



Global
Partnership
for Sustainable
Development Data



ETHICS AND INTEGRITY FRAMEWORK

The Global Partnership for Sustainable Development Data

October 2019

Introduction

The Global Partnership for Sustainable Development Data is a growing network of hundreds of partners from around the world, including governments, businesses, civil society, international organizations, academia, foundations, and statistics agencies. The Global Partnership envisions a world in which all stakeholders across sectors see data as an essential part of the infrastructure for sustainable development, investing in the technology and people to use it equitably and effectively and using data in decision-making; people are protected from abuses of their personal data and have the data and the skills they need to hold governments to account; companies have the data they need to make investments that promote sustainable development; and rules and infrastructures that govern data sharing and use around the world are fit for purpose, facilitating safe sharing of timely data going where it is needed, when it is needed.

The purpose of the Global Partnership for Sustainable Development Data's Ethics and Integrity Framework is to ensure that the Global Partnership network of partners, Secretariat, and governance bodies apply ethical considerations across all our collaborative work and network interactions. The Framework also provides practical guidance to ensure ethical conduct within the network and in carrying out our work.

This framework entails the establishment of a Board Ethics Committee (EC) [see section 4] to oversee its implementation. Once the EC is constituted, it will review this framework at regular intervals – to be defined by the EC – to ensure that it continues to serve the needs of the Global Partnership and is in line with the policies and practices of the Global Partnership's host institution. The EC may request the Secretariat to revise all or part of the Framework to ensure it is fit for purpose. Any changes will be subject to Board approval.

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01 Who We Are:

Network and partner considerations

1.1 Network code of conduct*

The Global Partnership for Sustainable Development Data is a professional network of partners and collaborators from different sectors, geographies, and backgrounds who work towards a world where the opportunities of the data revolution are available to and for all of humanity, as a force for improving life for all people, everywhere.

Naturally, this implies diversity of ideas and perspectives on often complex problems. Disagreement and healthy discussion of conflicting viewpoints is welcome: the best solutions to hard problems rarely come from a single perspective. Nonetheless, disagreement is not an excuse for aggression. This is particularly acute with online communication across language and cultural differences, where many cues of human behavior are unavailable.

This code of conduct outlines a set of principles and processes to guide the culture of partnership we are aiming to cultivate. This a culture in which differing viewpoints are encouraged, constructive disagreements and criticism is welcomed in the spirit of collaboration and innovation, and creativity and diversity are celebrated.

This code applies equally to partners, collaborators, members of the Board and Technical Advisory Group, consultants and members of the Secretariat, in all online and offline spaces and activities managed by the Global Partnership for Sustainable

Development Data. This includes Google Groups, social media (Twitter, Facebook, LinkedIn, WhatsApp, YouTube, etc.), in-person events, and any other forums created by the Global Partnership. In addition, violations of this code outside these spaces may affect a person's ability to participate within them.

By embracing the following principles and guidelines, you will help us make the Global Partnership a welcoming and productive network.

1. Be welcoming. We strive to be a network that welcomes and supports people and organizations of all backgrounds and identities. Some examples of behavior that contribute to creating a positive environment include:

- Using welcoming and inclusive language
- Being respectful of differing viewpoints and experiences
- Gracefully accepting and providing constructive criticism
- Showing empathy towards other partners and collaborators
- Placing collective interest before personal interest

2. Be respectful. Not all of us will agree all the time, but disagreement is no excuse for poor behavior and poor manners. Partners and collaborators of the Global Partnership for Sustainable Development

*See references, page 12

Data should be respectful when dealing with other partners and collaborators as well as with people outside the Global Partnership.

