purpose for engaging people. One of the interviewees reiterated that communication is based on what motivates people. In order to meet people where they are, one needs to understand the audience and their trusted sources.

**Organisations struggled to respond to the enormous number of people raising communication and accountability concerns**

The digital environment prompted many humanitarian organisations to build on the existing financial and digital infrastructure and develop standalone online, self-registration platforms. This has led to different platforms operating in parallel. Organisations struggled to respond to the enormous needs and number of people who had registered on those platforms, raising communication and accountability concerns (Calp Network 2022). The integration with the national social protection platform diia only happened recently. There are different reports, including the Ukraine Flash Appeal, which reflect this concern and the need for more coordination towards strengthening accountability to affected populations and communication by humanitarian organisations in Ukraine (Calp Network 2022; CDAC Network 2022a; 2022b; OCHA 2022).

Interviewees noted that this trend was also reflected in the numerous gadgets that humanitarian organisations have developed and labelled as digital innovation. While these gadgets are used for various purposes, they lack basic accountability requirements and are not integrated into a cohesive system. In addition to the overwhelming number of calls, a lot of unaddressed feedback on social media was observed. Interviewees again confirmed that social media is primarily used for one-way information sharing without having the capacity to actively communicate with affected people or monitor rumours, misinformation, or disinformation.

To overcome feedback fatigue, an inter-agency feedback system is principally agreed upon but not implemented, mainly for reputational and funding reasons, and conflicts with diverging processes at organisational level (CDAC Network 2022b). At the same time,

there are many new actors involved in the digital humanitarian and information ecosystem, following different objectives and logic. According to various interviewees, humanitarian organisations seem to struggle to communicate with non-traditional stakeholders, such as the private sector, and find the right common language and digital tools, such as feedback mechanisms, which can be easily customised to humanitarian purposes.

**NGOs seem to struggle with increasingly sophisticated cybersecurity attacks and MDH**

Interviewees also highlighted the challenges resulting from increasingly sophisticated cybersecurity attacks and MDH, which NGOs in particular seem to struggle with due to a lack of resources and capacity. Additionally, mutual learning is hindered by a lack of open references to sensitive cases. According to the Cyber Peace Institute (2022), which conducts quar-

terly reports on cyber incidents against entities in Ukraine, cybersecurity threats continue to increase, with particular targeting Ukraine's public administration. Between January and September 2022, 178 incidents were documented, representing an increase of 248% compared to the previous quarter (i.e. Q3 2022) (Cyber Peace Institute 2022).

The humanitarian crisis in Ukraine provides an interesting example that challenges the current digital accountability practices and highlights the importance of digital literacy and people-centred approaches. When affected people are able to navigate digital tools and understand their data rights, they do not question the use of technologies and digital services and are more likely to hold humanitarian organisations accountable. This experience has triggered a humanitarian debate about digital accountability that focuses on operationalising legal and social accountability, such as data subject rights, data literacy, and data agency.

## 4. In a Nutshell

Digital technologies are widely regarded as tools that can enable participation and accountability while responding to affected people's growing demand for digital communication and engagement. Therein, digital technologies have the potential to transform the humanitarian system by questioning underlying power imbalances. Its usage is, however, highly context-specific and depends on organisational willingness and capacity to actively engage local partners and affected populations.

The topic of digitalisation is rarely reflected in discussions surrounding accountability. Likewise, accountability practices are not fully integrated into digitalisation or digital transformation efforts. At the same time, Arnstein's Ladder of Participation highlights the need for active engagement and decision-making processes to foster digital and non-digital accountability and move beyond information-sharing and tokenistic activities. The ongoing CHS revision process provides an excellent opportunity to mainstream and integrate aspects around digital accountability and promote ethical considerations

**There is a need for active engagement and decision-making processes to foster accountability and move beyond information-sharing and tokenistic activities**

around the development, testing, and usage of digital technologies. It is crucial to avoid replicating offline accountability issues and power imbalances in a digital environment.

