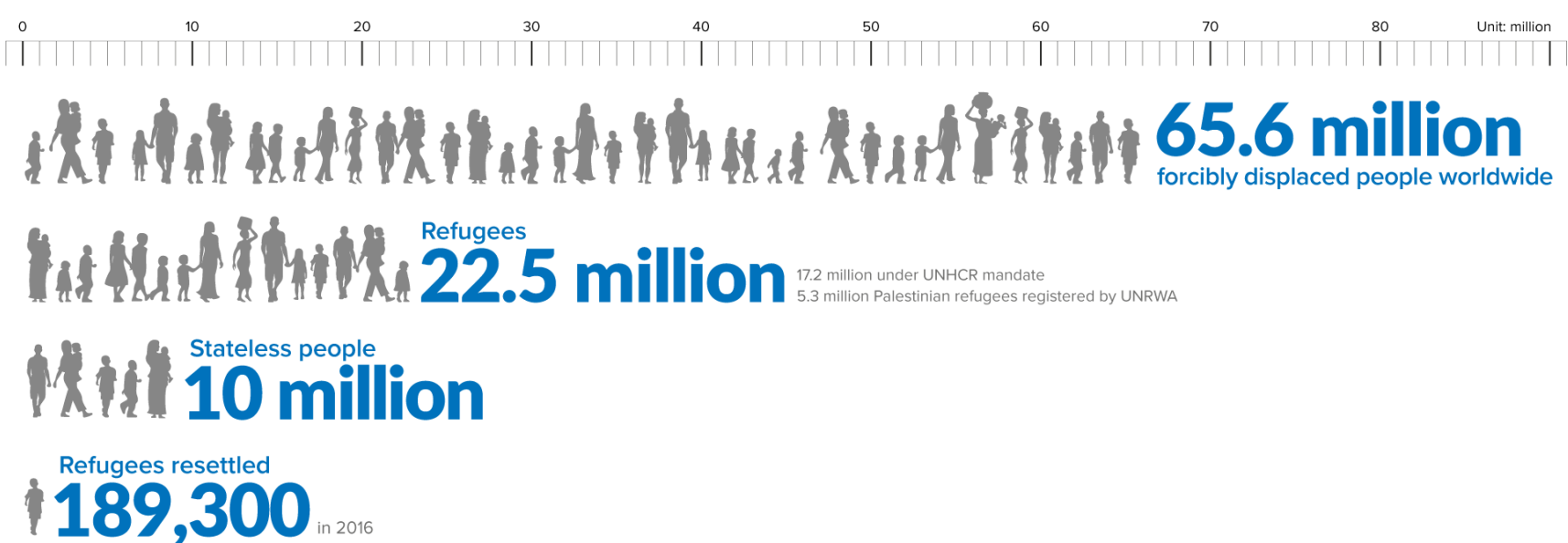# Privacy and Security Guidelines for Humanitarian Work with Undocumented Migrants

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Humanitarian Information Activities

HIA = All "activities and programs which may include the collection, storage, processing, analysis, further use, transmission, and public release of data and other forms of information by humanitarian actors and/or affected communities" (Greenwood et al., 2017)

65.6 million forcibly displaced people worldwide

Refugees **22.5 million** 17.2 million under UNHCR mandate 5.3 million Palestinian refugees registered by UNRWA

Stateless people **10 million**

Refugees resettled **189,300** in 2016

Related Work

1) **HIA-related risks involve both technology and people:**
   - leaks, hacks
   - negligently handling information
2) **Need for clear guidelines for HIA:**
   - gaps in HIA law standards
   - data protection rights insufficient on informed consent
   - lack of a single accepted definition of accountability
3) **Privacy self-management is not enough:**
   - might resonate with the idea of empowering people
   - vulnerable populations have higher risk of making ill-informed or non-careful decisions
   - vulnerable people might not have the ability to opt-out

Methodology

- Interviews with 9 staff members. Different roles: executive directors, coordinators, legal advisors, and IT directors.
- 4 different advocacy groups
- 2 higher education institutions
- US West Coast

Results

1) **HIA-related risks involve both technology and people:**
   - University of Nepantla: Low-tech method for students to avoid cameras at highly photographed events
   - La Resaca: No budget. Third-party services often manage and store their databases to guarantee the data is secured.

2) **Need for clear guidelines for HIA:**
   - University of Nepantla: Only higher-ranking staff members receive training on FERPA and in privacy and security.
   - La Resaca: normally no concrete sets of privacy standards or do not provide privacy-related training to employees and volunteers. Learning on-the-go, external, or if required by funders.

3) **Privacy self-management is not enough:**
   - University of Nepantla: leave it up to the students to disclose their status, except for matters of tuition and financial aid. Help them set their privacy settings on Facebook. They do not feel they have the right to tell students what they should and should not do.
   - La Resaca: Staff members dedicate time to their clients to make sure they understand what they are agreeing to. They have concerns because their clients may not have access to the tools, knowledge, and resources needed to make appropriate privacy decisions.

GUIDELINES for HO Privacy and Security-related Protocols
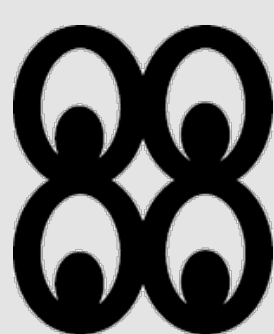
1. **Exercise prudence**
   Limit the collection of personal information; include only information that is necessary.

2. **Protect and secure information from/about migrants**
   Pay attention to mitigating risks from both technological and human factors.

3. **Provide training**
   Ensure that volunteers and staff are aware and trained regarding privacy- and security-related protocols. Empower migrants to be more privacy aware.

4. **Share-alike**
   Work with collaborators and partners to improve privacy and security practices, based on on-going evaluation and refinement.

5. **Non-discrimination**
   Provide humanitarian services to everybody, including those who prefer not to share their personal information.