3. Be careful in the words that you choose. We are a global network of professionals, and we conduct ourselves professionally. Be kind to others. Do not insult or put down other participants. Harassment and other exclusionary behaviors are not acceptable. This includes, but is not limited to:

- Violent threats or violent language directed against another person
- Discriminatory jokes and language
- Posting sexually explicit or violent material
- Posting (or threatening to post) other people's personally identifying information ("doxing")
- Personal insults, especially those using racist or sexist terms
- Unwelcome sexual attention
- Advocating for, or encouraging, any of the above behavior
- Repeated harassment of others. If someone asks you to stop, then stop

Additionally, the following behaviors will not be tolerated:

- Actions which constitute discrimination, harassment, bullying or similar abusive conduct, physical abuse, or sexual exploitation or other sexual misconduct
- Plagiarism
- False information or statements

It is not possible to list all the forms of behavior that are considered unacceptable. As such, the above list of prohibited conduct is not exclusive and does not purport to include every type of conduct that may violate the spirit of the code.

Addressing violations

Code of conduct violations reduce trust and the ability of partners to engage and form meaningful professional connections within the network, therefore we take them seriously.

As a first measure, and if possible, it is preferable to work out issues directly with the people involved. This may take several forms:

- **Talk with one another.** Assume that communications are positive, and that people are treating each other with respect. Cues about emotions are often lacking in digital communications. Many of our modes of digital communication tend towards brevity, which can be easier to interpret incorrectly as being negative.
- **A simple apology can go a long way.** It can often de-escalate a situation and telling someone that you are sorry is an act of empathy that does not automatically imply an admission of guilt.

When these informal approaches fail, or when a situation warrants an immediate response by the Global Partnership Secretariat or Board, partners are asked to report it to ethics@data4SDGs.org in a timely manner. [Ethics complaints can also be sent to concern@unfoundation.org, an external avenue to submit complaints to the United Nations Foundation (UNF). These complaints will be reviewed by the UNF Safeguarding Officer and Investigative Officer, who will notify the Global Partnership of the complaint.] The requirements for submitting a complaint and the process for responding to it are outlined in Section 4 of this Framework.

As the Global Partnership's host institution, UNF has contractual oversight of Secretariat employees and contractors. Therefore, any allegations against members of the Secretariat, grantees, and contractors will be handed over to UNF to investigate and address according to UNF's policies. This process is also outlined in Section 4 of this Framework.

1.2 Partner assessment

1.2.1 GPSDD standard vetting

At its founding in 2015, the Global Partnership had 56 official partners from across sectors and geographies. By 2018, the network had grown to 320 partners – a percentage increase of 471.4%. As the network grows, we need to consider the risks associated with the Global Partnership's positioning as a very open and growing partnership, and the criteria by which we engage new partners and respond to major changes in existing partner organizations.

The standard vetting process for assessing whether an organization can become an 'official' partner includes:

- Verifying the existence and legitimacy of the organization through online research;
- Conducting terrorism and debarment checks of the organization and its highest-ranking official against several domestic and international databases (European Union Consolidated List of Sanctions; World Bank Listing of Ineligible Firms & Individuals; UN Al-Qaida list; UN Taliban list; UK Terrorism List; UK Sanctions List; U.S. Treasury Department Sanctions List; SAM.gov)
- Contacting the prospective partner, acquiring a clear point of contact with a working email address, and meeting with the contact to understand their goals and interests with respect to GPSDD and its activities.

Partners who receive funding from or give funding to the Global Partnership may be subject to additional UNF vetting procedures.

Private sector partners

The Secretariat's engagement with private sector partners must remain impartial. The Secretariat's engagement with private sector partners should not provide, or imply, exclusivity, endorsement or preference to a particular company, product, or service.

1.2.2 Cases of concern

Our goal in assessing cases of concern is to be as objective and transparent as possible, while recognizing that each case will be different. This framework includes a set of criteria for assessing the partner as well as key questions and reference documents to help guide the assessment. Cases of concern can be raised by partners, collaborators, members of the Secretariat, Board or Technical Advisory Group. Cases of concern may arise with regard to prospective partners or existing partners where a major organizational change has taken place (e.g. change of government, major organizational crisis or scandal). The GPSDD Secretariat will be responsible for applying this Framework in cases of concern. The Secretariat will document the assessment and decision-making process and then submit it to the Board Ethics Committee (EC) for review and approval (see Section 4).