The intersection of digital technologies, participation, and accountability must also address potential risks and potential harms associated with their use, which are commonly mitigated through compliance structures. However, a more participatory and inclusive approach could empower local partners and affected people to strengthen their digital literacy skills and increase data agency. Humanitarian organisations have the ability to incentivise these efforts and create mechanisms for people to share their opinion, co-design digital solutions, raise concerns, and access data by safeguarding privacy. Information sharing to increase transparency and accountability not only generates ownership but also promotes responsible data systems. Ultimately, the type of technology used will depend on the context, affected people's preferences and abilities, and the capacity and willingness of humanitarian organisations.



## Summary of key findings

### Digital transformation

1. Digital transformation is driven by purpose, process, and people to increase efficiency and impact. Humanitarian organisations, however, tend to digitise or digitalise selected process only.
2. Digital technology has the potential to transform humanitarian systems from a people- and human-centred perspective. However, the involvement and decision-making power of local partners and affected people remain limited.
3. Digitalisation is a transformation process built on longer-term visions and strategies. In reality, the use of technology is rather short-sighted, learning and funding are lost, data is not used efficiently, administrative overheads increase, and data systems remain fractured.
4. Interdisciplinary, cross-functional approaches initiate improved understanding and mutual learning to drive digital transformation.
5. There is a lack of system-wide collaboration and coordination to increase oversight and accountability towards jointly agreed standards.

### Digital participation and accountability

1. While digital technologies in feedback mechanisms are used, it is primarily for one-way information-sharing.
2. There is a missed opportunity to include all population groups and diversify communication channels by including digital technologies.
3. Data protection regimes conflict with organisational mandates and impact decisions for the type of communication channel preferred by affected people and used by humanitarian organisations.
4. New trade-offs like MDH are widely deprioritised, rarely monitored and thus neglected.
5. Digitised feedback systems are primarily used to show impact of specific projects and hardly for overall decision-making to change processes and approaches.
6. Feedback systems in humanitarian action differ from commercial customer relationship management systems. Digital solutions need to be thus customised and contextualised and follow a different service definition and ways of working.

### Legal and social accountability

1. Consent is perceived to improve legal accountability. However, it needs to be meaningful and is thus increasingly questioned.
2. Affected people are hardly informed about the use of technology and their data rights. To claim data rights, people's digital literacy is key, as are organisational processes and oversight to respond to those claims.
3. Data literacy is key to claim data rights.
4. Digital accountability is rarely embedded into quality programming or technological development.
5. Change takes time and requires an open and nuanced debate with diverse stakeholders. Trust is key for digital accountability.

## 5. Recommendations



### Vision and mission

- Digital transformation and accountability need to be driven by mindset shifts, change, long-term strategies, and learning. All functions and management levels are essential to drive such change.
- Jointly agreed standards are necessary to integrate digital accountability into programme quality approaches, including the CHS. Mainstreaming digital considerations into the ongoing CHS revision process would benefit the overall accountability debate.

### Capacities and learning

- A nuanced approach is key to respect people's preferred communication channels and balance potential risks.
- Resources for digital accountability, transformation, and learning are essential to replicability and reducing power imbalances, alongside research to gather more evidence and inform decision-making.
- Funding streams need to reflect data systems as part of long-term digital transformation, which affects different phases of humanitarian crisis.





### People, purpose, and process

- Digital tools support engagement and the diversification of two-way communication while being mindful of misinformation and disinformation.
- Feedback data needs to be shared beyond isolated projects, triangulated, and embedded into overarching data systems that allow informing organisational and system-wide change.
- Local partners and affected people need to be adequately informed and actively involved in data and technology-related decision-making.
- New profiles and capacities are needed to promote digital literacy and data agency, increase mutual learning and understanding, and translate digital considerations into user-friendly concepts such as user-centric design, and participatory data stewardship.

### German humanitarian action

- Germany's digital strategy and digital policy need to differentiate between development and humanitarian requirements and take humanitarian specificities or sensitivities, such as humanitarian principles, into account.
- Digital transformation and digital accountability are essential aspects to be reflected in GFFO's new humanitarian strategy of 'doing no digital harm'.
- To raise and eventually address operational challenges around the use of technology, data protection regulations, and digital accountability, a neutral platform gathering diverse German humanitarian stakeholders is required.
- To facilitate interdisciplinary approaches to digital transformation, digitalisation needs to be mainstreamed across all areas.
- Increasing digital literacy at different functional and management levels is key to driving digital transformation and digital accountability in Germany.