Criteria

Alignment with GPSDD Values	Contribution to the Enabling Environment for GPSDD's Work
Global Partnership for Sustainable Development Data vision and mission	Willingness to dialogue, engage, and collaborate with multiple stakeholders
Willingness to engage and collaborate in a spirit of mutual respect, equality, and transparency	Political/institutional commitment to improving data for sustainable development ecosystems
Commitment to achieving Agenda 2030 and the SDGs	Active consideration of how to minimize misuse of data and negative impact on people and users

Key questions

- Would working with this partner pose a reputational risk to the Global Partnership or its partners?
- Would mistrust of this partner hamper the ability of other partners to collaborate openly?
- Would the risk of working with this partner hamper in-country engagement by the Secretariat or its partners, e.g., security risk in a country?

Reference documents

- Global Partnership for Sustainable Development Data Vision and Mission
- Global Partnership for Sustainable Development Data Code of Conduct
- Terrorism and debarment databases (references above)
- Data Ecosystem Maturity Matrix
- United Nations Global Compact 10 Principles
- UN Guiding Principles on Business and Human Rights

02 What We Do: Projects, initiatives, collaborations and products

2.2 Project design

One of the Global Partnership's core goals is to foster collaborative and innovative efforts to meet data challenges. We do this by facilitating connections among partner organizations and catalyzing new products and projects that respond to partners' priorities for improving the production and use of data for sustainable development. Each collaboration we facilitate may bring together partners from different sectors, geographies, and data communities with different approaches to considering the ethical implications of their work. We put a premium on innovation and experimentation, which may mean that the collaborations we facilitate are testing new approaches for the first time. Therefore, it is important that there is a clear process for considering the ethical implications of collaborations at the project design stage.

From the outset, we will review collaborating partners' processes and tools for reviewing the ethical implications of prospective projects and for implementing measures to mitigate risks. In many cases, these will be sufficient to allay major ethical concerns and to ensure that appropriate mitigating actions are in place.

When partners' processes are insufficient, we will use the Open Data Institute's Data Ethics Canvas. The canvas includes 15 steps "designed to help identify potential ethical issues associated with a

data project or activity. It promotes understanding and debate around the foundation, intention and potential impact of any piece of work, and helps identify the steps needed to act ethically." We chose the Data Ethics Canvas after a review of the landscape and an assessment of what other tools are available to address our needs with regard to data ethics considerations in project design. We determined that the ODI's Canvas provides the most comprehensive and user-friendly tool that is also adaptable to different situations and types of projects. The ODI has also developed accompanying tools to facilitate the application of the Canvas in different settings, improving the ease with which we can adapt it to different circumstances.

2.3 Data management

2.3.3 Partner personal information

The Global Partnership Secretariat holds partner personal information in the form of email addresses for those subscribed to our listservs and Google groups, which are used to facilitate partner interaction, exchange, and collaboration. The European Union's General Data Protection Regulation (GDPR) provided an opportunity for the Secretariat to review our privacy policy and ensure full transparency with our partners and subscribers. The following steps have been taken, and we will continue to ensure ongoing compliance with GDPR and other laws and regulations in the management of partners' data.

- Updated our privacy policy
- Included the privacy policy in the Become a Partner form for reference for new partners
- Adjusted the features of all Google group messages to make it easier to opt out and alerting recipients to our privacy policy
- Sent a message to all newsletter recipients requesting that they opt-in
- Sent a message to all partners describing the steps taken to bring our systems into compliance

03 Procurement and partners as vendors

Whenever possible, all grants and contracts given out by the Global Partnership will be awarded on a competitive basis, following the GPSDD Procurement Policy and in compliance with donor requirements. In rare cases, grants and contracts may be given to partners who are working closely with the Global Partnership on one of its workstreams, through a non-competitive process. The Global Partnership may also work with a partner on a successful funding proposal and then need to administer a sub-award to that partner. In those cases, the Secretariat will ask the EC to review the rationale for such funding decisions as soon as possible in the proposal and funding process. The EC will act as an impartial arbiter, to ensure that any non-competitive funding given out by the Global Partnership was reasonable, justifiable, and showed no bias on the part of the Secretariat.