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## Glossary

The concept of **accountability** in the humanitarian sector includes three components: (1) To take account refers to listening, communication, participation and participatory approaches, (2) to give account includes transparency, and (3) being held to account by different stakeholders which accounts for being responsible, having obligations to act in ways that are consistent with accepted standards and taking ownership for actions and non-actions to accept credit and blame (Hilhorst et al. 2021; Hilhorst 2018; CHS Alliance et al. 2015).

**Appraisal:** Appraisal refers to an assessment of what is being delivered and whether it matches up to what was promised (Derek 2022).

**Artificial Intelligence (AI)** refers to a broad term encompassing a set of sciences, theories, and techniques that seek to reproduce by a machine the cognitive abilities of a human being. As a category, AI indicates a system that automates an analytical process, such as the identification and classification of data (ICRC et al. 2020; Pizzi, et al. 2020).

**Bots** ('robots') are computer programmes that enable automated communication by recognising text, voice, and/or image-based inputs. They include but are not limited to chatbots or voicebots, which offer functions that range from answering frequently asked questions, learning from interactions, and identifying specific user intent. Social bots refer to social media accounts controlled by autonomous software, designed to impersonate real users (Scott 2022; OCHA 2021; VENRO 2019).

A **communication channel** is the way in which a message is shared and how people communicate such as a radio programme, SMS focus group, mobile messaging apps or social media (Bugge 2017).

**Consent** is the most popular and often preferred legal basis for processing personal data. Alternative legal bases used relevant in humanitarian settings include vital interest (of the data subject or another person), public interest, legitimate interest, performance of a contract, or compliance with a legal obligation (ICRC and Brussels Privacy Hub 2020).

**Data** refers to re-interpretable representation of information in a formalised manner suitable for communication, interpretation, or processing (IASC 2021).

**Data agency** refers to the power of having control of personal and/or community data and to decide whether, when, and with whom to share it. It means that people have the power to play active roles in data systems and to influence decisions about their data and about the ways that data use affects them. This is based on reasonably provided information about all data processing activities at all stages (Global Partnership for Sustainable Development Data 2022; Greenwood et al. 2017).

**Data breach** means the unauthorised modification, copying, unlawful destruction, accidental loss, improper disclosure, or undue transfer of, or tampering with, personal data (ICRC et al. 2020).

**Datafication** is often interchangeably used with big data and refers to the ability to quickly process large amounts of information or quantification of processes that were previously experienced qualitatively (Cieslik et al. 2022; Madianou 2019).

**Data governance** refers to the framework used to define who has authority and control over data and how that data may be used (e.g. access, security, retention) (Ada Lovelace Institute 2021).

**Data literacy** includes the skills, knowledge, attitudes, and social structures required for different populations to use data (School of Data 2016 in IFRC et al. 2022, 41).

**Data processing** means any operation or set of operations which is performed on personal data or sets of personal data, including collecting, recording, structuring, storing, adapting, retrieving, using, disclosing, disseminating, aligning, combining, deleting or erasing personal data (ICRC et al. 2020).

**Data protection:** The systematic application of a set of institutional, technical, and physical safeguards that preserve the right to privacy with respect to the processing of personal data (IASC 2021).

**Data responsibility** in humanitarian action is the safe, ethical, and effective management of personal and non-personal data for operational response (OCHA 2021).

**Data rights:** All people have fundamental rights to access, transmit, and benefit from information as a basic humanitarian need; to be protected from harms that may result from the provision of information during crisis; to have a reasonable expectation of privacy and data security; to have agency over how their data is collected and used; and to seek redress and rectification when data pertaining to them causes harm or is inaccurate (Greenwood et al. 2017).

International **data sharing** includes any act of transferring or making Personal Data accessible outside the country or International Organisation where they were originally collected or processed, including both to a different entity within the same Humanitarian Organisation or to a Third Party, via electronic means, the internet, or other means (ICRC et al. 2020).

**Data stewardship** refers to a set of functions to facilitate the collection, management, sharing, and use of data within and between organisations in a participatory and rights-preserving. Trust is fundamental to stewarding data and requires considering the power imbalances that exist in data systems and how they can be addressed through greater inclusion and participation and in turn contribute to accountability (Global Partnership for Sustainable Development Data 2022; Ada Lovelace Institute 2021).

**Data subject rights** are part of the EU General Data Protection Regulations (GDPR) which regulate how personal data of EU citizens is controlled and processed. They refer to a range of specific data rights, namely the right to be informed, the right of access, the right to rectification, the right to erasure ('right to be forgotten'), the right to restriction of processing, the right to data portability, the right to object processing, and the right to reject/accept automated decision-making and profiling (European Union n.d.).

**Digitalisation:** Integrating digital technologies into existing business processes (SAP n.d.).

**Digitisation:** Converting information and documents from analogue to digital formats (SAP n.d.).

**Digital transformation** involves integrating digital technologies and solutions into every area of a business. This is as much a cultural change as a technological one and requires fundamental shifts. While overall motives which guide goals and aspirations might not change, digital transformation impacts the way organisations operate, deliver services and engage people (Souter 2022; SAP n.d.).

**Disaggregated data** refers to data that is broken down into one or more dimensions or characteristics like sex, geographic areas, age (Global Partnership for Sustainable Development Data 2022).

**Disinformation:** Intentionally false information that is fabricated and/or disseminated with malicious intent. This can include terms such as propaganda and "information operations" (ICRC 2021).

**Doing no digital harm** is based on the 'do no harm' imperative which refers to humanitarian actions to not have adverse impacts on, or create new risks for, affected people. Adding the digital lenses has become a critical imperative to the way humanitarian organisations and their partners manage data, implement activities and connect with affected people in the digital space (Burton 2021).

**Feedback:** Based on sufficient trust, feedback can help to find out that a service is not meeting people's satisfaction and identify ways to improve (Derek 2022).

**Function creep** refers to the way that data collected for one purpose (e.g. registration) may end up being used for an entirely different purpose (e.g. state surveillance) (Ajana 2013b in Madianou 2019, 6f).

**Harm:** Negative implications of a data processing initiative on the rights of a data subject, or a group of data subjects, including but not limited to physical and psychological harm, discrimination, and denial of access to services (IASC 2021).

**Hate speech:** All forms of expression (text, images, audio, video) that spread, incite, promote, or justify hatred and violence based on intolerance, usually against identity traits (gender, religion, ethnicity, sexual orientation, etc.). Hate speech can contain a mix of misinformation, disinformation, and rumours that are exploited by the perpetrators. Hate speech uses analogue and digital communication systems to drive in-group/ out-group tensions, and trigger violence against members of another identity-based group (ICRC 2021).

**Misinformation** refers to false or misleading content that is unintentionally shared without intent to cause harm. The effects of misinformation can still be harmful and spread via rumours, a series of social media posts, etc. (ICRC 2021).

**Mobile messaging apps** are software programmes that run on digital devices like smartphones, tablets, or computers. Unlike SMS-messages, mobile messaging apps sent via telephone networks, use wireless or mobile data networks to instantly transmit information ranging from text to audio and document files (OCHA 2021; ICRC et al. 2020).

**Personal data** means any information relating to an identified or identifiable natural person (ICRC 2021).

**Rumours** refer to information that is rapidly passed on from one person to another, often without being verified or having started as instances of misinformation or disinformation. What sets them apart is how widespread they become, making it impossible to trace and verify a source in order to assess credibility (ICRC 2021).

**Sensitive Data** means Personal Data which, if disclosed, may result in discrimination against or the repression of the individual concerned. Typically, data relating to health, ethnicity, religious/political/armed group affiliation, or genetic and biometric data are considered to be Sensitive Data. All Sensitive Data require augmented protection even though different types of data falling under the scope of Sensitive Data (e.g. different types of biometric data) may present different levels of sensitivity. Given the specific situations in which Humanitarian Organizations work and the possibility that some data elements could give rise to discrimination, setting out a definitive list of Sensitive Data categories in Humanitarian Action is not meaningful. Sensitivity of data as well as appropriate safeguards (e.g. technical and organizational security measures) have to be considered on a case-by-case basis (ICRC et al. 2020).