The Global Partnership Secretariat will submit requests for approval of non-competitive funding to the EC on a quarterly basis. As a standard practice, requests and approvals will be sent via email, unless a member of the EC requests a meeting to discuss one of the requests.

The request for approval will include:

- Partner Name
- Scope of Work
- Estimated Total Budget
- Rationale for use of this partner and lack of competition
- List of other active partners capable of implementing this project/program and rationale for why they were not asked to submit an application
- Confirmation that GPSDD funding source allows sole sourcing

While not shared with the EC unless requested, a proposal and budget, in the Global Partnership's standard template, will be requested from the partner prior to the awarding of funds.

After reviewing the rationale, the final decision to move forward with funding to the partner will rest with a majority vote of the EC.

04 Implementing this framework

4.1 GPSDD roles and responsibilities

The Global Partnership's Board has ultimate ownership over the Ethics and Integrity Framework (Framework). This ownership arises from the overall responsibility of the Board and its Committees to provide oversight and embody the highest standards of ethical conduct, given their responsibilities to act as ambassadors for the Global Partnership.

The Board will delegate to the EC the responsibility to oversee the Framework's implementation. The EC consists of three members of the Board, one of whom is a representative of the Global Partnership's host organization, the United Nations Foundation (UNF). Non-UNF EC members serve for two years. The EC has the following specific responsibilities:

- a. Oversee the Secretariat's activities in embedding the Global Partnership's core ethical values into its operations;
- b. Oversee the effectiveness of the Global Partnership's ethics and integrity-related policies and codes;
- c. Address actual and perceived ethical misconduct by Board and TAG members, partners, and the Secretariat to the extent described elsewhere in this Framework, and identify and apply appropriate remedial actions;
- d. Review partner assessments in cases of concern (see section 1.2.2);
- e. Approve modifications to the Framework;

- f. Address potential conflicts of interest in accordance with the process described in applicable policies; and
- g. Ensure funding given to partners through non-competitive means is well justified (see section 3).

The CEO, with the support of Secretariat senior management, has the responsibility to implement the Ethics and Integrity Framework within the Global Partnership's operations. In this regard, the CEO is responsible for ensuring that the Global Partnership's operations and organizational practice reflect the highest level of ethical conduct, based on applicable policies and procedures, including this Framework. In addition to Secretariat activities, the CEO is responsible for ensuring the Global Partnership's best efforts to minimize unethical conduct when awarding grants and contracts (e.g. corruption and fraud). Finally, the CEO and his/her designated Secretariat staff are responsible for undertaking remedial action when unethical conduct is observed (e.g. funding suspension or termination, expulsion of partner from the Global Partnership, or disciplinary action towards staff members in line with UN Foundation human resources policies and procedures, as host institution).

An Ethics Officer, who is a member of the Secretariat senior management, will be appointed based on the recommendation of the EC, and is responsible for providing assurance on the extent to which the Global Partnership has fully and effectively implemented its ethics and integrity-related policies, codes, and requirements.

The Ethics Officer's responsibilities include, but are not limited to, the following:

- a. Monitor the effectiveness of existing systems and procedures for integrating ethics and integrity into Global Partnership operations, and propose modifications as appropriate to the EC;
- b. Undertake preliminary investigations of perceived ethical misconduct and refer such cases to the EC as appropriate;
- c. Provide regular advice and support to the EC, CEO, and Secretariat staff on ethics and integrity-related issues, including identification and management of conflicts of interest and ethical misconduct involving Global Partnership staff and governance officials;

4.2 Procedures for handling allegations of misconduct

An important part of implementing the Global Partnership's values is acting to protect the organization and its activities when aware of improper conduct. Consequently, anyone aware of possible abuses or improper activities must immediately inform the Global Partnership through the appropriate channel.