**Social media** refers to a broad term that can encompass blogs, content communities, and social networks like Facebook and Twitter (OCHA 2021).

**System accountability** means that humanitarian workers hold each other to account in formal and informal ways. It can also mean that agencies work together to provide communities with a common window for forwarding complaints (Hilhorst et al. 2021).

The concept of **techno-colonialism** aims to analyse the convergence of digital developments with humanitarian structures and market forces and the extent to which they reinvigorate and rework colonial relationships of dependency. Techno-colonialism shifts the attention to the constitutive role that data and digital innovation play in entrenching inequalities between refugees and humanitarian agencies and, ultimately, inequalities in the global context (Madianou 2019).

**Troll farms** are organised operations, where workers are employed to manage fraudulent social media accounts to generate online traffic aimed at affecting public opinion (Snider 2018 in Scott 2022: 7).

# Annex

## Interview Guide

This interview guide is part of the which looks at identifying opportunities and limitations of digitalisation in the humanitarian sector to eventually enhance digital literacy. Considering the current information and communication revolution, the project analyses the usage of digital technologies in strengthening participation and Accountability to Affected Populations (AAP) by learning from diverse experiences, debates and trends, identifying opportunities, challenges and risks, and studying its uptake as part of the digital transformation process of German humanitarian actors.

The tension between pros and cons of using digital technologies in strengthening participation are discussed based on the assumption that digitalisation, on the one hand, might lead to innovation, increase accountability and efficiency of humanitarian assistance, and create new opportunities for participation of those affected by crisis. On the other hand, those developments might come along with new trade-offs to protect people and their personal data as well as their personal rights with serious implications towards people's safety and inclusion, particularly of those already marginalised.

By using selected commitments of the CHS framework, the study looks at accountability from the perspective of taking account of affected people's positions and humanitarian actors being hold to account by affected people, i.e. participatory and accountability tools or technologies play as much of a role as data rights and data agency.

### **Audience:** **International Humanitarian Actors**

#### **Digital transformation process**

In your experience, how does your organisation use digital technology? What was the main reason for 'going digital' (e.g. increase accountability, improve audit trails/efficiency, provide evidence, create database/registry)?

How does your organisation (systematically) manage the digital transformation process (e.g. development of digital/data strategy, cross-functional collaboration, user centric design)? What did you learn; are there any 'do's and don'ts' to recommend?

In your opinion, what are the main opportunities of the sector's ongoing digital transformation? What are the main challenges or constraints which might hinder the process?

#### **Digital technologies for increased participation and strengthening accountability**

How does your organisation understand and implement AAP?

Which tools or channels does your organisation and/or partners apply to be accountable to affected people, i.e. taking account of and being taken to account?

How does your organisation use digital technology in strengthening AAP implementation? Why did you choose that technology, who uses and manages it? What risk mitigation measures do you apply?

How does your organisation engage affected people and/or local counterparts on data or digital tools (e.g. user journeys, user centric design, programmatic adjustments based on feedback/complaints, validation of data)?

How does your organisation inform affected people about their data rights? Can affected people make a data appeal or access their data? Do you implement any activities aiming to build or strengthen people's data/digital literacy?

In your experience, what is the level of digital/data knowledge amongst staff/teams involved in AAP related matters (i.e. own organisation, partners, peers)?

From your perspective, how do humanitarian actors manage or address new challenges and trade-offs, like misinformation, disinformation or hate speech (MDH), privacy incidents, data rights, etc.?

#### **Coordination and partnerships**

How does your organisation collaborate with other (humanitarian) stakeholders on data/digital topics related to (digital) AAP? Why and with whom?

In your experience, what type of (national, international) forum would be needed, for what and who should be part of such forum?

Are there any new actors to be considered/included in the discussion? Who are those and what are their roles and responsibilities? What are the challenges and opportunities working with them?

Have I missed anything? Is there anything you would like to raise or highlight? Is there anyone else you would recommend speaking to within your organisation?



## Audience: German Humanitarian Actors

### Digital transformation processes

In your experience, how do German humanitarian actors use digital technology? What is the main purpose for 'going digital' (e.g. improve audit trails/efficiency, provide evidence, create database/registry)?

Does your organisation have a digital/data strategy or policy in place alongside relevant operational frameworks that guide the digital transformation process? If yes, who is the audience and what does it mainly focus on?

If a digital strategy or alike is available, is it applied to different portfolios/workstreams, or does it focus on one portfolio only (e.g. CBT, M&E)?

Who was engaged in developing the strategy/policy/framework or should have been engaged, why and how?

Who has the oversight function of the digitalisation processes (e.g. IT vs business owner/programme)?

How do you organise the cross-functional decision-making on digital/data aspects? Why and with whom (e.g. inter-generational dialogue between digital natives/literates and non-natives)?

In your experience, what are the main opportunities of digital transformation? What are the main constraints which might hinder the process?

### Digital technologies for increased participation and strengthening accountability

In your experience, how do German humanitarian actors understand AAP? How is AAP implemented? And informed by development approaches and learnings?

Which tools or channels does your organisation and/or partners apply to be accountable to affected people, i.e. taking account of and being taken to account?

How does your organisation use digital technology in strengthening AAP implementation? Why did you choose that technology, who uses and manages it? What risk mitigation measures do you apply?

How does your organisation inform affected people about their data rights? Can affected people make a data appeal or access their data? Do you implement any activities aiming to build or strengthen people's data/digital literacy?

How does your organisation engage affected people and/or local counterparts on data or digital tools (e.g. user journeys, user centric design, programmatic adjustments based on feedback/complaints, validation of data)?

In your experience, what is the level of digital/data knowledge amongst staff/ teams involved in AAP related matters (i.e. own organisation, partners, peers)?

From your perspective, how does your organisation manage or address new challenges and trade-offs, like misinformation, disinformation or hate speech (MDH), privacy incidents, data rights, etc.?

### Coordination and partnerships

From your perspective, do German humanitarian actors use existing standards and/or discuss those with their peer group? Or do they rather prefer developing own organisational/internal standards (overall as well as specifically on digital/data and AAP)? If existing standards are used, how; if not used, why not?

What is your overall perception about German actors, do they engage (internationally, nationally) on data or digital topics as well as AAP? Why and with whom? If not, what is needed to increase German participation?

In your experience, what type of (national, international) forum would be needed for what and who should lead them or be part of such forum, respectively?

Can you think of cases where German governmental and non-governmental actors should have interacted on data/digital matters in the past or should interact on in future (e.g. regulatory frameworks, digital infrastructure, prevention of cyberattacks, data sharing, funding)?

Are there any new actors to be considered/included in the discussion? Who are those and what are their roles and responsibilities? What are the challenges and opportunities working with them?

Have I missed anything? Is there anything you would like to raise or highlight? Is there anyone else you would recommend speaking to within your organisation?

## Imprint

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This paper is a result of the project component **Enhancing digital literacy: Identifying the opportunities and limitations of digitalisation**, which is part of the project **“Strengthening the Programme and Policy Relevant Capabilities of Humanitarian Actors in Germany” (SPreAD)**, funded by the German Federal Foreign Office.



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## Recommended Citation

Düchting, Andrea. 2023. Digital accountability: The untapped potential of participation when using digital technology in humanitarian action. Berlin: Centre for Humanitarian Action.

## CHA Publications

Hövelmann, Sonja. 2022. With nine months on the clock: Where does the Grand Bargain 2.0 stand and what role is Germany taking on? Berlin: Centre for Humanitarian Action  
<https://www.chaberlin.org/en/publications/cha-policy-brief-where-does-the-grand-bargain-2-0-stand/>

Steinke, Andrea, and Sonja Hövelmann. 2021. Whose Health Matters: Trust and Mistrust in Humanitarian Crisis and Global Health Interventions. Berlin: Centre for Humanitarian Action  
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February 2023