The Global Partnership is committed to protecting those who identify and report, in good faith, violations of the organization's policies or other acts of fraud, corruption, or dishonesty from retaliation or reprisal.

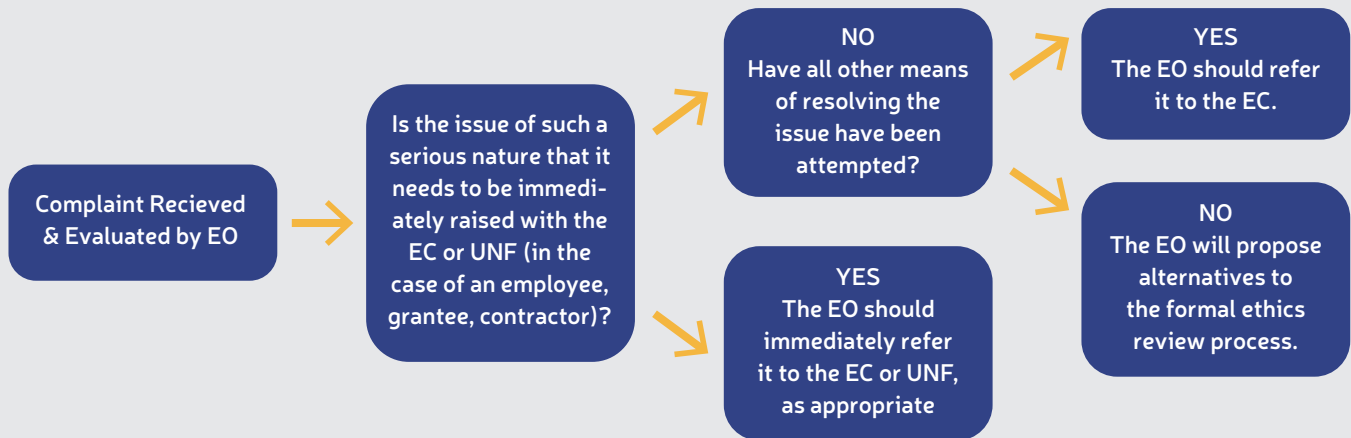
Ethics Committee Rules

- The EC may not meet or take action without the presence of a quorum. Three voting members shall constitute a quorum.
- The EC shall respect the privacy of individuals and the presumption of innocence at all times.
- The EC shall hold all information and communications pertaining to the review process confidential. A confidentiality agreement must be signed by all EC members and be on file with the Global Partnership Secretariat.
- If a member of the EC is named as a respondent, he/she will be removed from the EC during the investigation and the Chairperson of the Board will nominate a replacement.
- If a member of the EC has a conflict of interest with either party of a complaint, he/she will recuse him/herself from the EC and the Chairperson of the Board will nominate a replacement. The EC member would be eligible to continue to serve on the EC while recused from the complaint in question.
- In the event the complainant withdraws the complaint, the EC reserves the right to proceed if deemed to be in the best interest of the Global Partnership.
- No one must attempt to influence members of the EC on the issue outside the official procedures allowed for the ethical review process.

Basis of Complaint or Request for Ethics Review

Complaints may be filed against Global Partnership partner organizations or representatives of those organizations, Global Partnership contractors or grantees, members of the Secretariat, and Board and TAG members for a violation of the Ethics and Integrity Framework. As the host institution, UNF has contractual oversight of Secretariat employees and contractors. Therefore, any allegations against members of the Secretariat and contractors will be handed over to UNF to investigate and address according to UNF's employee and contractor policies. UNF will be responsible for any disciplinary actions against members of the Secretariat that result in a change in employment status, and against any contractors that result in a change or termination of the contract.

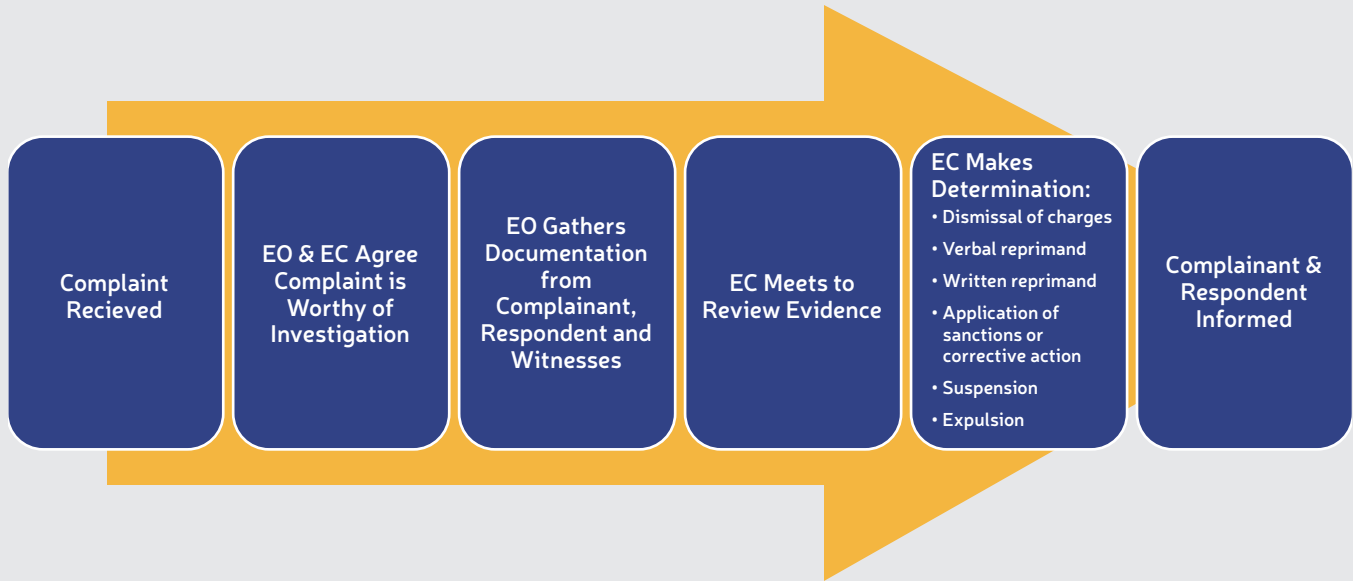
Figure 01



Filing a Complaint (see Figure 1)

- Any individual may file a complaint against a Global Partnership partner organization or representative of a partner organization, member of the Secretariat, Board or TAG, by submitting a written complaint, which must include:
 - The full name and contact information of the complainant;
 - The full name and contact information, if known, of the respondent; and
 - A concise statement of the facts, which clearly and accurately describe the allegations against the respondent. Whenever possible, the complainant shall identify the specific principle violated and any witnesses.
- The complaint must be sent to ethics@data4sdgs.org, an account monitored by the Ethics Officer. (Ethics complaints can also be sent to concern@unfoundation.org, an external avenue to submit complaints to UNF. These complaints will be reviewed by the UNF Safeguarding Officer and Investigative Officer, who will notify the Global Partnership of the complaint.)
- The Ethics Officer will review the complaint and determine the following:
 - Have all other means of resolving the issue been attempted? These might include a mediated conversation between the complainant and the respondent or a reminder of the Global Partnership Code of Conduct sent to the respondent or the wider Partnership.
 - Is the issue of such a serious nature that it needs to be immediately raised with the EC? This might include cases of fraud, harassment based on any protected class, or any other illegal actions. It may also include repeated infractions by an individual.
 - The Ethics Officer will notify the CEO and EC Chairperson of the need for a review of a complaint by the EC. The UNF Safeguarding Officer and Investigative Officer will also be notified.

Figure 02



Handling the Filed Complaint (see Figure 2)

- The Ethics Officer will acknowledge receipt of the complaint and will liaise with the complainant to ensure that all required information has been submitted.
- In cases of a complaint against a member of the Secretariat, a grantee, or a contractor, UNF will take over the investigation and response. In all other cases, the EC shall convene within 30 days of the receipt of the complaint. The purpose of this meeting will be to determine if the complaint merits consideration and investigation.
- The EC will notify the complainant, in writing, if the complaint is found to be of merit or if the complaint has been dismissed.
- If the complaint is found to be of merit, the following steps will be taken.
 - The respondent will be informed and will be asked to submit a written statement in his/her defense. The respondent also has the right to choose to indicate that he/she does not plan to contest the complaint and may waive the right to a defense. In such instance, the EC will recommend and execute a response, up to and including suspension or expulsion.
 - Depending on the nature of the complaint, witnesses may be asked to submit written statements.
 - The Ethics Officer will prepare a summary of any past complaints against the respondent.
- If the respondent refuses to cooperate with the EC, the EC may rule in favor of the complainant.
- The EC shall convene within two weeks of receiving the respondent's written statement to review all materials related to the complaint and make a determination.

Investigation Policy

- All written materials related to the complaint shall be maintained, in confidence, by the Ethics Officer.
- Failure of the complainant to participate after the initial complaint is submitted may result in the dismissal of the complaint.
- The EC may invite additional parties to submit statements. These parties will be restricted to individuals who have first-hand knowledge of the situations that led to the complaint. These individuals may refuse participation.
- The EC may choose to engage an outside party with the specific expertise to help investigate and mediate the complaint. This will be done at the discretion of the EC with input from the Secretariat.
- The EC shall comply with applicable laws including, but not limited to the Whistle Blower Act, EEO, and ADA.
- The final decision rests with a majority vote of the EC.
- If the EC, in the course of its work, uncovers potential misconduct by a member of the Secretariat, or fraud or corruption by a contractor or grantee, it will refer the matter to UNF, which has fiduciary oversight as host institution.

Ethics Committee Responsibilities following the Investigation

- At the conclusion of the investigation, the EC shall submit to the Global Partnership's CEO and Chairperson of the Board its written report. The report shall include the following:
 - A summary of the case
 - A reconstruction of the process used by the EC to handle the complaint
 - The rationale for the final decision
 - The EC final decision, which will be one of the following:
 - Dismissal of charges
 - Verbal reprimand
 - Written reprimand
 - Application of sanctions or corrective actions
 - Suspension - no less than 60 days and not greater than 1 year
 - Expulsion¹ – must be presented to the Board of Directors for review
- The EC will notify the respondent and complainant in writing of the final decision within 30 days of the decision.
 - The respondent will be notified in writing that the decision may be appealed.

¹Expulsion must be reviewed by the Board of Directors before being implemented. Additionally, while the Ethics Committee can recommend suspension and expulsion for members of the GPSDD Secretariat, UNF will be responsible for any disciplinary actions against members of the Secretariat that result in a change in employment status.

References consulted

Code of conduct

Original text of [Speak Up!](#), [Project Jupyter](#), and the [HOT Community](#).

Additional inspiration from:

- [Al Jazeera Community Rules and Guidelines](#)
- [Ada Initiative: HOWTO design a code of conduct for your community](#)
- [Collaborate ASAE: Rules and Etiquette](#)
- [Geek Feminism Wiki: Community anti-harassment/Policy](#)

Implementing the Framework

- Global Fund to Fight AIDS, Tuberculosis and Malaria
- Ponies of America Club
- Asian Development Bank's procedures
- New York Society of Certified Public Accountants

Partner and other organization websites and resources reviewed

- Open Data Institute
- Data & Society
- DataPop Alliance
- Humanitarian Data Exchange
- Fraym
- Flowminder
- Plan International
- Local Development Research Institute
- Open Institute
- Lirne Asia
- Open Data Charter
- Twaweza
- Open Government Partnership
- Group on Earth Observations
- GPSDD donor rules and procedures



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